

PRIVACY POLICY

Hotel Plaza Spa takes the protection of its customers' privacy to heart by undertaking to preserve the integrity and security of the personal information collected from time to time.

This policy (hereinafter also the "**Policy**") is provided pursuant to art. 13 of the European Data Protection Regulation (EU Regulation 2016/679) and describes the procedures adopted by Hotel Plaza S.p.a. in relation to the collection and processing of personal data of its guests and of those who access the site www.hotelplazavenice.com (the "**Site**"). Furthermore, the Policy explains how we manage and use the personal information collected and how it is used to best meet your needs and offer you the best possible service.

In addition to this, you will find the necessary contact details to be able to contact us if you have any questions regarding your data.

For completeness, we also invite you to read the Cookie Policy, an integral part of this document, which clarifies how our Site uses cookies.

We specify that this Policy is valid for any type of information collected by our Company through our Site, or through the emails sent to us (also through other online platforms), such as the sites of our business partners or social media.

From time to time, we may need to amend this Policy, as well as the Cookie Policy; in the event of significant changes, we will highlight them on our Site; if you want to stay up to date, we therefore recommend that you periodically visit this page, as well as the one relating to the cookie policy.

What kind of personal data do we collect and when do we collect it?

In order to offer you the best possible service, we may collect the following types of data:

- Contact data (contact details): name, email address, telephone number, physical address (for billing);
- Personal details and documents: personal information, documents issued by the authority (e.g. identity card, driving licence, passport (including dates of birth, nationality etc.), document numbers or other identifiers);
- Financial details: credit and/or debit card data (including CVV);
- Information about guests' stay: information about guests' stay, special requests and preferences (including preferred room type or plan, expenses, holiday preferences, services requested, language preferences, interests, hobbies, age of children or travel companions);
- Browsing and system data: IP addresses, domain names, online user account details or profiles when you log in to your Hotel Plaza account etc.;
- - Social media details: social media account information, profile pictures or posts;
- User feedback: feedback and reviews should you decide to release them;
- CCTV/surveillance: images and video recordings obtained through the use of video surveillance systems, all according to the relevant policy;
- Other data: other types of information that you voluntarily provide to us;

- Sensitive data: we do not ask our guests to provide us with data belonging to special categories; nevertheless, if the guest were to communicate it to us, such data will only be processed if and to the extent permitted and required by applicable law or with the explicit consent of the guest.

The data described in this way is collected at various times.

Thus, in order to organise your stay at our accommodation and provide you with the services requested from time to time, or respond to your requests for information, we need to receive some data such as, for example: your name and surname, tax code, date of birth, details of the identity card or other identification document, contact details, names and details of the documents of those travelling with you, payment data, the type of accommodation requested, any special requirements etc... This information may also be collected if you contact our customer service team; both directly and through means/tools such as, for example, social media or our website.

Furthermore, if you choose to pay for the stay at our accommodation by credit card, we will be aware of the data (including the CVV). Our Company will use the credit card data exclusively for the purpose of debiting the expenses and charges relating to your stay at our accommodation, in accordance with the general conditions of service available on our website. We also specify that we rely on external providers to manage payments: these service providers share information on payments, to help us manage it and take care of your booking.

We may then receive information about you through third parties such as, for example, the tour operator or other commercial partner that you contacted to organise your stay. Similarly, our business partners may share information about you with us (and vice versa), for example, if you have a question about an ongoing booking, if you have a dispute about a booking (although we hope that never happens) or if there is communication related to your booking.

Except as specified below, Hotel Plaza does not knowingly process data of minors under the age of 18, as you must be of age to book a stay at our accommodation.

We point out that, if the booking also concerns other people, or if you make a booking on behalf of a third party, during the booking process, you will also be asked to indicate the data relating to them (e.g. name, surname, date of birth, details of the identity card or other identification document, contact details etc.). In this case, we also invite you to submit the Policy to these parties.

That said, whenever you provide personal data relating to third parties, you must have their prior consent. In particular, if you provide data belonging to minors, you must have the consent of the holders of parental responsibility. Without prejudice to the foregoing, Hotel Plaza reserves the right to ask you, at any time, for proof of such consent, in the absence of which, it may not be possible for us to process the request to stay.

We may also collect your data through the social media of our accommodation, for example, when the user "likes", shares content or follows us on social media, such as Facebook, Twitter, Pinterest, Instagram or WeChat. In addition, if you decide to log in, connect or link to the services that we provide through the Site using your social media account, some of your personal data will be shared with us in accordance with your user settings within the social media.

Finally, if you use the Site, or any of our social media, in order to submit your application for professional opportunities open at our accommodation, we will collect the data indicated therein, which will be processed in order to evaluate the application.

Why do we collect and process your data and under what legal basis do we do so?

We collect your data to better manage your bookings and requests for information and thus, offer you the best possible service, as well as to contact you and inform you about discounts and special offers reserved for you.

