
Information notice pursuant to Article 13 of Regulation 2016/679 (EU)

VOIhotels S.p.A

Data controllers and purposes of the processing

With regards to the processing of your personal data (Article 4.1 of the Regulation) provided, we inform you that they will be processed by:

1. **VOIhotels S.p.A.**, with registered office in Torino, Via Lugaro, 15 - 10126, as Data Controller (hereinafter "**Data Controller**"). **VOIhotels S.p.A. is part of Alpitour Group.**

Data Controller will process your personal data for the following purposes:

- a) **Management of your stay at our hotel**

The legal basis of the processing is identified in 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 (article 6.1.b) of the Regulation).

Your Personal Data will be processed by way of manual and electronic methods; subject to the processing may also be special categories of personal data (pursuant to Article 9 of the Regulation - for example, a customer with disabilities), in which case the legal basis of their processing will be your **explicit consent** to the processing of such data for the purposes specified above, pursuant to art. 9.2.a) of the Regulation.

We also inform you that the data collected and provided by you may also be referred to your family members.

- b) **Compliance with regulatory obligations** (particularly, the communication of your data to the public security authority), **tax and accounting obligations**

The legal basis of the processing is the compliance with a legal obligation to which the controller is subject (article 6.1.c) of the Regulation).

The provision of your personal data for the purposes referred to in letters a) and b) is mandatory for the execution of the contract and the compliance to legal obligations.

- c) **To communicate data relating to your stay to third parties for the sole purpose of allowing the receipt of messages and phone calls addressed to you**

The legal basis of the processing is the consent by the data subject to the processing of his personal data (article 6.1.a) of the Regulation).

The provision of your personal data for the purposes referred to in letter c) is optional; there is no consequence for your refusal to provide it.

For processing carried out for the purposes of **direct sending of advertising material or direct selling or for carrying out market research or commercial communications in relation to products or services of the Controller that are similar to those purchased**, the latter may use, without the consent of the data subject, e-mail and postal addresses in accordance with and within the limits permitted by the regulations in force and by the Decision of the Italian Data Protection Authority dated 19 June 2008.

The legal basis for the processing of your data for this purpose is Article 6.1.f) of the Regulation. The data subject may object to such processing at any time, whether initially or through subsequent communications, easily and free of charge, by emailing: privacy.voi@alpitourworld.it;

In case you wish to oppose to such processing or revoke the consent given, you will be able to do so, at any time, by writing to the Controller at the indicated addresses without prejudice to the lawfulness of the processing carried out prior to the withdrawal of such consent.

The provision of your Personal Data for the purpose above is optional; there is no consequence for your refusal to provide it.

Recipients and transfer of personal data

Your Personal Data may be shared with:

- natural persons authorized by the Data Controller to process Personal Data;
- Alpitour S.p.A. as parent company of Alpitour Group of which Data Controller is part
- third parties for the performance of economic activities, some of which act as Data Processors (the complete and updated list of data processor is available on the website www.voihotels.com);
- persons, bodies or authorities to whom/which it is mandatory to communicate your Personal Data pursuant to legal provisions or orders from the authorities.

With regard to any transfer of personal data to third countries, the Data Controller informs that the processing will take place according to one of the means permitted by the applicable law, such as the consent of the data subject, the execution of a contract concluded between the data subject and the data controller, or the execution of pre-contractual measures taken at the request of the data subject; the conclusion or execution of a contract concluded between the data controller and another natural or legal person in the interest of the data subject; the adoption of Standard Contractual Clauses approved by the European Commission, appropriate safeguards (e.g. EU-US Privacy Shield), adequacy decisions. Further information is available upon request to the Data Controller.

Storage of personal data

Your Personal Data will be stored for the time necessary to perform the services provided for in the contract, so as to comply with the principle of data minimization and data storage under Article 5 of the Regulation, without prejudice to the further storage required by the applicable legislation, including, for example, the obligations arising from the application of Article 2946 of the Civil Code. Further information is available by requesting it to the Data Controller.

Your privacy rights pursuant to Articles 15 et seq. of the Regulation

You have the right to ask the Data Controller, at any time, to access your Personal Data, correct or delete them, or request the limitation of processing, or obtain in a structured, commonly used and machine-readable format, the data concerning you in the cases provided for by Article 20 of the Regulation.

At any time, under Article 7 of the Regulation, you may revoke the consent already provided, without prejudice to the lawfulness of the processing carried out prior to the withdrawal of such consent.

