

# Information notice pursuant to Article 13 of Regulation 2016/679 (EU)

## VOIhotels S.p.A

### Data controllers and purposes of the processing

With regards to the processing of your personal data (Article 4.1 of the Regulation) provided, we inform you that they will be processed by:

1. **VOIhotels S.p.A.**, with registered office in Torino, Via Lugaro, 15 - 10126, as Data Controller (hereinafter "**Data Controller**"). **VOIhotels S.p.A. is part of Alpitour Group.**

Data Controller will process your personal data for the following purposes:

a) **Management of your stay at our hotel**

**The legal basis of the processing is identified in the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (article 6.1.b) of the Regulation).**

Your Personal Data will be processed by way of manual and electronic methods; subject to the processing may also be special categories of personal data (pursuant to Article 9 of the Regulation - for example, a customer with disabilities), in which case the legal basis of their processing will be your **explicit consent** to the processing of such data for the purposes specified above, pursuant to art. 9.2.a) of the Regulation.

It should be noted that the data collected and supplied by you may also be related to any family members/guests/accompanies of yours

b) **Compliance with regulatory obligations** (particularly, the communication of your data to the public security authority), **tax and accounting obligations**

The legal basis of the processing is the compliance with a legal obligation to which the controller is subject (article 6.1.c) of the Regulation).

The provision of your personal data for the purposes referred to in letters a) and b) is mandatory for the execution of the contract and the compliance to legal obligations.

c) **To communicate data relating to your stay to third parties for the sole purpose of allowing the receipt of messages and phone calls addressed to you**

The legal basis of the processing is the consent by the data subject to the processing of his personal data (article 6.1.a) of the Regulation).

The provision of your personal data for the purposes referred to in letter c) is optional; there is no consequence for your refusal to provide it.

For the treatments carried out for the purpose of direct sending of its own advertising material or its own direct sales or for carrying out its own market research or commercial communications in relation to products or services of the Owner similar to those to be purchased, the latter can use, without the consent of the interested party, the e-mail and paper mail addresses pursuant to and within the limits permitted by art. 130, paragraph 4 of Legislative Decree 196/03 and by the provision of the Guarantor Authority for the protection of personal data of 19 June 2008.

The legal basis for the processing of your data for this purpose is art. 6, paragraph 1, lett. f) of the Regulation. The interested party has the possibility to oppose this treatment at any time, initially or during subsequent communications, easily and free of charge, by writing to the address: [privacy.voi@alpitourworld.it](mailto:privacy.voi@alpitourworld.it).

If, in any case, you wish to oppose the processing of your data for marketing purposes carried out with the means indicated here, as well as revoke the consent given; you may do so at any time by contacting the Data Controller at the addresses indicated in this statement, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

The provision of your Personal Data for the purpose above is optional; there is no consequence for your refusal to provide it.

### Recipients and transfer of personal data

Your Personal Data may be shared with:

- natural persons authorized by the Data Controller to process Personal Data;
- Alpitour S.p.A. as parent company of Alpitour Group of which Data Controller is part
- third parties for the performance of economic activities, some of which act as Data Processors (the complete and updated list of data processor is available on the website [www.voihotels.com](http://www.voihotels.com));
- persons, bodies or authorities to whom/which it is mandatory to communicate your Personal Data pursuant to legal provisions or orders from the authorities.

As regards the possible transfer of data to third countries, the Data Controller announces that the treatment will take place according to one of the methods permitted by current law, such as for example 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 interested party; 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 obtain further information, upon request, from the Data Controller at the contacts indicated above.

### Storage 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 to perform the services provided for in the contract. In any case, the further conservation required by law is reserved

Your privacy rights pursuant to Articles 15 et seq. of the Regulation

You have the right to ask the Data Controller, at any time, for access to your Data, for rectification or cancellation of the same, to request the limitation of processing or to oppose it, to obtain in a structured format, commonly used and readable by automatic device the data concerning you in the cases provided for by art. 20 of the Regulation.

You can revoke at any time pursuant to art. 7 of the Regulation, the consent already given, without this affecting the lawfulness of the processing carried out prior to the withdrawal of consent.

