

**ALFA HOTEL 2007 S.r.l. a Socio Unico**  
**Piazza Monteleone di Spoleto, 20 - 00191 Roma**  
**P.IVA / C.F. 09412861008**  
**Soc. soggetta a controllo e coordinamento da Fleming 2009 S.r.l.**  
**Cap. Soc. Euro 12.000**  
**PEC: [alfahotel2007@legalmail.it](mailto:alfahotel2007@legalmail.it)**  
**R.E.A. 1160693 / Reg. Imp. 09412861008**

## **Information on the processing of personal data of users of the website [www.grandhotelfleming.it](http://www.grandhotelfleming.it)**

Articles 13 and 14 of Regulation 2016/679 / EU (hereafter also "GDPR")

### **Why do we collect information?**

ALFA HOTEL 2007 Srl (hereinafter also referred to as "ALFA HOTEL 2007" or "Controller") is committed to respecting and protecting your privacy and wishes you feel safe both during the simple browsing of the site and in case you decide to register by providing your personal data to use the services made available to its Users and/or Customers. On this page ALFA HOTEL 2007 intends to provide some information on the processing of personal data relating to users who visit or consult the website accessible by electronic means from the address <http://www.grandhotelfleming.it>(the "Site"). The information is provided only for the website of the Controller not for other websites that may be consulted by the user through links (for which reference is made to the respective privacy policies). Reproduction or use of pages, materials and information contained within the Site, by any means and on any medium, is not permitted without the prior written consent of ALFA HOTEL 2007. Copying and/or printing for use only personal and non-commercial (for requests and clarifications, contact the owner at the addresses indicated below). Other uses of the content, services and information on this site are not permitted.

With regard to the content offered and the information provided, ALFA HOTEL 2007 will ensure that the contents of the Website are kept up-to-date and revised without offering any guarantee as to the adequacy, accuracy or completeness of the information provided explicitly declining any responsibility for any omission errors in the information provided on the Website.

### **Origin - Navigation data**

ALFA HOTEL 2007 informs you that the personal data you provide and acquired together with the request for information and/or contact, registration on the site and use of services via smartphones or any other instrument used to access the Internet, as well as data necessary for the provision of these services, including the navigation data and data used for the eventual purchase of the products and services offered by ALFA HOTEL 2007 but also the data only "navigation" of the site by Users, will be treated in compliance with applicable law. The computer systems and software procedures used for the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of the Internet. This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified as navigators. This category of data includes the "IP addresses" or domain names of the computers used by users who connect to the site, the addresses in the URI's (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used in the submit the request to the web server, the file size obtained in response, the numerical code indicating the status of the response given by the web server (success, error, etc.) and other parameters related to the operating system and the computer environment of the user. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and for checking the correct operation of the ALFA HOTEL 2007 website. Please note that the aforementioned data could be used to ascertain responsibility in the case of computer crimes. against the site of the owner or to other sites connected to it or connected to it.

### **Origin - Data supplied by the user**

ALFA HOTEL 2007 collects, stores and processes your personal data in order to provide the products and services offered on the Site, or for legal obligations. With regard to some specific Services, Products, Promotions, etc. the Data Controller may process your data for commercial purposes. In such cases, a specific, separate, optional and always revocable consent will be required with the methods and the contact details indicated below. The optional, explicit and voluntary sending of emails to the addresses indicated in the appropriate section of the Website, as well as the compilation of questionnaires (for example form), communication via chat, push notification via APP, social networks, call centers, etc., involves the subsequent acquisition of some of your personal data, including those collected through the use of Apps and related services, necessary to respond to requests. We also point out that when using the mobile connection to access digital content and services offered directly by ALFA HOTEL 2007 or by our partners it may be necessary to transfer your personal data to such third parties. We point out that you may access the Site or connect to areas where you may be able to publish information using blogs or bulletin boards, communicate with others, for example coming from the web page of ALFA HOTEL 2007 on Facebook®, Google +®, Twitter®, and other sites social networks, reviewing products and offers and posting comments or content. Before interacting with these areas, please read the General Conditions of Use carefully taking into account that, under certain circumstances, the information published can be viewed by anyone with access to the Internet and all the information you include in your publications can be read, collected and used by third parties. We may process data of a particular/sensitive nature as defined by the GDPR provided by you voluntarily in the notes field of the booking form, because they are instrumental to the provision of our services (food allergies, disabled people, health information, etc.). Such data will be processed in accordance with the General Authorization of the Guarantor for the protection of personal data n. 5 and will be treated by us in strict confidence and will not be disseminated.

