



## CUSTOMER PRIVACY NOTICE

Pursuant to articles 13 and 14 of EU Regulation no. 2016/679 (hereinafter "GDPR"), relating to the protection of natural persons with regard to the processing of personal data and their free circulation, the undersigned Renaldi Simona, in the capacity of Data Controller, has the obligation to provide you with all the information relating to the purposes and methods of processing of your personal data, the indication of the subjects to whom your data may be communicated, and all the rights that the law recognizes in relation to the management of personal data by the Data Controller. We therefore invite you to take note of the information contained therein and to express your consent to the processing by signing this information.

### 1. Who determines the purposes and methods of processing?

The Data Controller.

The Data Controller is Renaldi Simona born in Senigallia (AN) on 7 February 1974 - Resident in via del Crocifisso, 171 - 60019 - Senigallia (AN) C.F. RNLSMN74B471608C / PIVA 02421040425 Email [info@ilgallosenone.it](mailto:info@ilgallosenone.it) Pec: [gallosenone@cia.legalmail.it](mailto:gallosenone@cia.legalmail.it) Legal and Operational Headquarters. Il Gallo Senone by Renaldi Simona via del Crocifisso, 171 - 60019 - Senigallia (AN)

### 2. What personal data is processed by the Data Controller?

The Data Controller will collect and process your personal data, that is, any information that can identify you and that is directly or indirectly attributable to you, such as, by way of example only:

1. Personal identification data;
2. Particular and sensitive data such as data relating to allergies and health conditions
3. Data relating to the stay;
4. Personal preferences;
5. Identification documents;
6. Autograph signature;
7. Purchase history;
8. Credit card and/or bank card data;
9. Video surveillance images;
10. Data relating to electronic devices used to connect to the network of the facility;
11. Data relating to telephone calls;
12. Access data and use of ICT resources.

and any other data that is necessary for achieving the purposes referred to in paragraph 4.

### 3. How is personal data collected?

Personal data is provided directly by the interested party to the Data Controller or collected through other entities such as:

- OTA (Online Travel Agency) such as, by way of example, [Booking.com](https://www.booking.com), [Venere.com](https://www.venere.com), [Worldhotels.com](https://www.worldhotels.com), [Trivago.com](https://www.trivago.com), [Expedia.com](https://www.expedia.com), etc.;
- Traditional travel agencies;
- Bodies, Associations, Organizations, Companies or individuals who organize events or stays in the facility;

### 4. Why do you collect my data?

Purpose of processing

The personal data collected by the Data Controller will be processed for the following purposes:

- a. Customer management;
- b. Contract signing and management;
- c. Administrative management;
- d. Litigation management;
- e. Customer care;
- f. Public relations
- g. Promotion, marketing and advertising;
- h. Protection of the physical health of individuals;
- i. Internal security;
- j. Protect and guarantee the safety and security of individuals;
- k. Protect the integrity of company property and assets;
- l. Allow the use and guarantee the security of the ICT infrastructure.

Legal basis of processing

The data will be processed in strict compliance with the legal provisions, according to the principles of lawfulness and correctness and in compliance with the right to confidentiality.

The data will be processed on the basis of:

- Expression of consent;
- Pre-contractual and contractual obligations;
- Legal obligations;
- Legitimate interest of the Owner.

### 5. How will the collected data be treated?

Methods of Processing

The processing will be carried out in an automated and manual manner, in compliance with the provisions of art. 32 of GDPR 2016/679 and in particular:

- a. Through operations that will allow the collection, registration, organization, storage, consultation, processing, modification, selection, extraction, use, communication, cancellation and destruction of the data.
- b. Through the use of electronic or in any case automated tools that allow the storage, management and transmission of the data, but always configured in such a way as to guarantee maximum confidentiality and the necessary protection.
- c. Through the use of documents contained on paper with the preparation of suitable custody measures that prevent knowledge of them by unauthorized persons.

### 6. Why should I provide my data to the Owner?

Can I refuse?

Nature of the provision of data and refusal to provide them

Where the provision of personal data is functional to the execution of a contract or the fulfillment of a legal obligation, the processing is indispensable and in the event of refusal to process the data subject to this information, the Data Controller will not be able to perform the activities referred to in paragraph 4 and in general will not be able to fulfill the obligations undertaken.

With regard to the purposes of the processing for which your consent is required, the refusal will not affect the obligations undertaken.

### 7. Who will know my data?

Data communication

Personal data may be transferred and processed by other parties, in the capacity of authorized, responsible or independent data controllers, in order to comply with pre-contractual, contractual, legal obligations, or for legitimate interest.

