

Information – Art 13 EU Regulation 2016/679 (“Regulation”) VOIhotels S.p.A. – Captive Portal Wifi

Data Controller and Purpose of Processing

Pursuant to EU Regulation 2016/679 (hereinafter: “Regulation”), we inform you that your personal data provided through the WiFi Access Portal (name, surname, gender, date of birth, and possibly e-mail address, language and country), will be processed by **VOIhotels S.p.A.**, with registered office in Via Lugaro, 15 - 10126 Turin (TO), as Data Controller (hereinafter “Controller”). 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 data for the purposes of:

a) provision of the internet access service (hotspot service) in the areas of the hotel covered by access points. Registration can be done using the credentials provided by a third party, through **Social Login** services (a method through which the user automatically shares his/her personal data entered in a social network) through the use of Facebook, Twitter, LinkedIn accounts.

In this case, you are required to check the settings of that service and carefully read the privacy policy of the third party provider, as you may authorize the third party provider to share your personal data and authorize the Data Controller to collect information such as contacts.

The Data Controller acquires and stores the following data related to the user's account with the third party service: name, surname, gender, email address, storage will take place for as long as necessary to provide the requested services.

The data collected also includes log files (login and logout).

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

b) defensive purposes

The legal basis of the processing is the pursuit of the legitimate interest of the Data Controller (art. 6.1.f of the Regulation), which materializes in the exercise or defense of a right in court.

The provision of your Personal Data for the above purpose is optional, but otherwise it will not be possible to provide the internet access service.

In addition, your personal data (name, surname, e-mail address) will be processed, with your specific consent, for the following purpose:

c) sending, with automated tools (e-mail; telephone without operator - e.g. sms, mms, push notifications), **of newsletters and promotional communications on Voihotels products and initiatives, including those aimed at conducting market research and participation in prize competitions and events organized by Voihotels. It is specified 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 purpose referred to in letter c) is the expression of consent by the interested party to the processing of their personal data for the purpose specified above, pursuant to art. 6.1.a) of the Regulation.

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.

Finally, your personal data (name, surname, date of birth, email address, language used to connect to the Wi-Fi access portal, accommodation facility) will be processed, with your specific consent, for the following purpose:

d) Communication of personal data to third parties (companies that offer excursion and tour services, vehicle rental, transfers and other companies of the Alpitour Group) for the purpose of sending, with automated tools, newsletters and promotional communications on their products and initiatives.

The list of companies to which the communication is addressed is available on the Data Controller's website - privacy area.

The legal basis of the processing for the purpose referred to in letter d) is the expression of consent by the interested party to the processing of his/her personal data (art. 6, par. 1, lett. a GDPR).

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

Recipients of personal data

Your Personal Data may be shared with:

- natural persons authorized by the Data Controller to process personal data;
- third-party entities under contract involved in the management of information systems and corporate web platforms, some of which act as Data Processors (art. 28 of the Regulation). (the complete and updated list of Processors is available on the website www.voihotels.com);
- subjects, bodies 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 any 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.

Storage of personal data

Your Personal Data will be stored 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 stored for the time necessary for the execution of the services provided for in the contract.

In particular:

- the account data and the related log files (login and logout) will be stored for a period of 8 days following the guest's departure date

The personal and contact data processed, with prior consent, for sending newsletters and promotional communications (purpose c)) will be stored until the consent is revoked. In any case, the further storage provided for by the applicable legislation is reserved, including that provided for by art. 2946 of the Civil Code. Further information is available from the Data Controller.

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 the correction or deletion of the same, to request the limitation of the processing or to oppose 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 you have the right to object, pursuant to Article 21 of the Regulation, for legitimate reasons, to the processing of data, for example you may object at any time to the sending of direct marketing with automated tools (e-mail; telephone without operator - e.g. SMS, MMS, push notifications); furthermore, the possibility of exercising this right in part remains intact.

At any time you may revoke, 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.