

**CUSTOMER PRIVACY POLICY**compliant with Articles 13-14 of the 2016/679 European Regulation  
(GDPR)

(Customers)

Document updated to 16/05/2023

**INFORMAZIONI GENERALI**

We wish to inform you that the European Regulation 2016/679 (hereinafter GDPR) lays down rules relating to the protection of natural persons with regards to the processing of personal data and rules relating to the free movement of personal data. The GDPR protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data. The free movement of personal data within the Union shall be neither restricted nor prohibited for reasons connected with the protection of natural persons regarding the processing of personal data.

We therefore point out that "personal data" means, pursuant to the GDPR, any information that concerns you directly or indirectly as the interested party, 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.

**1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER**

The controller is **DOTCAMPUS ROMA S.R.L.**, with registered office in **Via Leonida Bissolati 20, Rome**. The contact details are those indicated in the header. The controller does not perform activities that require the mandatory designation of the Data Protection Officer.

**2. AIMS AND PURPOSES OF THE DATA PROCESSING**

The collection and the processing of personal data will take place - in compliance with the general principles of necessity, correctness, relevance and non-excess – in order to provide a correct and complete service and in particular:

- A. for necessary and indispensable processing which may be operational, managerial, accounting and of other nature (including payment data such as credit and debit card numbers or other) and which is in relation to the services requested;
- B. for the registrations and communications required by law including those related to the identification and reporting obligations provided for by the T.U.L.P.S. (including the online check-in service performed directly by the user), as well as for the health and safety of guests;
- C. subject to your express consent:
  - take advantage of additional services made available by the Data Controller for which your consent is required (including, without limitations, forwarding of incoming phone calls to the room, messages, correspondence, communication of your presence during visits by external parties etc.);
  - for the publication on our website and/or on other communication tools (social networks, etc.) of images, photographs, videos, acquired by this organization or by appointed third parties, in relation to the playful or recreational activities carried out at our facility. The publication has promotional purposes and is related to the activity of this accommodation facility;
  - for commercial/promotional purposes, the possibility of sending advertising material or for carrying out market research on the services provided (including, without limitations, updates on initiatives, offers and promotions related to services and products referable to the activity of the Data Controller and of third parties with whom it collaborates, programs and promotions, including online, aimed at rewarding or retaining potential customers) both through traditional contact methods (paper mail or calls through an operator) and through automated methods (email, text messages, multimedia messaging service, other messaging applications);
  - measurement of customer satisfaction with regard to the services provided and any other kind of request, by telephone interviews or by e-mails or text messages.

We specify that the provision of mandatory data is strictly necessary for the correct and complete execution of the contract; any refusal to supply them, in whole or in part, will make impossible the contract execution and/or the provision of the requested services.

**3. CATEGORIES OF PERSONAL DATA**

The personal data processed by Data Controller are identification, contact and tax data. Only and exclusively if necessary and functional to the correct fulfillment of the purposes indicated in point 2, the Data Controller may process personal data classified as particular (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data relating to health or sex life or sexual orientation of the person) and personal data of family members and other subjects (including data of minors).

**4. LAWFULNESS OF PROCESSING – LEGAL BASIS**

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

- by Article 6 paragraph 1 letters a) b), c), f) of the GDPR
  - a) the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes; (C42, C43)
  - 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;
  - f) processing is necessary for the purposes of the legitimate interests pursued by the controller (such as, for example, the prevention of fraud or abuse against our website: it can be considered legitimate interest to process personal data for direct marketing purposes as highlighted in the recital 47 of the GDPR) 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.
- by Article 9 paragraph 2 letters a) e), f) of the GDPR
  - a) the Data Subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the Data Subject;
  - e) processing relates to personal data which are manifestly made public by the Data Subject;
  - f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

**5. RECIPIENTS OF THE PERSONAL DATA**

The communication to the identified recipients, only if involved and functional, is linked to the achievement of the purposes listed in point 3, therefore the personal data collected and processed may be:

- a) used anonymously for statistical purposes;
- b) made available to the Data Controller's employees or collaborators as Data Processors or as persons who are authorised to process personal data;
- c) disclosed to natural or legal third parties, public administrations, professionals, law enforcement agencies, government bodies, regulatory bodies, courts or other public authorities authorized by law;
- d) if necessary, transferred to another Data Controller in accordance with the provisions of the GDPR, also with regard to the right to data portability.

