Information – Art 13 EU Regulation 2016/679 ("Regulation") PRE CHECK-IN

Data Controllers and Purposes of Processing

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**. with registered office in Turin (TO) - Via Lugaro 15 as data controller ("**Controller**"). The Data Protection Officer (hereinafter, "DPO") can be reached at the following address: 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 the holder of the practice (surname, name, date of arrival, booking number, gender, date and place of birth, province of residence, citizenship, data relating to the identity document, address of residence, telephone number and email) and the personal data of any family members/guests/companions (surname, name, gender, date and place of birth, citizenship and possibly data relating to the identity document) for the purposes of:

a) management of the "pre-check-in" process and your stay at the hotel

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

Your data will be processed using manual, computerized and/or telematic methods; the object of the processing may also be special categories of personal data (pursuant to art. 9 of the Regulation - e.g. disabled customer), 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 Regulation via a specific form.

Please note that the data collected and provided by you may also relate to any of your family members/guests/companions.

b) fulfillment of regulatory obligations (in particular the communication of your data to the Public Safety 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 (art. 6.1.c of the Regulation).

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

c) communicate the data relating to your stay to third parties for the exclusive purpose of allowing the receipt of messages and telephone calls addressed to you

The legal basis of the processing for the purposes set out above refers to the expression of consent by the interested party to the processing of their personal data (art. 6.1.a of the Regulation).

The provision of your Personal Data for the purpose referred to in letter c) is optional; there are no consequences in the event of your refusal.

d) A unique identifier is automatically generated when a user profile is created. Information provided to the Data Controller and to companies within the Group—whether at the time of profile creation or during subsequent interactions—is linked to this identifier, in accordance with the respective privacy policies issued by each entity in its capacity as an independent Data Controller. This identifier is used to ensure data consistency, accuracy, and synchronization whenever a user engages with one or more companies within the Alpitour Group (e.g., by subscribing to a newsletter or purchasing one or more services)**. This processing is based on the Data Controller's legitimate interest. Data used solely for the purpose of linking a user to a unique identifier** (which may consist of the user's first name, surname, and date of birth; email address; or telephone number, depending on the case) **may be accessed by other companies within the Group for administrative and accounting purposes, pursuant to Article 6(1)(f) and Recitals 47 and 48 of the Regulation, while adhering to the data minimization principle set forth in Article 5(1)(c) of the Regulation.**

For the processing carried out for the purpose of directly sending its own advertising material or direct sales or for carrying out its own market research or commercial communications in relation to products or services of the Data Controller similar to those purchased, the latter may use, without the consent of the interested party, the email 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 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, letter f) of the Regulation. The interested party has the possibility to oppose such processing at any time, initially or on the occasion of subsequent communications, easily and free of charge, by writing to the address: 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 information, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

The provision of your Personal Data for the above purpose is optional; there are no consequences in the event of your refusal.

Furthermore, your personal data will be processed, with your specific consent, for the following purposes:

e) sending, with automated tools (e-mail; telephone without operator - e.g. sms, mms, push notifications)**, of newsletters and promotional communications on the products and initiatives of Voihotels, including those aimed at conducting market research and participation in prize competitions and events organised by Voihotels**. Please note 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 of the processing for the purpose referred to in letter e) is the expression of consent by the interested party to the processing of their personal data (art. 6, par. 1, letter a GDPR).

The interested party has the possibility to revoke the consent given and to oppose such processing at any time in an easy and free manner, by writing to the Privacy Service at the Data Controller at the address: privacy.voi@alpitourworld.it.
Failure to provide data and/or consent for this purpose will not affect the use of the services offered and will not have any consequences.

f) analyze the details of your purchases (e.g. types of payment instruments, your responses to market research, purchase volume, travel destinations, etc.) **and/or your browsing and usage behavior of our sites and the Application, in order to define a profile of your preferences, for statistical and/or commercial and marketing purposes.**

The legal basis of the processing for the purpose referred to in letter f) is the expression of consent by the interested party to the processing of their personal data (art. 6, par. 1, letter a GDPR).
Failure to provide data and/or consent for this purpose will not affect the use of the services offered and will not have any consequences.

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 the performance of economic activities, some of whom act as Data Processors (the complete and updated list of Processors is available on the website www.voihotels.com);
- persons, entities or authorities to whom it is mandatory to communicate your Personal Data by virtue of provisions of law or orders of the authorities.

With regard to the possible transfer of Data to Third Countries, the Data Controller hereby informs that the processing will take place according to one of the methods permitted by applicable 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 adhering to international programs for the free circulation of data or 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.

Data subject's privacy rights (pursuant to Articles 15 and following of the Regulation)
You have the right to ask the Data Controller, at any time, for access to your Data, for its rectification or erasure, to request the limitation of processing or to object to it, to obtain in a structured, commonly used and machine-readable format the data concerning you in the cases provided for by Article 20 of the Regulation.

We also inform you that, pursuant to Article 21 of the Regulation, you have the right to object at any time to the processing of personal data concerning you, carried out for direct marketing purposes, including profiling.

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

Requests must be addressed in writing to the Data Controller at privacy.voi@alpitourworld.it or to the Data Protection Officer (“DPO”) at: 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.