#### CONTACT USER - ADDRESS MANAGEMENT AND SENDING OF EMAIL MESSAGES:

##### Mailing List or Newsletter

This type of service allows us to manage a database of email, telephone or of any other type of contacts data, used to communicate with the User.

These services may also allow us to collect data relating to the date and time the messages are displayed by the User, as well as to the User's interaction with them, such as information on clicks on the links inserted in the messages.

#### INTERACTION WITH THE HOTEL THROUGH LIVE-COBOOKING PLATFORM:

This platform, if enabled, allows the hotel to communicate with the visitor through a chat on the site with the ability to interact via popup and activate a co-browsing session to display the browser window and assist it in navigation. This platform does not collect or display sensitive data and the navigation data collected is limited to the window of the official website of Grand Hotel Fleming and to the booking platform HOTELEASYRESERVATIONS.COM. Other data such as IP are detected anonymously and are therefore neither registered nor communicated to the structure.

#### INTERACTION WITH SOCIAL NETWORK AND EXTERNAL PLATFORMS:

This type of services allow interactions with social networks, or other external platforms, directly from the pages of this Application.

The interactions and information acquired by this Application are in any case subject to the User's privacy settings related to each social network.

If an interaction service with social networks is installed, it is possible that, even if the Users do not use the service, the same collect traffic data relating to the pages in which it is installed.

Like button and Facebook social widgets (Facebook, Inc.)

The 'Like' button and Facebook social widgets are services of interaction with the social network Facebook, provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy

+1 button and Google+ social widgets (Google Inc.)

The +1 button and Google+ social widgets are services for interacting with the Google+ social network, provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: USA - Privacy Policy

Tweet button and Twitter social widgets (Twitter)

The Tweet button and Twitter social widgets are services of interaction with the Twitter social network, provided by Twitter Inc.

Personal Data collected: Cookies and Usage Data.

Place of treatment: USA - Privacy Policy

## **Purposes of processing and legal basis**

The data are processed for the purposes:

- 1) strictly connected and necessary to make a reservation on the website [www.grandhotelfleming.it](http://www.grandhotelfleming.it), to the services and/or Apps developed or made available by the Data Controller, to the use of the related information services, to the management of contact requests or information,
- 2) for ancillary activities related to the management of User/Customer requests and sending the feedback that may include the transmission of promotional material; for the refinement of the reservation, including the aspects related to payment by credit card, the update on the availability of rooms and services temporarily unavailable;
- 3) use the credit card issued as guarantee for any charge as a penalty in the event of cancellation after the deadline to exercise the right of withdrawal defined in the booking confirmation, or in case of failure to arrive at the agreed date (procedure of no show);
- 4) related to the fulfillment of obligations under EU and national regulations, the protection of public order, the detection and prosecution of crimes and safeguarding the rights of ALFA HOTEL 2007 as well as to comply with current administrative, accounting and tax obligations;
- 5) direct marketing, namely sending of advertising material, direct sales, carrying out market research or commercial communication of products and / or services offered by ALFA HOTEL 2007; this activity may also concern products and services of LO.AN Group companies and be performed by sending advertising/informative/promotional material and/or invitations to participate in initiatives, events and offers aimed at rewarding users / customers, carried out using "traditional" methods (for example, paper mail and/or calls from an operator), or through "automated" contact systems (for example SMS and / or MMS, telephone calls without operator intervention, e-mail, fax, interactive applications), pursuant to art. 130 c. 1 and 2 of Legislative Decree. 196/03 and s.m.i.;
- 6) direct marketing, namely sending of advertising material, direct sales, carrying out market research or commercial communication of products and/or services offered by Fleming 2009 srl - Lo. AN and Nari Consulting srl and be performed by sending advertising/informative/promotional material and/or invitations to participate in initiatives, events and offers aimed at rewarding users/customers, carried out using "traditional" methods (by way of exemplary paper mail and/or operator calls), or through "automated" contact systems (for example SMS and / or MMS, telephone calls without operator intervention, e-mail, fax, interactive applications), pursuant to art. 130 c. 1 and 2 of Legislative Decree. 196/03 and s.m.i..