Requests must be sent in writing to the Data Controller at the following address: privacy.voi@alpitourworld.it; or to the Data Protection Officer at the address: dpo@voihotels.com.

In any case, you are always entitled to lodge a complaint with the competent supervisory authority, pursuant to Article 77 of the Regulation, if you believe that your personal data have been unlawfully processed.

2. **Alpitour S.p.A.**, with registered office in Torino, Via Lugaro 15 - 10126, that will process your Personal Data, not including special categories of personal data and with your consent, as Data Controller. **Alpitour S.p.A. is parent company of Alpitour Group of which VOIhotels S.p.A. is part.**

Data Controller will process your personal data for the following purposes:

- a) **sending promotional and marketing communications, including the sending of newsletters and market research**, through automated means (SMS, MMS, email, push notifications) and non-automated means (paper mail, telephone with operator); the Data Controller collects a single consent for the marketing purposes described herein, in accordance with the Decision issued on 4 July 2013 by the Italian Data Protection Authority "Guidelines on promotional activities and the fight against spam"; in any case, you may oppose to the processing of your personal data for marketing purposes performed with the means indicated herein, as well as revoke the consent given, at any time by contacting the Data Controller at the address indicated in this notice, without prejudice to the lawfulness of the processing based on consent given prior to its revocation

The legal basis for processing Personal Data for the above-mentioned purpose is the data subject's consent (Article 6.1.a) of the Regulation).

The data subject may revoke the consent given and oppose to such processing at any time in an easy and free manner, by writing to the Servizio Privacy of the Data Controller at: privacy@alpitourworld.it.

The provision of your Personal Data for the purposes referred to in letter a) is optional; there is no consequence for your refusal to provide it.

- b) **profiling or market research, performed also by means of automated tools, aimed at analyzing data subject's personal preferences and interests, so as to personalize messages addressed to the customers**

The legal basis for processing your data for the above-mentioned purpose is the data subject's consent (Article 6.1.a) of the Regulation).

The Data Subject may revoke the consent given and oppose to such processing at any time in an easy and free manner, by writing to the Servizio Privacy of the Data Controller at: privacy@alpitourworld.it.

The provision of your Personal Data for the purposes referred to in letter a) is optional; there is no consequence for your refusal to provide it.

Recipients and transfer of personal data

Your Personal Data may be shared with:

- natural persons authorized by the Data Controller to process Personal Data;
- third parties for the performance of economic activities, some of which act as Data Processors (the complete and updated list of data processor is available upon request to the Data Controller);
- persons, bodies or authorities to whom/which it is mandatory to communicate your Personal Data pursuant to legal provisions or orders from the authorities.

With regard to any transfer of personal data to third countries, the Data Controller informs that the processing will take place according to one of the means permitted by the applicable law, such as the consent of the data subject, the execution of a contract concluded between the data subject and the data controller, or the execution of pre-contractual measures taken at the request of the data subject; the conclusion or execution of a contract concluded between the data controller and another natural or legal person in the interest of the data subject; the adoption of Standard Contractual Clauses approved by the European Commission, appropriate safeguards (e.g. EU-US Privacy Shield), adequacy decisions. Further information is available upon request to the Data Controller.

Storage of personal data

Your Personal Data will be stored for the time necessary to perform the services provided for in the contract, so as to comply with the principle of data minimization and data storage under Article 5 of the Regulation. Further information is available by requesting it to the Data Controller.

Your privacy rights pursuant to Articles 15 et seq. of the Regulation

You have the right to ask the Data Controller, at any time, to access your Personal Data, correct or delete them, or request the limitation of processing, or obtain in a structured, commonly used and machine-readable format, the data concerning you in the cases provided for by Article 20 of the Regulation.

We also inform you that you have the right, under Article 21 of the Regulation, to oppose, for legitimate reasons, to the processing of your data, for example, by opposing at any time to direct marketing performed with automated means (SMS, MMS, email, push notifications) and traditional means (paper mail, phone calls); furthermore, you have the possibility of exercising this right only in part, that is, by opposing, for example, to the sending of promotional communications performed only via automated means.

At any time, under Article 7 of the Regulation, you may revoke the consent already provided, without prejudice to the lawfulness of the processing carried out prior to the withdrawal of such consent.

Requests must be sent in writing to the Servizio Privacy of the Data Controller at: privacy@alpitourworld.it or to the Data Protection Officer at the address: DPO@alpitourworld.it.

In any case, you are always entitled to lodge a complaint with the competent supervisory authority, pursuant to Article 77 of the Regulation, if you believe that your personal data have been unlawfully processed.