

Information about privacy

In accordance with article 13 of Italian Legislative decree no.196 dated 30 June 2003

PURPOSE AND METHOD OF DATA PROCESSING

The data which has been provided will be processed and stored safely and confidentially as guaranteed by the Italian Legislative decree no. 196 of 30 June 2003, and will be used solely and exclusively in order to carry out services requested from ATAHOTELS s.p.a. The data may be handled on computer or automatically. The data, which has been communicated, will not in any case be alienated or distributed in any form to third parties, except where previous consent has been obtained from the subject concerned.

TYPE OF DATA SUBMISSION

The choice of whether to submit information is optional. This data is however necessary in order to furnish estimates of expenditure for services, which have been requested, and for any communications regarding special offers. Without this information therefore it is impossible to furnish services to the client. At the time the form is submitted, the client will give his consent to processing and storage of his data according to the conditions explained in the preceding paragraph.

TYPE OF DATA ACQUIRED AND PROCESSED

1) Data provided voluntarily by the user at the time of sending information or for access to reserved areas in order to obtain services or receive communications.

In order to access some specific areas of the site or services, the user may be requested, explicitly, voluntary and by optional submission to furnish data in alphanumeric characters, which through processing or association with other data, can identify the user.

The explicitly voluntary and optional submission of e-mail or other communication to the addresses indicated on the site will lead to acquisition of personal data contained in the message as well as the sender's address, necessary for providing a reply or for furnishing services.

The user is requested in any case not to furnish confidential information as described in article 4, letter d) of the legislative decree no. 196/03, regarding himself or others, in particular regarding health matters, without the previous consent for processing and storage according to the above law.

2) Navigation data

Information technology systems and software procedures necessary for proper functioning of this site acquire some types of data of a personal nature during the course of normal functioning. This is implicit in the use of web protocols and transmission or it is useful for better management and optimisation of the site. (e.g. IP address, URL addresses, names and dominions, time of requests, size of files, and other parameters relating to the operating system of the user). The purpose of this data collection is either exclusively statistical in nature or for monitoring the correct working of the site. It does not have a commercial purpose nor is it in any way intended to identify the user and is carried out using server technology, managed and administered by the data controller.

RIGHTS OF THE USER

The user may at any time exercise his rights according to article 7 of Italian Legislative decree no.196 dated 30 June 2003, including the right to modify, integrate, update, confirm or erase the stored data. These rights may be exercised in the following way:

-By sending an e-mail to the address commerciale@atahotels.it

-By sending a registered letter with return receipt to ATAHOTELS s.p.a. - Via Fabio Filzi 25 - 20124 MILANO

DATA CONTROLLER AND PLACE OF DATA STORAGE

The data controller is the director of the data centre and the address is the location of the data centre itself.

All material comprising this site, electronic communications before their receipt and navigation data are stored on the server of Fastweb.it

According to article 13 of Italian Legislative decree no.196 dated 30 June 2003 (background information)

1. The user or the person who furnishes data must be informed in advance, orally or in writing regarding:

- a) the purpose of data collection and method of data processing and storage;
- b) whether data communication is optional or compulsory;
- c) the consequences of a refusal to reply;
- d) the persons or groups of persons to whom this personal data may be communicated or who may receive this information due to their position or job, as well as the situations in which the data will be transmitted;
- e) the rights of the user as laid out in article 7;
- f) the personal identifying details of the controller or, if designated, of the assistant in charge within the State territory according to article 5 of the law and the person in charge. When the controller has designated more than one assistant, at least one of them will be named, in conjunction with the site address of the communication network. A simple way in which it is possible to access the updated list of these persons will also be indicated. When a person has been designated as responsible for enquiries to a user in case he wishes to exercise his rights according to article 7, this person's name will be indicated.

2. The background information given in paragraph 1 above contains information specifically requested by this code of conduct. It does not include information that is already known to users or information which if known can in effect prevent inspections or checks by a public figure for purposes of defence or security of the State or for prevention, verification or repression of crime.

3. The Guarantor may in future legislate methods to simplify background information, in particular from telephone assistance and public information services.

4. If the data has not been acquired directly from the person involved, the privacy regulations in paragraph 1 including all categories of data processed will be communicated to the subject at the time of data registration or when any other type of communication is used, at the time of the first communication and no later.

5. The rules applied in paragraph 4 do not apply when:

- a) The data is processed to satisfy a legal obligation, a regulation or a community rule.
- b) The data is processed solely with the aim of carrying out defensive investigations according to law no. 397 of 7 December 2000, or in any case, to ensure or defend rights in a legal situation, providing in this case also that the data is used exclusively for that purpose and for the period of time strictly limited to that necessary to carry it out.
- c) The information regarding privacy utilises means which the Guarantor, prescribing appropriate measures if necessary, deems manifestly disproportionate with respect to the right which is being protected, or, in the judgement of the Guarantor, is impossible.

Article. 7 of the Legislative decree n. 196 of 30 June 2003, (Right of access to personal data and other rights)

1. The user has the right to obtain confirmation of the existence of personal data that regard him even if they have not yet been recorded, with communication in an understandable form.

2. The user has the right to know the following:

- a) the source of the personal data;
- b) the purposes for and method of data processing and storage;
- c) the logic applied when data is processed with the aid of electronic instruments;
- d) the identifying details of the owner, the director and his assistants in accordance with article 5, comma 2;
- e) the persons and groups of persons to whom the personal data can be communicated or who may come to know due to their position as designated representative, responsible or in charge, in the territory of the Country.

3. The user has the right to request the following:

- a) revision, rectification or when he desires, completion of data;
- b) cancellation, transformation into an anonymous form or blocking of data which was processed in violation of the law, including that which was not necessary to store for the purposes for which the

data was collected or later processed;

c) proof that the operations a) and b) above were brought to the notice of those responsible for action, as well as to those to whom the data was communicated or given, except in the case where this is impossible or requires the use of manifestly disproportionate means with respect to the rights being safeguarded.

4. The user has the right to withhold consent, wholly or in part:

a) for the processing and storage of data that regard him even though they may be pertinent to the purpose of data collection, for legitimate reasons;

b) for the processing and storage of personal data with the purpose of sending advertising material or for direct sales, market research or commercial information.

[Italian laws on personal data protection \(D. Lgs. 196/03\)](#) (external link)