

Information on the processing of personal data pursuant to art. 13-14 EU Reg. 2016/679

Interested Subjects: Guests - Hotel della Baia, Thermal Park.

Immobiliare Cinarime srl, in its capacity as Data Controller of your personal data, pursuant to and for the purposes of the EU Reg. 2016/679 hereinafter referred to as 'GDPR' of the new Italian Privacy Code Legislative Decree 196/2003 as coordinated by Legislative Decree 196/2003. Lgs 101/2018 and subsequent amendments, hereby informs you that the aforementioned legislation provides for the protection of data subjects with respect to the processing of personal data and that this treatment will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned law and the confidentiality obligations set forth therein.

Personal information we collect for pre-filled check-in:

- name and surname;
- place and date of birth;
- citizenship;
- type, number, place of issue of the identification document.

Other personal information we collect to manage the booking of Hotel della Baia and Parco Termale hotel services:

- email address;
- phone number;
- residential address;
- credit card details;
- bank references of the interested party.

Purpose and legal basis of the processing: in particular, your data will be processed for the following purposes related to the implementation of obligations relating to legislative or contractual obligations:

- obligations required by law in the tax and accounting field;
- booking and pre / post-sales assistance;
- litigation management;
- customer billing history.

Your data will also be processed for the following purposes related to the implementation of obligations relating to legislative obligations:

- obligations under the laws in force.

Your data will also be used for the following purposes relating to the execution of measures related to contractual or pre-contractual obligations:

- customer management;
- pre-filled check-in management;
- booking hotel services - Hotel della Baia;
- services related to the Negombo beach.

Your data will also be used for the following purposes necessary for the pursuit of the legitimate interest of the owner:

- planning of the activities of the beach in safety.

- implementation of the anti-diffusion security protocol SARS-COV-2(Annex sub 1 - Ordinance n.51 of 24/5/2020 ex Dec. N.51 PGRC of 20/03/2020)

For the purposes of the indicated processing, the Data Controller may become aware of particular categories of personal data and in detail: state of health. The processing of personal data for these particular categories is carried out in compliance with Article 9 of the GDPR.

Data collection takes place from the interested party and the provision of data is optional for you with regard to the aforementioned purposes, and any refusal to process the data does not compromise the continuation of the relationship or the adequacy of the treatment itself.

Methods of processing. Your personal data may be processed in the following ways:

- processing by means of electronic computers;
- manual processing by means of paper archives.

Each treatment takes place in compliance with the procedures set out in Articles. 6, 32 of the GDPR and by adopting the appropriate security measures provided.

Your data will be processed only by personnel expressly authorized by the Data Controller and, in particular, by the following categories of employees:

- The data processed could be processed by the Back / Front Office Hotel, Managment Lido;
- Subjects appointed as data processors pursuant to article 29 of the GDPR;
- Administration office;

Communication: Your data may be disclosed to external parties for proper management of the relationship and in particular to the following categories of Recipients including all duly appointed Data Processors:

- banks and credit institutions;
- Provisions of the Ministry of the Interior concerning the communication to the public security authorities of the arrival of people housed in accommodation facilities. Legislative Decree 7 January 2013;
- consultants and freelancers, also in associated form;
- in the context of public and / or private entities for which the communication of data is mandatory or necessary in compliance with legal obligations or is in any case functional to the administration of the relationship;
- police force;
- insurance companies;
- companies for Logistics.

Diffusion. The data will not be disclosed.

Retention period. We point out that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the retention period of your personal data is:

- the contact details for the services of the Negombo Thermal Park will be kept for 14 days as prescribed by the protocol antispreading security SARS-COV-2 (Annex sub 1 - Ordinance n.51 of 24/5/2020 ex Decree N.51 PGRC of 20/03/2020);
- the contact details of the e-mail and telephone number will be kept for a maximum period of 2 years from collection. The retention time is established on the basis of a logic of statistical times for the return of the regular customer;
- the credit card data will be kept for a maximum period of 3 months from the customer's departure;
- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed for the execution and fulfillment of the contractual purposes;
- established for a period of time not exceeding the completion of the services provided;
- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed and in compliance with the mandatory time limits prescribed by law.

Owner: the Data Controller, pursuant to the Law, is Immobiliare Cinarime srl (Via Medina 63, 80133 Naples (NA); E-mail: hoteldellabaia@negombo.it ; Telephone: 081 995453; VAT number:01869250637) in the person of its pro tempore legal representative.

The data protection officer (DPO) designated by the owner pursuant to Article 37 of the GDPR is:

- Gino Peraro (E-mail: ginoperaro@privacy-gdpr.eu ; CF: PRRGNI63P26E329E).

You have the right to obtain cancellation (right to be forgotten), limitation, updating, rectification, portability, opposition to the processing of personal data concerning you from the person in charge, as well as in general can exercise all the rights provided by articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

EU Reg. 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the interested party

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet recorded, their communication in an intelligible form and the possibility of making a complaint to the Supervisory Authority.
2. The interested party has the right to obtain the indication:
 - a. to the origin of the personal data;
 - b. the purposes and methods of the processing;
 - c. of the logic applied in case of treatment carried out with the aid of electronic instruments;
 - d. the identification details of the owner, of the managers and of the designated representative pursuant to article 5, paragraph 2;
 - e. of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents.
3. The interested party has the right to obtain:
 - a. updating, rectification or, when interested, integration of data;
 - b. the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed;
 - c. the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
 - d. data portability.
4. The interested party has the right to object, in whole or in part:
 - a. for legitimate reasons to the processing of personal data concerning him, even if pertinent to the purpose of the collection;
 - b. to the processing of personal data concerning him for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.