

Privacy Information pursuant to section 13 of the European Regulation 2016/679 (GDPR)

Dear Guest,

this document give you all the information related to the processing of your personal data at our Hotel, based on principles of lawfulness, fairness and transparency, in order to guarantee your rights and your privacy.

The Data Controller of information you provided, related to your stay, is è Ga.Di.Top Hotels S.R.L – Hotel La Solara, via Capo, 118 - 80067 Sorrento NA, represented by the hotel manager Ugo Di Maio, who can be contacted in the same place. In addition, our hotel uses the Best Western brand (in an "affiliation" relationship) under license from Best Western International, Inc. and this implies that Best Western International, Inc. is also an independent data controller, as per its information.

Giving of data relating to administrative, fiscal and accounting management is compulsory for the following purposes:

- a(1). compliance with law requirements related to notification of people lodged in hotel to the public security authorities;
- a(2). compliance with Police and other Public Authorities requests to which our hotel is obliged to answer by Law;
- a(3). availability of documentation proving the payment of the tourist tax to the Municipality of Sorrento;
- a(4). availability, to credit card companies or other entities that deal with payments made by means other than cash, of documentation proving charges in the event of a dispute or fraud;
- a(5). compliance with the provisions of law and contractual commitments regarding the keeping of accounting documents relating to the provision of our services also through other trustful entities which carry out on our behalf specific tasks of organisational nature. These are, for example, companies/consultants employed for payments operations, cashing and collection of credits, mass elaboration of accounts, accounts auditing, balance sheets auditing.

The processing of your data for the previous purposes is necessary to comply with the legal obligations to which the Data Controller is obliged, as well as for the execution of the hospitality contract, therefore it does not require your consent. The unavailability of such data would prevent us from hosting you.

Personal data collected for the purposes indicated in clauses "a (1)" and "a (2)" are deleted immediately after mandatory communication or otherwise at the time of your departure, unless they are consented to be held for further information purposes defined in clause "d". The data to be retained for the purpose under "a (3)" clause are deleted after five years, as per City Regulations. Data relating to payments made by means other than cash ("a (4)") are kept for a period not exceeding twelve months. Personal data relating to the purpose indicated in the "a (5)" clause are kept for the time required by law.

To provide you with additional services we need your consent to process your personal data for clauses "b" to "e" below, which you are kindly requested to provide at the Reception, without your consent these services cannot be managed:

- b. forwarding of telephone calls, messages, correspondence, parcels, gifts or other communications from which it is possible to find out that you are staying at the hotel;
- c. manage, exclusively as part of your requests, additional internal and external services that involve use and communication of your personal data;
- d. store the data relating to your stay after your departure, in order to send information and/or sales communications, inherent to the hotel at which you decided to stay, and the "Best Western" world: hotels and services linked to this hotel. Your consent, though optional, is required for the completion of the registration with, and the use of, the above-described communications service. You may cancel your registration with the above service at any time, following the procedure indicated in each communication you receive or sending a specific notice to the Company;
- e. collect data for market research and profiling. In this case, your choice and purchasing habits will be analysed to create services, promotions, initiatives and communications that are better suited to your behaviours, habits and needs. Your consent, though optional, is required for the completion of the registration with, and the use of, the above-described communications service. You may cancel your registration with the above service at any time, following the procedure indicated in each communication you receive or sending a specific notice to the Company.

If not spontaneously communicated by the guest when booking or during the stay we do not collect sensitive data, defined as data that allows the disclosure of your health conditions, racial or ethnic origin, religion or political opinions, sexual life or sexual orientation. In this case, our staff will use this data exclusively to provide a service that meets the specific needs for which they were communicated.

Personal data collected for the purposes of clauses "b" and "c" are kept only as long as you stay at the hotel; the data referred to in the "d" clause may be stored for a maximum of seven years or, if there is consent for "e", its retention period will last, unless different company choices, until there is a request for cancellation by the data subject.

About personal data collected for the purpose of clauses "d" and "e", if the service involves transfer to a third country, it can only take place if the appropriate level of protection is established by any of the following: an appropriate decision



of the European Commission, a legally binding and enforceable instrument or corporate rules on data protection, standard data protection clauses, an approved code of conduct, an approved certification mechanism, or other measures.

We conclude by informing you that you have the right to obtain access to your personal data, to obtain rectification, erasure, portability, restriction or to object to its processing, as defined in sections 15 to 22 of GDPR, and to lodge a complaint with a supervisory authority.

Thank you for your kind cooperation, we wish you a pleasant stay.

Consent to the processing of personal data

Afte	er reading the notice above, you consent to:
b.	the forwarding of telephone calls, messages, correspondence, parcels, gifts or other communications from which it is possible to find out that you are staying at the Hotel; \Box YES \Box NO
c.	manage, exclusively as part of your requests, additional internal and external services that involve use and communication of your personal data; □ YES □ NO
d.	receive information and/or sales communications, inherent to the hotel in which you stayed and in general inherent to the "Best Western" world; □ YES □ NO
e.	receive information and/or sales communications, better suited to your needs, based on data processing for profiling; $ \ \ \square \ \text{YES} \qquad \square \ \text{NO}$
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