The provision of data for the purposes referred to in points 1), 2), 3) and 4) connected to a pre-contractual and/or contractual phase or functional to a user's request or required by a specific regulatory provision, is mandatory and, failing that, it will not be possible to receive the information and access the services requested; with regard to point 5) and 6) of this Information, the consent to the processing of data by the user /customer is instead free and optional and always revocable without consequences on the usability of the products and services except the impossibility for the owner to keep updated on new initiatives or on

particular promotions or advantages available to users/customers. ALFA HOTEL 2007 may send commercial communications relating to products and/or services similar to those already provided, pursuant to Directive 2002/58/EU, using the electronic or paper coordinates, indicated by you on such occasions to which you may object in the manner and at the addresses indicated below.

### **Methods, treatment logics, storage times and security measures**

The processing is also carried out with the aid of electronic or automated means and is carried out by ALFA HOTEL 2007 and/or by third parties of which ALFA HOTEL 2007 may use to store, manage and transmit the data. The processing of data will be carried out with the logic of organization and processing of your personal data, including the logs originating from access and use of services made available via the web, products and services used related to the purposes indicated above and, however, so to guarantee the security and confidentiality of data. The personal data processed will be kept for the time required by the legislation in the applicable time.

Always with regard to data security, in the sections of the website set up for particular services, where personal data are requested from the user, the data is encrypted using a security technology called Secure Sockets Layer, abbreviated to SSL. The SSL technology encodes the information before it is exchanged via the Internet between the user's computer and the central systems of ALFA HOTEL 2007, making them unintelligible to unauthorized parties and thus guaranteeing the confidentiality of the information transmitted; moreover, the transactions carried out using electronic payment instruments are carried out using the payment service provider's platform (PSP) directly and the Owner retains only the minimum set of information necessary to manage any disputes. In particular with reference to the personal data protection aspects, the user/customer is invited, pursuant to art. 33 of the GDPR to report to ALFA HOTEL 2007 any circumstances or events from which a potential "breach of personal data (data breach)" may occur in order to allow an immediate evaluation and the adoption of any actions aimed at combating such event by sending a communication a [privacy@grandhotelfleming.it](mailto:privacy@grandhotelfleming.it) or by contacting Customer Service. The measures adopted by ALFA HOTEL 2007 do not exempt the Customer /User from paying the necessary attention to the use, where required, of a password/PIN of adequate complexity, which will have to be updated periodically, especially if he was supposed to be violated/known by third parties, as well as carefully guard and make inaccessible to third parties, in order to avoid improper and unauthorized use.

### **Cookies**

A cookie is a short string of text that is sent to your browser and possibly saved on your computer (alternatively on your smartphone / tablet or any other tool used to access the Internet); this submission generally occurs every time you visit a website. ALFA HOTEL 2007 uses cookies for various purposes, in order to offer you a fast and secure digital experience, for example, allowing you to keep the connection to the protected area active while browsing through the pages of the site.

Cookies stored on your terminal can not be used to retrieve any data from your hard disk, transmit computer viruses or identify and use your e-mail address. Each cookie is unique in relation to the browser and device you use to access the Website or use the App of ALFA HOTEL 2007. In general, the purpose of cookies is to improve the functioning of the website and the user experience in using of the same, even if cookies can be used to send advertising messages (as specified below). For more information on what cookies are and how they work, you can consult the website "All about cookies" <http://www.allaboutcookies.org>.

