

## **Disclosure Article 13 EU Regulation 2016/679 ("Regulation") VOIhotels S.p.A. - Pre Check-In**

### **Owner and purpose of the treatment**

We inform you that, pursuant to art. 13 of EU Regulation 2016/679 (hereinafter, "Regulation"), your Personal Data are processed by VOIhotels S.p.A. based in Turin (TO) - Via Lugaro 15 as data controller ("Owner"). The Data Protection Officer (hereinafter, "DPO") can be reached at the following address: [dpo@voihotels.com](mailto:dpo@voihotels.com).

VOIhotels S.p.A. is a subsidiary of the Alpitour Group of which Alpitour S.p.A. is the parent company. The Data Controller will process your personal data as holder of the file (surname, name, date of arrival, booking number, gender, date and place of birth, province of residence, citizenship, data relating to the identity document and address) and personal data of any guests (surname, name, sex, date and place of birth, citizenship and possibly data relating to the identity document) for the purpose of:

#### **a) management of the "pre check-in" process and of your stay at our facility**

The legal basis of the processing is the execution of a contract of which the interested party is a party or the execution of pre-contractual measures adopted at the request of the same (Article 6.1.b of the Regulations).

Your data will be processed using manual, IT and / or telematic methods; the object of the processing could also be particular categories of personal data (pursuant to Article 9 of the Regulation - e.g. customer with disabilities), in which case the legal basis of their processing will be the expression of your explicit consent to the processing of such data for the purpose specified above, pursuant to art. 9.2.a) of the Regulations through a specific form.

It should be noted that the data collected and provided by you may also be related to your family members.

#### **b) fulfillment of regulatory obligations (in particular the communication of your data to the P.S. Authority), tax and accounting obligations**

The legal basis of the processing is the fulfillment of a legal obligation to which the Data Controller is subject (Article 6.1.c of the Regulations).

The provision of your data for the purposes referred to in letters a) and b) is necessary for the purpose of concluding the contract and fulfilling legal obligations.

### **Recipients of personal data**

Your Personal Data may be shared with:

- natural persons authorized by the Data Controller to process personal data;
- third parties for carrying out economic activities, some of which act as Data Processors (the complete and updated list of Managers is available on the website [www.voihotels.com](http://www.voihotels.com));
- subjects, bodies or authorities to whom it is mandatory to communicate your Personal Data by virtue of the provisions of the law or orders of the authorities.

As regards the possible transfer of Data to Third Countries, the Data Controller announces that the processing will take place according to one of the methods allowed by the law in force, such as the consent of the interested party, the execution of a contract concluded between the interested party and the data controller or the execution of pre-contractual measures adopted at the request of the interested party; the conclusion or execution of a contract stipulated between the data controller and another natural or legal person in favor of the data subject; the adoption of Standard Clauses approved by the European Commission, the selection of subjects operating in countries considered safe by the European Commission. It is possible to have more information, upon request, from the Data Controller at the contacts indicated above.

### **Retention of personal data**

Your Personal Data will be kept only for the time necessary for the purposes for which they are

collected, respecting the principle of minimization referred to in Article 5, paragraph 1, letter c) of the GDPR. In any case, your personal data will be kept for the time necessary for the execution of the services provided for in the contract. In any case, the further conservation provided for by the applicable legislation, including that provided for by art. 2946 cod. civ. More information is available from the Data Controller.

**Privacy rights of the interested party (pursuant to Articles 15 et seq. Of the Regulation)**

You have the right to ask the Data Controller, at any time, to access your data, to rectify or delete them, to request the limitation of processing or to oppose it, to obtain in a structured format, in common use and the data concerning you can be read by an automatic device in the cases provided for by art. 20 of the Regulation.

Requests should be sent in writing to the Data Controller at [privacy.voi@alpitourworld.it](mailto:privacy.voi@alpitourworld.it) or to the Data Protection Officer ("DPO") at the address: [dpo@voihotels.com](mailto:dpo@voihotels.com).

In any case, you always have the right to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data), pursuant to art. 77 of the Regulation, if you believe that the processing of your data is contrary to the legislation in force.