

Data protection policy

Information on the protection of personal data Article 13 EU Regulation 2016/679

Pursuant to art. 13 of **EU Regulation 2016/679** “Code concerning the protection of personal data” (hereafter, the “Code”) **IBH RIPA S.r.l.** with its registered offices and place of business based in Hotel RIPA, via Luigi Gianniti, 21 – 00153 Rome, as to their respective powers, the “Holders” of data processing, provide some information about the use of personal data performed in the www.hotelriparoma.com domain or our APP.

For the purposes of this mandatory information, the terms below shall have the following meanings:

- 1) **«personal data»:** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 2) **«processing»:** any operation or complex of operations performed, including without the aid of electronic instruments, concerning the collection, recording, organization, structuring, storage, adaptation or amendment, extraction, consultation, use, communication through transmission, dissemination, or other forms of provision, comparison or interconnection, limitation, deletion and destruction of personal data or sets of personal data.
- 3) **«restriction of processing»:** means the marking of stored personal data with the aim of limiting their processing in the future;
- 4) **«controller»:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 5) **«manager»:** the natural or legal person, public authority, the service, or any other entity, association or body appointed to process the personal data by the owner of the personal data;
- 6) **«recipient»:** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 7) **«consent»:** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her; [...]
- 8) **«personal data breach»:** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 9) **«appointee»:** the natural person authorised to carry out processing operations by the owner or manager;
- 10) **«domain»:** the domain which can be reached via the world wide web service of the Internet, comprising data, applications, for the transmission and potential collection of information.

I. NATURE OF THE PROCESSED DATA

The following personal data may be subject to processing: Name, Family Name, Telephone numbers, Age, Gender, Email address, Postal address, Credit and debit card number used for the reservations for which, where provided for in the Regulation, consent for processing will be required.

II. PURPOSE OF THE PROCESSING

The personal data may be processed, only for as long as necessary in order to:

- 1) managing the relationship with IBH RIPA S.r.l: in particular, for the design and provision of hospitality and hosting services;
- 2) purposes strictly associated with and instrumental to managing the aforesaid relationship (for example for acquiring pre-contractual information and for executing the services and operations, as contractually agreed);
- 3) purposes of analysing information obtained for the offer, for profiling, by sending promotional information (the information could be provided in an electronic form with our APP) about goods and services considered to meet your interest (always with your specific consent);
- 4) purposes relating to monitoring the progress of customer relations and the services as contractually agreed;

- 5) purposes relating to associated with legal obligations and instructions to the Authorities or the Vigilance bodies;
- 6) To comply with legal obligations.

III. METHODS

In relation to the purposes indicated the data you have provided by digital means, by completing the forms provided at the collection points on our web domain/APP, will be subject to computer and paper processing and processed by suitable computer procedures in order to personalize the services that IBH RIPA S.r.l is able to offer you.

The data will be processed in order to guarantee its virtual and physical security and confidentiality, and may be carried out via manual, computer and virtual instruments in order to memorize, send and share the data with our representatives.

The processing logic will be strictly linked to the purposes illustrated, specifically your data, which can be subjected to all the processing envisaged by the Code, will be saved and/or processed using suitable computer procedures, and taken:

- by the company departments responsible for managing the activities referred to above, or enabled to carry out those necessary for maintaining and/or executing and/or concluding the relationship established with you;

- by natural or legal persons who, in force of agreement with IBH RIPA S.r.l, supply specific processing services or carry out associated, instrumental activities or in support of those of IBH RIPA S.r.l.

The sending of unsolicited commercial communications must be specifically authorized by the data subject.

IV. COMMUNICATION OF DATA

Your data will or may be communicated - upon expression of your consent in the legal way - to 3rd parties, such as:

- 1) Banks appointed for settlement of payments according to the agreed methods;
- 2) Insurance companies for the definition of potential cases of damages compensation;
- 3) Entities or bodies authorised to fulfil the associated obligations within the limits of the provisions of law;
- 4) Companies forming part of IBH RIPA S.r.l. suppliers, for improving the quality of services that IBH RIPA S.r.l. is able to offer you;
5. - Natural or legal persons who, by being under contract with IBH RIPA S.r.l., supply specific processing services or carry out associated, instrumental activities or in support of those of IBH RIPA S.r.l.