For detailed information on Cookies, read the dedicated page (<https://www.grandhotelfleming.it/en/cookie/>)

### **Areas of communication and data transfer**

For the pursuit of the aforementioned purposes, ALFA HOTEL 2007 will be able to communicate and have the personal data of users /customers deal with third parties with whom we have relationships, where these third parties provide services at our request. We will provide these third parties with only the information necessary to perform the services required by taking all measures to protect your personal data. The data may be transferred outside the European Economic Area if this is necessary for the management of your contractual relationship. In this case, the recipients of the data will be imposed security and security obligations equivalent to those guaranteed by the Data Controller. In the case of use of services offered directly by Partners we will provide only the data strictly necessary for their execution. In any case, only the data necessary for the achievement of the intended purposes will be communicated and, where required, the guarantees applicable to transfers of data to third countries will be applied. We may also disclose personal data to our suppliers of commercial services, for marketing reasons, for this purpose appointed external

processors. In addition, personal data may be disclosed to the competent public bodies and authorities for compliance with regulatory requirements or for ascertaining responsibility in the case of computer crimes to the detriment of the site as well as communicated to, or allocated to, third parties (as responsible or, in the case of providers of electronic communication services, autonomous owners), who provide information and telematic services (for example hosting, management and development of websites) of which ALFA HOTEL 2007 makes use of tasks and activities of a technical and organizational nature that are instrumental to the functioning of the website. The subjects belonging to the above categories operate as separate Data Controllers or as Processor appointed for this purpose by ALFA HOTEL 2007.

Personal data may also be known by ALFA HOTEL 2007 employees / consultants who are person acting under the authority of the Controller or of the Processor specifically instructed and appointed as “Incaricato del trattamento”.

### **Rights of the data subject**

You can exercise at any time the rights that are recognized by law, including that: a) to access your personal data, obtaining evidence of the purposes pursued by the Owner, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes; b) to obtain without delay the correction of inaccurate personal data concerning you; c) to obtain, in the cases provided for, the deletion of your data; d) to obtain the limitation of the treatment or to oppose it, whenever possible; e) to request the portability, where applicable to processing, of the data you have provided to ALFA HOTEL 2007, i.e. to receive them in a structured format, commonly used and readable by automatic device, also to transmit this data to another holder, within the limits and with the constraints envisaged by art. 20 of the GDPR;

Furthermore, you may propose a complaint to the Supervisory Authority pursuant to art. 77 of the GDPR. For the treatments referred to in point 5) and 6) of the purposes, the Customer can always withdraw the consent and exercise the right to oppose direct marketing (in "traditional" and "automated" form). The opposition, in the absence of a contrary indication, will be referred to both traditional and automated communications.

### **The Data Controller and the Personal Data Protection Officer**

The data controller is ALFA HOTEL 2007 SRL based in Piazza Monteleone di Spoleto, 20 - 00191 Rome. The rights indicated above may be exercised at the request of the interested party in the manner disclosed on the Company's website or by using the following references: ALFA HOTEL 2007. -Ref. Privacy- Piazza Monteleone di Spoleto, 20 - 00191 Rome, e-mail: [privacy@grandhotelfleming.it](mailto:privacy@grandhotelfleming.it).

The use of the Website, including those intended for tablets and / or smartphones, by the Customer and / or the User implies full knowledge and acceptance of the content and any indications included in this version of information published by the Owner in the when the site is accessed.

ALFA HOTEL 2007 informs that this notice may be changed without prior announcement and therefore recommends a periodic reading.

ALFA HOTEL 2007 and the other companies of the LO.AN Group use the booking platform HOTELEASYRESERVATIONS is managed by the company EasyConsulting S.r.l. based in Via Nicolò III n. 4 00165 Rome (<http://www.easyconsulting.com>), which guarantees IT management activities (website hosting and IT security measures) and operation and maintenance.

This privacy statement was updated in June 2018