The list of personal Data Processors is available at the headquarters of the Data Controller.

**6. DATA STORAGE**

The data provided for the aforementioned purposes will be:

- for mandatory data: kept for the period envisaged by fiscal and civil law;
- for commercial/promotional purposes: until the consent is revoked or the right to object is exercised and, in any case, no later than fifteen years from collection.

The data will not be disseminated without the prior authorization of the Data Subject, they will not be transferred to a third country and will be destroyed when we no longer need or are obliged to keep them.

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**7. METHODS OF PROCESSING**

The personal Data Subject to the processing will be processed:

- manually and/or electronically and will be stored in specific paper and/or electronic filing system. Paper and electronic documentation will be correctly maintained and protected for as long as necessary for processing using appropriate security measures, in order to minimize the risk of destruction or loss, of unauthorized access or processing not compliant with the purposes of collection;
- there is no automated decision-making process and no profiling is performed.

**8. RIGHTS OF THE DATA SUBJECT**

We inform you that, as Data Subject, you have all the rights provided for by Articles 15-16-17-18-20-21-22 of the GDPR, including:

- 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 organisations; 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 the including the profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the Data Subject.
- the existence of the right to data portability, including all the information available on the personal data origination; furthermore, the Data Subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay under Article 17 («right to be forgotten»).
- if the treatment is based on Article 6, paragraph 1, letter a), or on Article 9, paragraph 2, letter a), the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- the right to lodge a complaint with the supervisory authority;
- to be provided with a copy of the personal data undergoing processing, as long as the right of obtaining a copy does not adversely affect the rights and freedoms of others. 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;

The above information will be provided:

- within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
- if the personal data are to be used for communication with the Data Subject, at the latest at the time of the first communication to that Data Subject; or if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

All the rights of the Data Subject provided for by the GDPR are exercised with a request addressed without formalities to the Data Controller, also through a person in charge, to which a suitable reply is provided without delay.

**CONSENT TO THE PROCESSING OF PERSONAL DATA**

SURNAME NAME						POSTAL CODE		
ADDRESS				CITY				
TAX CODE							PHONE	
E-MAIL						MOBILE		
OTHER INFORMATION								

By signing at the bottom of this policy as the Data Subject, I manifest the free, specific, informed and unequivocal intention to accept the processing of my personal data for the aims and purposes indicated in this policy and within the limits in which my consent was required for the purposes of the law, as well as the communication of my personal data to the subjects indicated in the policy.

<input type="checkbox"/> AUTHORIZE <input type="checkbox"/> DO NOT AUTHORIZE	Aware that it is neither mandatory nor binding, by ticking the box alongside I express my consent also for the conservation of the identification details for any recurring use
<input type="checkbox"/> AUTHORIZE <input type="checkbox"/> DO NOT AUTHORIZE	Aware that it is neither mandatory nor binding, by ticking the box alongside I express my consent also for the sending of communications or informative and commercial material, also by fax, text messages and e-mail
<input type="checkbox"/> AUTHORIZE <input type="checkbox"/> DO NOT AUTHORIZE	Aware that it is neither mandatory nor binding, by ticking the box alongside I express my consent also for forwarding incoming phone calls to my room, messages, correspondence and for communicating visits by external parties
<input type="checkbox"/> AUTHORIZE <input type="checkbox"/> DO NOT AUTHORIZE	Aware that it is neither mandatory nor binding, by ticking the box alongside I express my consent also for the publication on the website of the Data Controller and/or on other communication tools (social networks, etc.) of images, photographs, videos, acquired by this organization or by appointed third parties, in relation to the playful or recreational activities carried out at our facility, for promotional purposes relating to the activity of this accommodation facility
I also extend the consent to members of my family unit: <input type="checkbox"/> YES <input type="checkbox"/> NO	

Rome (RM)

Signature for acknowledgment / consent