Categories of recipients could therefore be, by way of a purely indicative title:

- Persons in charge;
- Data Processors;
- System administrators;
- Accounting consultants;
- Legal consultants;
- Banks;
- Insurance institutions;
- Auditing firms;
- Hotel infrastructure maintenance services companies;
- Internet and email service suppliers;
- Public authorities;
- Police forces.

The data provided and collected by the Data Controller are not subject to public dissemination or profiling.

### 8. Could my data be transferred abroad?

Personal data may be transferred to countries of the European Union or to countries outside the European Union or to an international organization if this fulfillment is necessary for the achievement of the purposes of the activities referred to in paragraph 4 and to be able to fulfill the obligations undertaken.



#### 9. How long will my data be kept?

##### Storage

Personal data will be stored for the time strictly necessary to carry out the activities related to the purposes referred to in this information. In particular, the storage times will be:

- 10 years (as provided for by civil obligations - Art. 2220 of the Civil Code);
- 3 months maximum from the check-out date for credit card data;
- 3 years maximum from the last check-out for personal data, particulars, relating to the stay, personal preferences, identification documents, handwritten signature and purchase history and marketing data (Points 2.1 to 2.7), unless otherwise indicated by the interested party;
- 5 days maximum for video surveillance images;
- 90 days from check-out for telephone traffic data;
- 1 month for access and use data of ICT resources.

Without prejudice in any case to longer retention periods if provided for by specific sector regulations. In the event of disputes, personal data will be retained until the limitation period provided for by the legislation for the protection of rights connected to the contractual relationship.

#### 10. How can I intervene to limit, prevent or oppose the processing of my data by the Data Controller?

##### Rights of the interested party

With a specific written communication sent by certified e-mail or registered letter with return receipt to the address of the Data Controller, you have:

##### Right of access to data (Art. 15, GDPR)

Obtain from the data controller confirmation as to whether or not personal data concerning you is being processed and, where that is the case, obtain access to the personal data and certain information specifically indicated in art. 15 of the GDPR.

##### Right to rectification (Art. 16, GDPR)

Obtain from the data controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you also have the right to obtain the integration of incomplete personal data, including by providing a supplementary statement.

##### Right to erasure (Art. 17, GDPR)

Obtain from the data controller the erasure of personal data concerning you without undue delay and the data controller has the obligation to erase your personal data without undue delay, unless there are reasons preventing the exercise of the aforementioned right.

##### Right to restriction of processing (Art. 18, GDPR)

Obtain, where possible, the limitation of the processing of your personal data or revoke the consent previously given. The revocation of consent will not affect the lawfulness of the processing carried out previously.

##### Right to data portability (Art. 20, GDPR)

If the processing is based on consent or on a contract and is carried out by automated means, you have the right to receive the personal data you have provided to the controller in a structured, commonly used and machine-readable format and have the right to transmit them to another controller or have them transferred directly from the controller, if technically feasible.

##### Right to object (Art. 21, GDPR)

Object at any time, for reasons related to your particular situation, to the processing of personal data based on the legitimate interest of the owner or on your consent, including profiling, unless the owner demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over your rights.

#### Right that your data not be subjected to an automated decision-making process, including profiling (art. 22, GDPR)

Not to be subject to a decision based solely on automated processing that produces legal effects concerning you or similarly significantly affects you.

As expressed in paragraph 7, the Data Controller does not use automated decision-making processes.

#### Right to lodge a complaint with a supervisory authority (Art. 77, GDPR)

Without prejudice to any other administrative or judicial remedy, if you believe that the processing of your personal data violates this regulation, you may lodge a complaint with the Supervisory Authority and, more generally, exercise all the rights recognized by the current provisions of law.

#### 11. How long does it take to receive feedback from the Owner?

In the event of a request by you for information relating to your data, the Data Controller will respond as soon as possible - unless this proves impossible or involves a disproportionate effort - and, in any case, no later than 30 days from the request. Any impossibility or delays on the part of the Data Controller in satisfying the requests will be motivated.

#### 12. Effective date and effectiveness

This information must also be considered valid for positions opened before 05/20/2025.

Senigallia, May 20, 2025

The undersigned identified below declares to have received complete information pursuant to Articles 13 and 14 of EU Regulation 2016/679 and to have fully understood its contents.

To read the information

Name and Surname:

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#### DECLARATIONS OF CONSENT TO PROCESSING

**If you inform us of any health conditions, such as allergies, food intolerances, pathologies or other medical conditions (referred to as "sensitive data" according to Article 9 of EU Regulation 2016/679), it is necessary that you give us your explicit consent for the use of this information.**

**This will allow us to ensure you a personalized and safe hotel experience, while ensuring maximum attention to your health.**

☐ I authorize ☐ I do not authorize

Senigallia, date of sign .....

Readable Signature: .....