

**INFORMATION PURSUANT TO REGULATION (EU) 2016/679
(GENERAL DATA PROTECTION REGULATION)**

Data subjects: ADULT CUSTOMERS (AGED OVER 18)

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 and in relation to the personal data of which the undersigned Data Controller, **Marea S.r.l.**, will come into possession with the conferral of your assignment, we hereby inform you of the following:

1. Data Controller

The data controller is **Marea S.r.l.**,

VAT no. **02673370363**

Strada Vignolese 1684, 41126-Modena (MO)

e-mail: **andrea.balli@hrf.it**.

tel: **059 4792111**

fax: **059 4792190**

2. Data Protection Officer

The data protection officer is **Roberto Brighenti**.

c/o **Marea S.r.l., Strada Vignolese 1684, 41126-Modena (MO)**

e-mail: **roberto.brighenti@hrf.it**.

tel. **059 4792111**

3. Purpose of data processing

The purposes of the processing are:

- selling hotel products and/or offering hotel services;
- fulfilling tax and accounting obligations;
- invoicing;
- compliance with the obligations incumbent on the company and provided for in the current legislation (including, but not limited to: anti-money laundering, insurance, workplace safety, mandatory communication to certain bodies);
- defending a right in court or before legal authorities exercising judicial functions;
- video surveillance;
- being able to ensure an optimal level of hospitality and to guarantee the physical health of guests, thus being able to provide for the processing of data relating to special categories referred to respectively in Art. 9 of Regulation (EU) 2016/679;
- marketing and sending newsletters;
- external communication of data relating to your stay for the sole purpose of enabling the reception of messages and telephone calls addressed to you (except for communications relating to legal obligations).

4. Legal basis of the processing

The treatment is lawful, as it is:

- necessary for the performance of a contract to which you are party, or the performance of pre-contractual measures adopted at your request;
- necessary in order to comply with a legal obligation to which the data controller is subject (e.g. keeping and preserving accounting records in accordance with tax law and anti-money laundering, insurance and workplace safety regulations, mandatory communication to certain bodies);
- necessary for the pursuit of the legitimate interests of the data controller, for the defence of a right of the data controller in court or before legal authorities;
- protection of company assets (video surveillance);
- based on express consent (Art. 6(1)(a) of Regulation (EU) 2016/679), with reference to:
 - a. data belonging to special categories referred to respectively in Art. 9 of Regulation (EU) 2016/679, in order to be able to ensure an optimal level of hospitality and guarantee the physical health of guests;
 - b. marketing activities and newsletters;
 - c. external communication of data relating to your stay for the sole purpose of enabling the reception of messages and telephone calls addressed to you (except for communications relating to legal obligations).

5. Categories of personal data processed

The processing may relate to personal data such as: biographical data, addresses, domicile and/or residence, telephone number, e-mail address, bank details for payment purposes, data belonging to special categories under Art. 9 of Regulation (EU) 2016/679.

6. Data processing procedures

The processing shall be carried out, in a manner strictly necessary to fulfil the purposes set out above, by means of some of the operations or set of operations indicated in Art. 4(2) of Regulation (EU) 2016/679: collection, recording, organisation, structuring, storage, consultation, processing, adaptation, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data. The operations may be carried out with or without the aid of electronic, telematic or otherwise automated tools.

7. Provision of data

The provision of personal data is not a legal obligation, but a necessary requirement for the conclusion of the contract. For the provision of data for which consent is required, refusal will make it impossible to carry out the processing.

8. Data retention

Personal data shall be processed and retained for as long as is necessary for the complete performance of the contract to which you are a party, as well as for the proper fulfilment of retention obligations for civil and tax purposes or for other purposes provided for by laws or regulations indicated in point 2, as well as for the duration necessary for the pursuit of the legitimate interest of the data controller, for the purpose of defending a right in court or before legal authorities and in any case until the statute of limitations applicable to the rights arising from the contractual relationship has expired.

