

PRIVACY NOTICE PURSUANT TO ART. 13 OF EU REGULATION 2016/679

Dear Customer,

Pursuant to Article 13 of EU Regulation 2016/679 (General Data Protection Regulation – GDPR), Roscioli & Pallavicini S.r.l. informs you that your personal data, collected in connection with the contractual relationships established, will be processed in compliance with the aforementioned regulation. Regarding said processing, we provide the following information:

Types of Personal Data Processed

The personal data collected from you and/or freely provided by you relates exclusively to: identification data (e.g., name, surname, address, phone number, fax, email, etc.); tax data (if legally required, e.g., tax code, VAT number, etc.); images captured by the video surveillance system.

Subject to your explicit consent, the processing of the above data may also include health-related data (e.g., physical disabilities requiring specific room arrangements, food allergies, etc.). In such cases, processing will be limited to the data and operations strictly necessary to fulfill pre-contractual and contractual obligations relating to the provision of hotel services, in accordance with the services requested during booking or your stay at our facility.

Data Controller and Data Protection Officer (DPO)

Independent data controllers:

Roscioli & Pallavicini S.r.l., with registered office at Via M. D’Azeglio, 21 – 00184 Rome.
Contact: rosciolipallavicini@legalmail.it, Tel: +39 06.476811.

Best Western International Inc., as per separate privacy policy.

Data Protection Officer (DPO): Mr. Fabrizio Roscioli, contactable at dpo@lvrh.it.

Purpose of Data Processing

The purposes of processing your personal data are as follows:

- to acquire and confirm your accommodation and ancillary service bookings and to provide the requested services;
- to fulfill the obligation under the “Consolidated Law on Public Security” (Art. 109, Royal Decree 773/1931);
- to fulfill administrative, accounting, and tax obligations related to the service contracts and management of the contractual relationship;
- to exercise the Data Controller’s rights (e.g., right of legal defense);
- to protect people, property, and company assets via a video surveillance system in certain areas of the premises, as indicated by appropriate signage.

With your explicit and separate consent, your data may also be processed for the following purposes:

- to receive messages and phone calls addressed to you during your stay;
- to retain your identification data for quicker registration during future stays;
- to send offers and commercial communications via email, SMS, or fax;
- to conduct market research and statistical analysis, marketing, and assessments of advertising communications (press, radio, TV, internet, etc.), including preference surveys. These communications may be sent either directly by our company or by a partner company on our behalf.

Legal Basis

Your identifying and tax data is processed for the execution of the contract under Article 6(1)(b) of the GDPR and to comply with legal obligations under Article 6(1)(c) of the GDPR. Provision of this data is necessary and does not require your explicit consent.

Your explicit consent under Article 6(1)(a) is required for:

- receiving messages and phone calls;
- retention of your data for future bookings;
- receiving commercial communications.

Health-related data (e.g., physical disabilities, allergies, etc.) will be processed only with your explicit consent and exclusively for contractual performance under Article 9(2)(a) of the GDPR. Video surveillance data is processed to protect company property and ensure safety, based on the Data Controller's legitimate interest (Article 6(1)(f)). This interest is deemed to override any conflicting rights, interests, or freedoms.

Data Processing Methods

Personal data is processed in paper, electronic, and digital form, in compliance with the principles of Article 5 of the GDPR and the security measures of Article 32, by specifically appointed personnel in accordance with Article 29.

Consequences of Failure to Provide Data

Providing identifying and tax data and its processing are mandatory for the provision of hotel services and to comply with public security requirements. Failure to provide such data may result in our inability to provide the requested services and accommodate you.

Health-related data will only be processed with your explicit consent to meet specific service needs (e.g., room or meal requirements). Refusal to consent relieves the Data Controller of any liability arising from the lack of such data.

Provision of personal data for other purposes is optional and entails no consequences.

Potential Recipients of the Data

For the purposes stated above, your data may be communicated to:

- professional accounting firms providing business support services;
- law firms providing legal services;
- affiliated companies;
- law enforcement authorities as required for public security.

If you have consented to the retention of your data, it may also be shared with Roscioli Hotels S.c.a.r.l. and its consortium companies (Santina S.p.a., Ungheria Società Alberghiera r.l., GT Beta S.r.l., Sfizio al massimo S.r.l., Rodan S.r.l.).

Additionally, the following categories may access your data as authorized and instructed parties: company employees ("authorized persons");

- system administrators;

- service providers for IT and telecom systems (e.g., accounting software, document scanning and consent collection systems);

- Best Western Italia S.c.p.a. (booking system management);

- consultants or other third parties involved in hotel services.

A complete list of Data Processors is available upon request to the Data Controller. Your data will not be publicly disclosed.

Data Transfer

In connection with booking management, your data may be transferred to Best Western International, whose servers may be located outside the EU. Best Western International has taken measures to ensure GDPR compliance.

All other personal data is stored on servers within the European Union. If necessary, the Data Controller may transfer servers outside the EU, in which case standard contractual clauses approved by the European Commission will be used to ensure data protection compliance.

Data Processing Location

Data is processed at the Data Controller's registered office and at group company locations.

Data Retention Period

Data is stored and processed for as long as necessary to fulfill the purposes indicated above. Afterward, personal data will be retained as required by civil and tax law (10 years). Beyond this period, data will be anonymized or deleted.

If you consent to marketing purposes, your data will be processed for no more than 5 years from collection.

Data from individuals who do not purchase or use services and who had only initial contact with our representatives will be deleted or anonymized unless further commercial or market research consent has been validly obtained.

Data Subject Rights

You are entitled to exercise your rights under Articles 15–22 of the GDPR, including the right to access, rectify, delete, restrict, or object to the processing of your personal data and the right to data portability.

Requests to exercise your rights must be addressed to the Data Controller, who will respond within the timeframe set by Article 12 of the GDPR.

At any time, you may lodge a complaint with the Data Protection Authority (Garante per la Protezione dei Dati Personali), Piazza Venezia 11, 00187 Rome, Email: garante@gpdp.it.

Withdrawal of Consent

You have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

CONSENT TO PERSONAL DATA PROCESSING

I, the undersigned _____, pursuant to EU Regulation 2016/679, declare that I have received and carefully read the privacy policy and consent to the processing of my personal data in accordance with the terms and purposes outlined in the notice.

I also declare that I Authorize/Do not authorize the facility to process additional data for the following purposes:

I authorize the facility to process health-related data necessary for the provision of hotel services, as specified in the privacy notice: ☐ Yes ☐ No

I authorize the facility to disclose data relating to my stay exclusively to allow reception of messages and phone calls addressed to me: ☐ Yes ☐ No

I authorize the facility to retain my personal details for faster registration during future stays: ☐ Yes ☐ No

I authorize the facility to send periodic information on rates and offers to my home or email address: ☐ Yes ☐ No

I authorize the facility to process my data for marketing, information, and promotion of products and services, service quality surveys, market research, and other related activities: ☐ Yes ☐ No

Date _____

Signature _____