

hPRIVACY POLICY:  
INFORMATIVA APP VOIHOTELS Versione 2\_ENG del 06/08/2020

Dear User,

We invite you to read the texts of the following information about the processing of personal data::

## **A) Disclosure art 13 GDPR VOIhotels S.p.A.**

VOIhotels SpA, as Data Controller of personal data (hereinafter: "Data Controller") pursuant to the European Data Protection Regulation 2016/679 ("GDPR"), recognizes the importance of personal data protection and considers privacy and the protection of personal data one of the main objectives of its business.

We therefore invite you, before communicating any personal data to the Data Controller, to carefully read this Privacy Policy, as it contains important information on your privacy, protection of personal data and on the security measures adopted to guarantee confidentiality in full compliance with the applicable legislation. . Furthermore, this Privacy Policy:

- is intended as provided for the VOIhotels APP application (hereinafter: "Application");
- is also to be understood as information provided pursuant to art. 13 of the GDPR to those who interact with the Application;
- complies with Recommendation no. 2/2001 concerning the minimum requirements for online data collection in the European Union, adopted on 17 May 2001 by the "Article 29" Working Group\*\*\*

The Data Controller informs you that the processing of your personal data will be based on principles of correctness, lawfulness, transparency and the protection of your privacy and your rights. Your personal data will therefore be processed in accordance with the legislative provisions of the GDPR and of the Legislative Decree. 196/03 (Privacy Code) and the confidentiality obligations set forth therein.

### **INDEX**

Below we provide the index of this Privacy Policy so that you can easily find information regarding the processing of your personal data that interest you.

#### **1. OWNER AND RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA**

#### **2. PERSONAL DATA OBJECT OF TREATMENT**

*2.1 Navigation Data*

*2.2 Data provided voluntarily by the user*

*2.3 Information related to the use of SDK*

#### **3. PURPOSE OF THE PROCESSING AND COMPULSORY OR OPTIONAL NATURE OF DATA PROVISION**

#### **4. METHOD OF TREATMENT, SECURITY AND PLACE OF DATA PROCESSING**

#### **5. STORAGE OF PERSONAL DATA**

#### **6. COMMUNICATION AND DIFFUSION**

#### **7. YOUR RIGHTS**

#### **8. MODIFICATIONS**

#### **9. CONTACTS**

\*\*\*

## 1. OWNER AND RESPONSIBLE FOR DATA PROTECTION

Following consultation and use of the Application, data relating to identified or identifiable natural persons may be processed. The identification details of the Data Controller and manager of the Site and Application are as follows: Volhotels S.p.A., a company based in Via Lugaro, 15 Turin, VAT number, 04416641001 C.F. and registration with the Chamber of Commerce of n. 04416641001

VOIhotels S.p.A. is a subsidiary of the Alpitour Group of which Alpitour S.p.A. is the parent company.

The Data Protection Officer ("DPO") can be reached at the address: [dpo@voihotels.com](mailto:dpo@voihotels.com).

## 2. PERSONAL DATA OBJECT OF TREATMENT

### 2.1 Navigation Data

The computer systems and software procedures used to operate the Application acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the devices used by users who connect to the application, the URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

This data is used in order to obtain anonymous statistical information on the use of the Application and to check its correct functioning, to allow - given the architecture of the systems used - the correct provision of the various functions requested by the user, for security reasons and to ascertain responsibility in the event of hypothetical computer crimes against the Application or third parties.

Navigation data are saved for all users who interact with the Application, whether they are registered users or not.

### 2.2 Data provided voluntarily by the user

To access the features offered through the Application and reserved for registered users, login is required using the following personal data: name, surname, e-mail and data relating to your practice, such as the booking code / voucher and the date of arrival.

These data are provided voluntarily and will be treated in full compliance with data protection legislation. Failure to provide this data will have the only consequence of being unable to log in and access certain features.

The user is responsible for the correctness of the data entered in the profile and guarantees the correctness of the same.

### 2.3 Information relating to the use of the SDK

- Libreria React Native of Facebook Inc.
- Yarn package manager
- NPM package manager
- Expo SDK
- Firebase SDK

### **3. PURPOSE OF THE PROCESSING AND COMPULSORY OR OPTIONAL NATURE OF DATA PROVISION**

The data you provide us through the Application will be processed by the Data Controller for the following purposes:

**a) provision of obligations deriving from a contract of which the interested party is a party or to fulfill, before the conclusion of the contract, specific requests of the interested party.**

In particular,

i. login (The data provided during login will be compared with the information relating to your stay held by the Data Controller in order to confirm your access.);

Please remember to use this function only with trusted devices, whose origin is known and owned and for use by the file holder and their guests, and not through other people's tools, public or shared;

ii. access information on the selected facility

iii. make choices regarding your stay, such as booking the restaurants of the resort and / or the services

iv. Sending push notifications containing service information

The provision of your data for the purposes referred to in letter a) is optional, but failure to provide them could make it impossible for the required functions to function. We do not require consent to the processing of personal data for these purposes as "the processing is necessary for the execution of a contract of which the interested party is a party or for the execution of pre-contractual measures adopted at the request of the same" (see art. 6, par 1, lett.b GDPR).

