## **Customer Privacy Notice**

Dear Customer,

In accordance with the current regulations on the protection of personal data (Articles 13 and 14 of EU Regulation No. 679 of 2016, hereinafter GDPR), we would like to inform you that the processing of your personal data is carried out with fairness and transparency, for lawful purposes, while safeguarding your privacy and rights.

The processing is also carried out with the aid of computer means for the following purposes:

- 1. To acquire and confirm your reservation of accommodation and related services, and to provide the requested services. As these are treatments necessary for the definition of the contractual agreement and its subsequent implementation, your consent is not required, except in cases where sensitive data are provided. If you refuse to provide personal data, we will not be able to confirm the reservation or provide the requested services. The processing will cease upon your departure, but some of your personal data may need to continue to be processed for the purposes and in the manner indicated in the following points.
- 2. To comply with the obligation established by the "Consolidated Law on Public Security" (Article 109, Royal Decree of June 18, 1931, No. 773), which requires us to communicate to the local police, for public security purposes, the personal details of guests, as established by the Ministry of the Interior (Decree of January 7, 2013). The provision of data is mandatory and does not require your consent; if you refuse to provide it, we will not be able to accommodate you. The data acquired for this purpose is not retained by us unless you provide consent for retention as outlined in point 4.
- 3. To fulfill current administrative, accounting, and tax obligations. For these purposes, processing is carried out without the need to acquire your consent. The data is processed by us and our appointees and is communicated externally only to fulfill legal obligations. If you refuse to provide the data necessary for the above obligations, we will not be able to provide the requested services. The data acquired for these purposes is retained by us for the time period provided by the respective regulations (10 years, and even longer in the case of tax audits).
- 4. To expedite the check-in procedures for your subsequent stays at our facility. For this purpose, upon acquiring your revocable consent, your data will be retained for the maximum period allowed by law for the purposes for which it was collected: 10 years for the obligations referred to in Article 222 of the Civil Code; a maximum of 3 months for credit card data from check-out; a maximum of 3 years from check-out for personal data, special data related to your stay, personal preferences, identification data, handwritten signature, purchase history, and marketing data, and will be used when you are our guest again for the purposes outlined in the previous points, unless otherwise indicated by the data subject; 90 days from check-out for telephone traffic data; 1 year for access and ICT resource data; except for a longer retention period required by specific regulations. In the event of a dispute, personal data will be retained until the statute of limitations for the protection of rights related to the contractual relationship.
- 5. To carry out the function of receiving messages and phone calls addressed to you during your stay. Your consent is required for this purpose. You can revoke your consent at any time. The processing will cease in any case upon your departure.

- 6. To send you our promotional messages and updates on rates and offers. For this purpose, upon acquiring your consent, your data will be retained for a maximum of two years and will not be communicated to third parties. You can revoke your consent at any time.
- 7. For the purpose of protecting people, property, and the company's assets through a video surveillance system in some areas of the facility, identifiable by the presence of appropriate signs. Your consent is not required for this treatment, as it pursues our legitimate interest in protecting people and property from possible attacks, thefts, robberies, damage, vandalism, and for fire prevention and workplace safety purposes. The recorded images are deleted after 24 hours, except on holidays or other business closure days, and in any case no later than one week. They are not subject to disclosure to third parties, except in cases where specific investigative requests are made by the judicial authority or the judicial police.

We would also like to inform you that the European Regulation grants you certain rights, including the right of access and rectification, deletion, limitation, or objection to processing, in addition to the right to data portability, if and to the extent applicable (Articles 15 to 22 of EU Regulation No. 679 of 2016). You can also lodge a complaint with the supervisory authority, in accordance with the procedures provided by current regulations.

For any further information and to exercise the rights granted to you by the European Regulation, you can contact:

Data Controller: Montefalco SRL <u>privacy@leclarissepantheon.com</u> Data Processor: Montefalco SRL <u>privacy@leclarissepantheon.com</u>