Information - Art 13 EU Regulation 2016/679 ("Regulation") VOIhotels S.p.A. - Check in

Data Controllers and Purposes of Processing

In relation to your personal data (art. 4.1 of the Regulation) provided, we inform you that they 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 Controller will process your data for the purpose of:

a) management of your stay at our facility

<u>The legal basis</u> 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 manually, electronically and/or telematically; the object of the processing may also be particular 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.

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

b) compliance with regulatory obligations (in particular the communication of your data to the Public Safety Authority), tax and accounting obligations

<u>The legal basis</u> 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 compliance with legal obligations.

c) communicating 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

<u>The legal basis</u> of the processing for the purposes referred to 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.

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 the Data Controller's products or services 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 object to 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 contact details 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.

In addition, your personal data will be processed, with your specific consent, for the following purpose:

d) 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.

<u>The legal basis</u> of the processing for the purpose referred to in letter d) 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.

e) 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.

<u>The legal basis</u> 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).

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) Communication of personal data to third parties (the 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 the Group companies to which the communication is addressed is available on the Data Controller's website - privacy area.

<u>The legal basis</u> for 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, lett. 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.

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 performance of the services provided for in the contract. in particular 10 years for personal data.

Furthermore:

- The personal and contact data processed, subject to consent, for sending newsletters and promotional communications (purpose d)) will be stored until the withdrawal of the consent;
- The data of the details of purchases and travel practices processed, subject to consent, for the purpose of profiling (purpose e)) are stored for 5 years or until the withdrawal of consent, if earlier; the interested party remains entitled, at any time, to oppose the profiling processing pursuant to art. 21.2 of the Regulation and request the deletion of the aforementioned data.

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 Owner.

Data subject's 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 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.

CONSENT FORMULAS INSERTED IN THE FORM

\square I consent to the processing of my personal data for the 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 organized by Voihotels

\square I consent to the processing of my personal data to analyze the details of purchases, (e.g. types of payment
instruments, my responses to market research, purchase volume, travel destinations, etc.) and/or browsing and
use behavior, of the sites and the Application, in order to define a profile of my preferences, for statistical and/or
commercial and marketing purposes

☐ I consent to the communication of my personal data to 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 of the Group to which the communication is addressed is available on the website of the
Data Controller - privacy area)