### **b) fulfillment of obligations established by law, by a regulation or by community legislation**

The provision of your data for the purposes listed above (c) is mandatory. Failure to provide them would not allow the owner to meet the obligations established by law, by a regulation or by community legislation.

### **4. METHOD OF TREATMENT, SECURITY AND PLACE OF DATA PROCESSING**

Your personal data are processed by the Data Controller - or by third parties carefully selected for their reliability and competence as well as rightly appointed as data processors - limited to the achievement by the same of the purposes specified above, mainly with automated tools, but also in the form paper, for the time strictly necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access in full compliance with the provisions of art. 32 GDPR.

Your data will not be transferred to countries outside the European Union.

### **5. 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 for the execution of the services provided for in the contract.

In particular:

- The data provided by the user for login will be kept for 5 years.
- Restaurant and service reservation data will be kept for 5 years

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.

### **6. COMMUNICATION AND DIFFUSION**

Your personal data may be brought to the attention of subjects, bodies or authorities to whom communication is mandatory by virtue of provisions of law or regulation; employees or collaborators of the

Data Controller, belonging to the categories of administrative, commercial, legal, accounting or IT system administrators, depending on the treatment, who, operating under the direct authority of the latter, are appointed responsible or in charge of the treatment pursuant to art. 28 and 29 of the GDPR and receive adequate operating instructions in this regard.

The updated list of the categories responsible for the processing is available on the website of the Data Controller ([www.voihotels.com](http://www.voihotels.com)) under "Privacy" in the footer.

## 7. YOUR RIGHTS

Pursuant to articles 15 and following of the Regulations, the user has the right to request at any time, access to his personal data, the correction or cancellation of the same, to oppose the processing, to request the limitation of the processing in cases provided for by art. 18 of the Regulation, obtain the data concerning him in a structured format, commonly used and readable by an automatic device, in the cases provided for by art. 20 of the Regulation. At any time, it is possible to revoke pursuant to art. 7 of the Regulation the consent given; propose a complaint to the competent supervisory authority pursuant to Article 77 of the GDPR (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.

Requests should be sent in writing to the Privacy Service at the Data Controller at [privacy.voi@alpitourworld.it](mailto:privacy.voi@alpitourworld.it) or to the Data Protection Officer ("DPO") at the addresses indicated above.

## 8. MODIFICATIONS

The Owner may modify or simply update this Application Privacy Policy, in part or completely, also due to changes in the laws and regulations that govern this matter and protect your rights. These changes and updates to the Privacy Policy will be binding as soon as they are published. We therefore invite you to visit this section regularly to become aware of the most recent and updated version of this Privacy Policy so that you are always up to date on the information we collect and on the use we make of it.

Last update: **10/06/2024**

## 9. CONTACTS

If you wish to receive any information on the processing of your data by the Data Controller, you can send a communication to the following address: [privacy.voi@alpitourworld.it](mailto:privacy.voi@alpitourworld.it).

## B) Disclosure art 13 GDPR Alpitour S.p.A.

Alpitour SpA, with registered office in Via Lugaro, 15 -10126 Turin, parent company of the Alpitour Group of which VOIhotels is a part, as Data Controller (hereinafter "Data Controller") will process your personal data with your specific consent, for the purposes of

- a) **sending promotional and marketing communications, including the sending of newsletters and market research, through automated tools (email) and not (paper mail)**, telephone with operator); 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; 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 can do so at any time by contacting the Data Controller at the addresses indicated in this statement, without prejudice to the lawfulness of the treatment based on the consent given before the revocation;

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

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 Data Controller's Privacy Service at the 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 of personal data**

Your Personal Data may be shared with:

- persons authorized by the Data Controller to process personal data;
- contracted third parties, some of whom act as Data Processors (the updated and complete list of categories of Data Processors is available on the owner's website - [alpitour.it](http://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 of the authorities.

With regard to the possible transfer of data to third countries, the Data Controller informs that the processing will take place according to one of the methods permitted 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, on request, from the Data Controller at the contacts indicated above.

### **Retention of personal data**

Your Personal Data will be kept for the necessary time, and in any case until a possible request for cancellation or the request for revocation of consent. 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 and following of the Regulation)**

You have the right to ask the Data Controller, at any time, to access your data, to correct or delete them or to request the limitation of processing, or to obtain in a structured format, commonly used and readable by an 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 object at any time to sending direct marketing with automated tools (sms, mms, email, push notifications, fax) and not (paper mail, telephone with operator ); furthermore, the possibility of exercising this right in part remains unaffected, that is, in this case, opposing, for example, only the sending of promotional communications made through automated tools.

At any time you can revoke pursuant to art. 7 of the Regulation, the consent already given, without prejudice to the lawfulness of the processing carried out prior to the withdrawal of consent.

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