9. Disclosure of data

Personal data may be communicated to, or come to the knowledge of, the following parties, for the purposes in point 3, in order to provide, improve, protect and promote their services:

- subjects authorised to carry out processing operations;
- data processors and other further processors and authorised persons, including, but not limited to: accountants, consultants, providers of IT services, cloud computing or assistance services, and their appointed technical staff, agents or persons responsible for occasional maintenance operations, all of whom are adequately informed about the protection of confidentiality;
- legal or administrative authorities, for the fulfilment of legal obligations or for the performance of assignments received;
- banking and insurance institutions;
- parties that process data in execution of specific legal obligations.

10. Profiling

Personal data may be subject to fully automated decision-making processes, including profiling.

11. Transfer of data abroad

Your personal data may be transferred to countries outside the European Union, with the data controller making use of the following services:

- ‘Facebook’, ‘Facebook Messenger’ and ‘Instagram’, with headquarters at 1601 Willow Road, Menlo Park, CA 94025, United States, offered by Facebook Inc. (“Facebook”), which uses offices located in the United States;
- ‘YouTube’, with headquarters at 901 Cherry Avenue, San Bruno, CA 94066, United States, offered by Google LLC, which uses offices located in the United States;
- ‘LinkedIn’, with headquarters at 1000 W. Maude Avenue Sunnyvale, CA 94085, United States, offered by LinkedIn Corporation, which uses offices located in the United States;
- ‘X’, offered by X Holding Corp, which uses offices located in the United States;
- ‘WhatsApp’, with headquarters in Dublin, Ireland, offered by WhatsApp Ireland Limited, which uses offices located in the United States;
- ‘Pinterest Europe Ltd’, with headquarters at Waterloo Exchange, 3rd Floor, Waterloo Road, Dublin 4, Ireland.

The transfer of your personal data to the United States is, however, compliant with the GDPR, by virtue of the EU-US Adequacy Decision, adopted in the ‘Data Privacy Framework’ of 10 July 2023.

12. Rights of the data subject

Pursuant to Articles 15-18 and 20-21 of Regulation (EU) 2016/679, you have the right to obtain confirmation of the existence or non-existence of whether personal data concerning you exists or not, even if it has not yet been registered, and to receive communication of said data in an intelligible form. You have the right to obtain information on: a) the origin of the personal data; b) the purposes and methods of processing; c) the logic applied in the event of processing carried out with the aid of electronic instruments; d) the identification details of the data controller and any data processors; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as data processors or persons in charge of processing. You also have the right to obtain a) the updating, rectification or, when necessary, integration of the data; b) the deletion, anonymisation or blocking of data processed in breach of the law, including those which it is not necessary to keep in

view of the purposes for which they were collected or subsequently processed; c) a declaration that the tasks referred to in letters a) and b) have been brought to the attention, including in terms of their content, of anyone to whom the data was communicated or disseminated, except in the event that such a measure should prove impossible or entail an employment of resources which is patently disproportionate in view of the right being protected. You have the right to object to: a) the processing of all or part of the personal data concerning you, even if relevant for the purposes of the data collection, provided there are legitimate reasons; b) the processing of all or part of the personal data concerning you for the purposes of sending publicity material or for direct sales or the conducting of market research or commercial communication. You have the right to data portability, i.e. to receive personal data concerning you in a structured, commonly used and machine-readable format, and you have the right to transmit those data freely to another data controller. You also have the right to lodge a complaint with a supervisory authority (in Italy, the Garante per la Protezione dei dati personali: www.garanteprivacy.it). You may exercise your rights by submitting a written request to the data controller, at the addresses (registered office, e-mail) indicated in point 1.

With regard to possible breaches resulting from the transfer of data abroad, you may exercise your rights as set out in the Data Privacy Framework of 10 July 2023.

13. Data processing officers

You may obtain the list of data processing officers, in relation to limited sectors and operations, which is kept constantly updated, by addressing a request to the data controller, including through the contact details indicated in point 1.