Our website does not contain hypertext connections which form communication with other domains. IBH RIPA S.r.l., is not responsible for any violations of privacy by such sites that might have fraudulently cloned our website.

V. MANDATORY OR OPTIONAL NATURE OF THE DATA PROVISION

The provision of the data provision is not mandatory, but is essential for correctly fulfilling the pre-contractual or contractual obligations, and in general for fulfilling all legal requirements. Any refusal to provide your personal data, or to consent to its processing or communication to the entities referred to the categories referred to above, implies difficulty in fulfilling any contractual relationship between you and our company, and benefiting from the services associated with it.

VI. RIGHTS OF THE INTERESTED PERSON.

Lastly we inform you that article of the Code - whose text is annexed in its entirety - grant interested parties specific rights. In particular you can obtain from IBH RIPA S.r.l.. confirmation of the existence or otherwise of your personal data, and its availability in an intelligible form. You can also request to learn the origin of the data, and the logic and purposes on which its processing is based; you can obtain adjustment or deletion of data processed as described under point VIII below.

VII. DATA CONTROLLER

The controller of the processing of your personal data is **IBH RIPA S.r.l.** with its registered offices and place of business based in Hotel RIPA, via Luigi Gianniti, 21 – 00153 Rome.

A list of all the outside Companies responsible for specific data processing will be kept updated and will be sent to customers on request. The list will also be available at the appropriate offices of the Company.

VIII. DATA PROCESSING ADJUSTMENTS

You may at any time revoke consent to the processing of your personal data by activating the Cancellation or Revoking Consent procedure. Cancellation or opposition may in some cases imply the termination of the existing contract.

If you wish to modify the processing of your data, you can send an e-mail to privacy@hotelriparoma.com or a fax to n. 065814550 together with a photocopy your ID, which will be immediately destroyed, with the following text: "deletion/restriction/correction/opposition to the consent of all my personal Data Processing (or specify which ones)", you can otherwise send a registered letter (return receipt), with the same content to the following address: via Luigi Gianni, 21 – 00153 Roma.

IX. SUPERVISOR

The updated list of the Parties responsible for specific processing is available at the appropriate offices of the Company.

X. CONTACTS

If you have questions or would like more information on the processing of your personal data or report a bug or lodge a complaint, you may send an email to the following address: privacy@hotelriparoma.com. You may contact us at the same address or by telephone (n. 06.58611) for questions regarding management of information by **IBH RIPA S.r.l.**. Before **IBH RIPA S.r.l.** can give you any information, it will be necessary to verify your identity and answer a few questions. We will respond as soon as possible.

The company has appointed Dr. Eng. Luca Lestingi as a DPO (Data Protection Officer). Any claim of infringement of the rights of the interested person can be directed to info@progettosavi.eu.

Rome, 21.05.2018

Reg.679/2016/EU

Article 4 - Definitions

1) 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

2) 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; [...]

1) 'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her; [...]

Article 6 - Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. [...]

Article 13 - Information to be provided where personal data are collected from the data subject

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:

- (a) the identity and the contact details of the controller and, where applicable, of the controller's representative;
- (b) the contact details of the data protection officer, where applicable;

- (c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - (d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
 - (e) the recipients or categories of recipients of the personal data, if any;
 - (f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:
- (a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - (b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
 - (c) where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - (d) the right to lodge a complaint with a supervisory authority;
 - (e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
 - (f) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
3. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.
4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information.

Article 15 - Right of access by the data subject

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
- (a) the purposes of the processing;
 - (b) the categories of personal data concerned;
 - (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - (f) the right to lodge a complaint with a supervisory authority;
 - (g) where the personal data are not collected from the data subject, any available information as to their source;
 - (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Article 16 - Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Article 17 - Right to erasure ('right to be forgotten')

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
- (a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
 - (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
 - (d) the personal data have been unlawfully processed;
 - (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
 - (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).

2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- (d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- (e) for the establishment, exercise or defence of legal claims.

Article 18 - Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- (a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- (b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- (c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- (d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.

2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Article 19 - Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

Article 21 - Right to object

1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

[For the full text of EU Regulation 2016/679 see the Data Protection Supervisory Authority website.](#)