

 ROME PIAZZA SALLUSTIO	System Documentation GDPR 2016/679 ART'OTEL Piazza Sallustio 18, 00187 Rome Società Immobiliare Alessandro De Gasperis S.r.l. VAT no. 00900931007	Form	INF_____
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Notice on personal data processing pursuant to art. 13 of EU Regulation 2016/679, for Wi-Fi connection users			

In accordance with art. 13 of EU Regulation 2016/679 (hereinafter referred to as the GDPR – General Data Protection Regulation), Società Immobiliare Alessandro De Gasperis S.r.l., appointed as Data Controller with regards to your data, offers the following information on the processing of your personal data while using our facility's Wi-Fi connection.

1. DATA CONTROLLER AND SUPERVISOR

In accordance with art. 4, par. 7 of the GDPR 2016/679, the role of Data Controller is assigned to Società Immobiliare Alessandro De Gasperis S.r.l. with legal offices in Piazza Sallustio 18 – 00187 Rome.

The role of data treatment Supervisor is assigned to the Hotel's General Manager.

2. DATA PROTECTION OFFICER (DPO)

In accordance with art. 37 of the GDPR 2016/679, the Controller has appointed a Data Protection Officer (DPO) that can be reached at the following email address: privacy-rome@artotel.com

The DPO is the company's main institutional contact for all matters relating to personal data processing and allowing the involved parties to exert their rights.

3. PURPOSES AND LEGAL BASIS OF DATA PROCESSING

Your personal data will be used exclusively for purposes related to your use of our Wi-Fi connection, and to allow you to browse the Internet under your exclusive responsibility and within the specified terms and conditions. The Data Controller will only process your personal data insofar as it is necessary to the aforementioned purposes, pursuant to all current data protection laws.

Data processing procedures are legitimate pursuant to art. 6, par. 1, letter b) as necessary to enforcing a contract with the data subject. Additionally, your data may be processed in order to comply with the Controller's legal obligations, and to protect the Controller's legitimate interest in ascertaining, exerting or defending their own rights in a court of law.

Legal compliance conditions are found, respectively, in art. 6, par. 1, letters c) and f).

Personal data falling under the categories (e.g. health conditions) outlined in art. 9, par. 1 of GDPR will not be processed.

4. NATURE, SAFETY MEASURES, AND PROVISION OF DATA

The data provided are necessary to allow access to Wi-Fi services. Failure to provide them will result in failure to use the service.

As an example, we may process information regarding your device's name and MAC address, time of request, and URLs reached by the device.

The Controller enforces adequate safety measures in accordance with art. 32 of the GDPR.

5. PERSONAL DATA CIRCULATION AND RECIPIENTS

The data gathered by the Controller will be processed entirely on systems owned by the Controller, their subsidiaries and/or related companies where thus stipulated or, when required, by other companies formally responsible for data processing (e.g. service providers) pursuant to art. 28 of the GDPR, offering their services on behalf and in the interest of Società Immobiliare Alessandro De Gasperis S.r.l.

Personal data gathered by the Controller will not be forwarded to any third party. Only in the case of illegal acts, and strictly for the aforementioned purposes, will they be shared with the Postal Police or other law enforcement entities.

6. SHARING OF PERSONAL DATA WITH OTHER COUNTRIES OR INTERNATIONAL ORGANISATIONS

The Data Controller is committed to restricting the circulation of personal data (e.g. storing, archiving, and preservation of data on servers owned by the Controller or their Partners) to countries within the European Union, with an explicit prohibition to transfer them to non-EU countries not guaranteeing (or entirely absent) adequate degrees of protection, or absent any of the protection instruments ordained by EU Regulation 2016/679 - TITLE V (adequacy decision, Standard Contractual Clauses, BCR or explicit consent of data subject) in accordance with the requirements outlined in the EU-US Data Privacy Framework.

7. STORAGE OF PERSONAL DATA

The gathered data will be processed for the whole duration of the contractual relationship and pursuant to current law requirements.

8. RIGHTS OF THE DATA SUBJECT

In accordance with art. 15 et seq. of the GDPR 2016/679, you may exert your rights at any time (requesting confirmation of your data's existence, requesting that they be updated, amended, supplemented, erased or blocked, or opposing their processing for legitimate reasons). Additionally, it is your right to file a complaint with the supervisory authorities.

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You may exert your rights by contacting the DPO at the following email address: privacy-rome@artotel.com

9. AUTOMATED PROCESSING

The company does not process data based on automated decision procedures, including for profiling with potential repercussions on your person, legal or otherwise.

The Data Controller