Requests must be sent in writing to the Data Controller at the address [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.

- 2. Alpitour S.p.A.**, with registered office in Torino, Via Lugaro 15 - 10126, that will process your Personal Data, not including special categories of personal data and with you consent, as Data Controller. **Alpitour S.p.A. is parent company of Alpitour Group of which VOIhotels S.p.A. is part.**

The Data Controller, with your specific consent, will process your personal data provided as file holder (name, surname, email address, hotel stay) and collected by VOIhotels in the check-in process for the purpose of:

- a) sending, with automated tools (email; telephone without operator - e.g. sms, mms, push notifications) and non-automated (paper mail; telephone with operator), newsletters and promotional communications on Alpitour products and initiatives, including those aimed at conducting market research and participating in prize shows and events organized by Alpitour.** It should be noted that the Data Controller collects a single consent for the marketing purposes described here, pursuant to the General Provision of the Guarantor for the Protection of Personal Data "Guidelines on promotional activities and the fight against spam" of 4 July 2013.

The legal basis for the processing of your data for the aforementioned purpose is the expression of consent by the interested party to the processing of their personal data for the purpose specified above, pursuant to art. 6.1a) of the Regulation.

The interested party has the possibility to revoke the consent given and to oppose this treatment at any time in an easy and free way, by writing to the Privacy Service at the Data Controller's address: [privacy@alpitourworld.it](mailto:privacy@alpitourworld.it).

The provision of your Personal Data for the purposes referred to in letter a) is optional; there is no consequence for your refusal to provide it.

- b) profiling also with the aid of electronic tools, aimed at analyzing the data subject's consumption habits or choices, to personalize messages addressed to customers**

The legal basis for the processing of your data for the aforementioned purpose is the expression of consent by the interested party to the processing of their personal data for the purpose specified above, pursuant to art. 6.1a) of the Regulation.

The interested party has the possibility to revoke the consent given and to oppose this treatment at any time in an easy and free way, by writing to the Privacy Service at the Data Controller's address: [privacy@alpitourworld.it](mailto:privacy@alpitourworld.it).

Failure to provide data and/or consent for this purpose will not affect the use of the services offered and will have no consequences.

### Recipients and transfer of personal data

Your Personal Data may be shared with:

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

As regards the possible transfer of data to third countries, the Data Controller announces that the treatment will take place according to one of the methods permitted by current law, such as for example 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 interested party; 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 obtain further information, upon request, from the Data Controller at the contacts indicated above.

### Storage of personal data

Personal Data will be kept only for the time necessary for the purposes for which they are collected, respecting the principle of minimization pursuant to article 5, paragraph 1, letter c) of the GDPR. For treatments that require consent as a legal basis, the data will be kept until the consent is revoked. The data processed for profiling purposes are automatically deleted every 10 years; the possibility remains for the interested party, at any time, to oppose the profiling treatment pursuant to art. 21.2 GDPR and request the cancellation of the aforementioned data.

Further information is available from the Owner.

### Your privacy rights 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 cancel them or to request the limitation of processing, or to obtain them in a structured format, commonly used and readable by automatic device the data concerning you in the cases provided for by art. 20 of the Regulation.

We also inform you that you have the right to object pursuant to art. 21 of the Regulation, for legitimate reasons, to the processing of data, for example, you may oppose at any time the sending of direct marketing with automated tools (email; telephone without operator - e.g. sms, mms, push notifications) and not (paper mail , telephone with operator); moreover, the possibility of exercising this right in part remains unaffected, i.e., in this case, by opposing, for example, only the sending of promotional communications via automated tools.

You can revoke at any time pursuant to art. 7 of the Regulation, the consent already given, without this affecting the lawfulness of the processing carried out prior to the withdrawal of consent.

Requests must be sent in writing to the Data Controller's Privacy Service at the address [privacy@alpitourworld.it](mailto:privacy@alpitourworld.it) or to the Data Protection Officer ("DPO") at the address: [DPO@alpitourworld.it](mailto:DPO@alpitourworld.it)

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.