

## Privacy Policy – Elite Hotel

Last update: 07/03/2025

**What is this document?** Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, Elite S.r.l. intends to inform each user (the “**User**”) about the processing of personal data happening on its website elitehotel.it (“**Website**”)

### 1. Controller and Contact details

Elite S.r.l. (hereinafter, the “**Company**” or “**Controller**”, pursuant to art. 4(7) GDPR) with registered offices in Via Forte Marghera, 119 - 30173 Venezia Mestre.

Contact details: info@elitehotel.it

### 2. Purposes of processing, Legal Basis, Personal Data and Retention period

The Controller processes Personal Data for the following purposes, as specified here in below. The table also shows the legal basis which justifies the processing and the period of data retention.

	Purposes	Personal Data	Legal Basis	Data Retention
a.	<b>Management of the reservation</b> Data will be processed to allow you to manage your reservation.	✓ Anagraphic information (name and surname) ✓ Contact details (email and phone number) ✓ Payment information (credit card number)	Performance of contractual provisions [Art. 6, 1, lett. b) GDPR]	For as long as it is necessary to fulfill statutory retention obligations
b.	<b>Manage and process requests for information and support</b> The data provided will be processed to manage and respond to requests for information and technical support, as well as for the purpose of assisting you before, during, and after the provision of our services (including via instant	✓ Anagraphic information (name and surname) ✓ Contact details (email, phone number) ✓ Reservation details	Performance of pre-contractual and/or contractual measures [Art. 6, 1, lett. b) GDPR]	For the period necessary for response.

c.	<p><b>Direct marketing</b> The data provided will be processed for direct marketing activities i.e. for sending (via e-mail) communications having promotional and/or advertising content of the products or services offered by the Controller.</p>	<p>✓ Anagraphic information (name and surname) ✓ Contact details (email)</p>	Consent [Art. 6, 1, lett. a) GDPR]	Data will be retained until consent is withdrawn or processing is objected to, but no longer than 2 years from the date of last contact.
d.	<p><b>Fulfillment of legal obligations</b> Your data will be processed by the Controller in order to fulfill obligations arising from applicable laws, regulations or EU legislation (e.g. tax and accounting obligations) or management and response to requests from competent administrative and tax</p>	<p>✓ Anagraphic information (name and surname) ✓ Contact details (email)</p>	Legal obligation [Art. 6, 1, lett. c) GDPR]	Until the expiry of the data retention period, as provided by the applicable law.
e.	<p><b>Website Enhancement</b> The Controller will process Users' data to enable navigation, consultation of the Website, as well as to improve your</p>	✓ Website usage and interaction data	Legitimate interest [art. 6.1 f) GDPR] attributable to the Controller's need to enable the improvement of the Website.	Not applicable (aggregate or anonymous data).
f.	<p><b>Complaint handling, protection of interests and exercise of the right of defense</b> The Controller may process Users' data to exercise and protect their rights in extrajudicial and</p>	<p>✓ Anagraphic information ✓ Contact details</p>	Legitimate interest [Art. 6.1 (f) GDPR] attributable to the need to ascertain, exercise or defend a right and/or interest.	Personal data will be kept for the period necessary to defend or exercise the right.

The provision of your Data for the purposes sub a) and b) is necessary and obligatory so that, in case of refusal, we will not be able to follow up the contractual relationship with you and the related provision of the requested services.

The provision of your Data for the purposes sub c) is not mandatory. Your prior consent is therefore required, which the Company will request from time to time in the most appropriate form for each of the activities described above. In any case, the consent given is revocable by you at all times without any consequences with respect to your contractual relationship with the Company.

Processing activities under e) and f) do not require your specific consent as they are based on the legitimate interest of the Data Controller provided for in Article 6, c. 1, lett. f) of the GDPR. In any case, in accordance with the GDPR, we have carried out a thorough balancing of interests aimed at protecting and ensuring the privacy and fundamental rights of data subjects.

The use of some services of the Website may require the processing of personal data of third parties sent by you to the Controller. Compared to these assumptions, you act as an independent controller, assuming all the obligations and responsibilities of the law. In this sense, you grant the most extensive indemnity with respect to any dispute, claim, request for compensation for damage caused by treatment, etc. that may be received by the Controller from third parties whose personal data have been processed in violation of the law on the protection of personal data applicable. In any case, if you provide or otherwise process personal data of third parties in the use of the Website, you warrant as of now - assuming all related responsibility - that this particular case of treatment is based on a suitable legal basis under Art. 6 of the GDPR that legitimizes the processing of information in question.

### **3. Processing modalities**

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

### **4. Data Sharing**

Personal Data may be shared with the following external parties: i) Internet service providers and platforms used by the Data Controller as organizational tools, communication channels and/or online booking (e.g., Nozio S.r.l., booking engine provider); ii) consultants and other service providers who perform services for us or on our behalf and require access to such information to perform such work; iii) public entities to whom such data must be compulsorily disclosed due to legal provisions or orders of the Authority.

These subjects act as autonomous data controllers or data processors. In the latter case, the Controller has signed a contract pursuant to Art. 28 GDPR (Appointment as Data Processor).

The list of Data Processors can be obtained by contacting the Controller at the contact details given in paragraph 1 above.

Personal data will also be processed by the Controller's internal staff specifically authorised pursuant to Article 29 of the GDPR.

### **5. Data Processing Locations**

Personal data are processed at the headquarters of the Controller, as well as in the servers that host the Website *elitehotel.it*. Personal data are stored in servers located in the EU and will not be transferred outside the EU under any circumstances. The Data Controller ensures that when using cloud providers established outside the EEA, the processing of personal data by these recipients is carried out in accordance with applicable law. Transfers shall be carried out by means of appropriate safeguards,

such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

## **6. Data subject's rights**

The User may exercise all the rights provided for by Articles 15-21 of GDPR, at any time and without unjustified limitations, by contacting the Data Controller at [info@elitehotel.it](mailto:info@elitehotel.it). Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

- Obtain from the controller confirmation as to whether or not personal data are being processed (Art.15);
- Obtain from the controller the rectification of inaccurate personal data (Art. 16);
- Obtain from the controller the erasure of personal data (Art. 17);
- Obtain from the controller restriction of processing (Art. 18);
- Have the right to receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- Have the right to object (Art. 21);
- With regard to the purposes of processing based on consent, withdraw it at any time.

## **7. Complaints**

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller's processing of their Personal Data is in violation of the applicable law.

## **8. Amendments**

The Controller reserves the right to amend and update the Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.