



INFORMATION ON THE PROCESSING OF PERSONAL DATA of the users who browse the website www.rosciolihotels.it pursuant to article 13 of EU Regulation 2016/679

This privacy policy ("Privacy Policy") describes the personal data processing activities performed by **Roscioli Hotels s.c.a.r.l.** through the website **www.rosciolihotels.it** and the related obligations assumed to that effect by the Company. Roscioli Hotels s.c.a.r.l. may process the personal data of the user when the latter visits the Website and uses the services and features therein. A specific information notice pursuant to art. 13 of EU Reg. 2016/679 is usually published in the sections of the Website where personal data are collected; the specific consent of the user is requested before the personal data are submitted. Where envisaged by EU Reg. 2016/679, the user's consent will be requested before processing their personal data.

Data Controller

The Data Controller is **Roscioli Hotels s.c.a.r.l.** based in Via Massimo D'Azeglio, 21 – 00184 Rome who may be contacted at the following e-mail address rh@legalmail.it, telephone 06.44875600.

Data Protection Officer (DPO)

The Controller has appointed a Data Protection Officer (DPO) who may be contacted at the following e-mail address: dpo@rhr.it.

Types of data being processed

Visiting and browsing the Website do not, in general, entail the collection and processing of the user's personal data, except for navigation data, as specified below.

The IT systems and the software procedures used for the operation of the website acquire, during their normal operation, certain personal data, the transmission of which is implicit in the use of Internet communication protocols (Internet domain and IP protocol, type of browser and operating system of the computer being used, date, time and dwell time on the website, pages viewed, search engines from which the user entered the website, if any). This information is not collected to be associated with identified data subjects; however, by its very nature, through processing and association with data held by third parties, it may be conducive to identifying users.

In addition to so-called "navigation data", personal data willingly provided by the user when they interact with the Website's features or ask to use the services offered on the Website may undergo processing.

Purposes of the processing

Navigation data are used solely to retrieve anonymous statistical information on the use of the website and to monitor its proper operation; the data may also be used to ascertain liability in case of hypothetical computer crimes against the website (legitimate interest of the Controller), for statistical purposes, to improve navigation and the website's contents.

Furthermore, and with the specific optional consent of the user, **Roscioli Hotels s.c.a.r.l.** may process the personal data for marketing purposes, that is to register the visitor for the newsletter and periodically send promotional material and/or commercial information pertaining to the services of the Company to the e-mail address provided.

Legal basis

This website processes the data mainly based on the users' **consent**. Consent is granted through the **banner at the bottom of the page**, or through the use or browsing of the website, by evidentiary conduct.

By using or browsing the website, visitors and users approve this privacy policy and consent to the processing of their data with the methods and for the purposes described.

Additional consent relating to the specific purposes of the services is collected through the contact forms or the forms used to request a service.

The provision of the data and, therefore, consent to the collection and processing of the data is optional. The User may **refuse consent** and **may, at any time, withdraw the consent** already granted (through the banner at the bottom of the page or the browser's cookie settings, or the Contact link). Denying consent, however, may make it impossible for the company to provide certain services and the experience of browsing the website would be impaired.

The data collected for the security of the website, the prevention of unlawful conduct, and for statistical purposes shall be processed based on the **legitimate interest** of the Data Controller.

Methods of Processing

Personal data will be processed in paper form and electronically, in compliance with the provisions of art. 32 of the GDPR 2016/679 on security measures, by duly appointed persons and in accordance with the provisions of art. 29 of the GDPR 2016/679.

Place of processing

The data shall be processed at the operating sites of the Controller and anywhere else the parties involved in the processing are located. The data shall be managed by the Controller or by third-party suppliers of technical services; for more information, please contact the Controller directly.

Data Retention Period

The Controller shall retain and process the personal data for the time needed for processing and dealing with the request received; thereafter the data shall be erased where their retention is not otherwise justified.

Security and quality of the personal data

Roscioli Hotels s.c.a.r.l. undertakes to protect the security of the user's personal data and shall comply with the provisions on security set by the applicable regulations in order to prevent loss of data, unlawful or illegitimate uses of the data, and unauthorised access thereto.

Furthermore, the IT systems and software used by the undersigned have been set up so as to minimise the use of personal and identification data; such data shall be processed only to achieve the specific purposes pursued at any given time.



Recipients of the Data

The data being processed shall not be disclosed to third parties. In relation to the purposes of processing mentioned above, the following persons may, however, become aware of your data:

- all persons whose right to access such data is recognised by the regulations;
- company employees in their capacity as "authorised persons"
- all private and/or public natural and/or legal persons to whom disclosure is necessary or fundamental for the performance of our activity and in the manner and for the purposes described above.
- External persons responsible for the website's maintenance

Mandatory or Optional Nature of Data Provision

Navigation data are not provided by the data subject but are acquired automatically by the website's technological systems; therefore, should you refuse to provide the personal data, the Controller would be unable to show you the contents of the Website. The provision of personal data by the user for marketing purposes is optional; refusal to provide them will not have any consequences.

Rights of the Data Subjects

With regard to the processing performed, your rights are laid down by articles 15-22 of the GDPR and you may, therefore, request access to your personal data and their rectification or erasure or the restriction of the processing that concerns you or the minor or the right to object to the processing of the data, as well as the right to portability of the data being processed in electronic format. Requests relating to the exercise of the rights must be sent to the Data Controller who will reply within the deadline set forth by art. 12 of the GDPR.

You may at any time lodge a complaint with the Italian Personal Data Authority, Piazza Venezia 11, 00187 Rome, garante@gpdp.it.

Automated decision-making processes

The Controller does not use automated decision-making processes to process the data.

Right to Withdraw Consent

If the processing is based on consent, the Controller informs the data subject that they have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent granted prior to withdrawal.