Below, in more detail, you will find the description of the purposes for which we collect and process your information:

Requests for quotes and/or bookings: first of all, your personal data is used to check your requests for a quote and/or to complete and manage your bookings;

Customer care and communication: we may contact you by email, post, telephone or SMS, depending on the contact method that you have chosen to provide you with information relating to your stay. Furthermore, your data may be used in order to identify requests for assistance;

Legal purposes: we may need to use your information to fulfil the public security obligations set out in art. 109 of the R.D. no. 773/1931 and subsequent amendments and additions (T.U.L.P.S) or, possibly, to manage and resolve any legal disputes that may arise between us, investigations by public authorities, compliance checks and to enforce the terms of use of our services;

Marketing activities: if you have given your authorisation to do so, we will be able to use your information for marketing activities relating to offers and promotions offered by our accommodation, by sending specific newsletters or communication. We specify that, at any time, you can unsubscribe from this communication quickly and easily: in fact, just click on the "Unsubscribe" link present in each newsletter or, if you have created a special account, you can do so directly by accessing it or, again, you can contact us (see the contact data indicated below) asking us to do so. At this point, we will update your profile to make sure that you no longer receive commercial communication. However, please note that it may take a few days for our IT systems to update, so you may continue to receive some communication from us while we process your request;

Reviews on the accommodation and on the stay: if during and/or after your stay at our accommodation, you decide to leave a review (even anonymously), by completing it, you agree to make it visible, for example, on our website or on our social media in order to inform other potential guests about the quality of our accommodation and the services that you have used;

Profiling: we would like to point out that our site uses cookies, including profiling cookies, as better indicated in the relevant cookie policy; where you have authorised the use of these cookies, we will be able to use the data collected through these cookies to analyse your choices, your browsing experiences and your interest in communication so as to offer you a service that is as personalised as possible and in line with your preferences, solely in relation to our services. We also wish to inform you that, during your visits to our Site, we may collect information relating to the devices in use and the networks through which you connect when you use our services. Thus, without limitation, we may collect the following information: IP address, login information, browser type and version, browser plug-in types and versions, operating system and platform, information on the visit, including URL clickstream, accommodation viewed or searched, duration of visits to certain pages. If you wish to disable the aforementioned cookies and, in any case, for further information in relation to them, we invite you to read our cookie policy, which you can find at the following link.

Within the limits of the purposes thus described, the processing of your data takes place pursuant to the legal bases provided for by art. 6 of Reg. (EU) 2016/679 and, precisely:

Performance of a contract/fulfilment of a legal obligation: in order to proceed with the performance of the contract or the performance of pre-contractual measures or, in other words,

with the booking, or to find requests for quotes or information, in order to fulfil a legal obligation to which we are subject and to which is also in relation to the data of any third parties communicated. In these cases, the processing of your data does not require your consent, as their provision is necessary to allow us to fulfil our contractual and/or legal obligations. Although their provision on your part is not mandatory, we specify that, in the absence of such data, it will not be possible for us to provide the requested service;

With your consent: where you have given your specific consent, for marketing purposes and/or in relation to the use of cookies without prejudice to the possibility of revoking your consent at any time. The provision of data for these purposes is optional;

For the pursuit of legitimate interests: in order to pursue our legitimate interests. In this case, your consent is not required.

Do we sell your personal data?

Hotel Plaza does not sell or share your data to third parties without your consent, unless this is done in accordance with this Policy or the law. We want to earn and keep your trust and we believe that this is absolutely critical to doing so.

To whom do we communicate your data?

Without prejudice to the foregoing, we specify that, in order to better manage your booking and your service at our accommodation, we may need to communicate some of your data to third parties involved in various ways in the provision of services rendered by our accommodation, such as, for example, banks, relevant authorities etc.

Furthermore, in some cases we may need to communicate your personal data to certain categories of third parties.

So, for example, when you or the holder of the credit card used to book a booking request a cancellation, we may need to share certain information about the booking with the payment service provider and specific financial institution.

We also share personal data with public security authorities when required by law or when absolutely necessary for the detection, prevention or performance of legal proceedings relating to fraud or crime. Furthermore, we may need to share personal data with the relevant authorities to protect and defend our rights or assets, or the rights and assets of our business partners.

When you make a booking at our accommodation through a tour operator or other commercial partner, some data provided to the latter will also be shared with us. Similarly, it is possible that some of your data is provided by us to the aforementioned commercial partners, for example, to manage a dispute, a booking change etc.

Without prejudice to the foregoing, when you make a booking through a commercial partner (or one of its sites/applications), we invite you to read their privacy conditions carefully in case you want to better understand how your personal data will be managed; we have no power in relation to it.

We point out that your data may be accessible to external suppliers of professional services, such as IT consultants in case of maintenance/updating of our IT systems, or consultants in legal, administrative, accounting and tax matters; in this case, we will ensure that the aforementioned consultants undertake to keep the data confidential and to treat it appropriately.

Finally, we point out that we may provide third parties with aggregated and anonymised information and analytical data of our customers, provided that, before doing so, we will ensure that such data cannot be traced back to any specific customer.

Your information and non-European countries

Our company is based in Italy. Nonetheless, for data processing, we could make use of IT systems (e.g. email providers, data storage systems), whose server could be located outside the European Union. In this case, our Company undertakes to guarantee compliance with the legislation established by EU Regulation 2016/679 on the protection of personal data. In particular, in the event of transfer of data to a non-European country, we will ensure that the transfer takes place in accordance with the provisions of the aforementioned Regulation, as well as with this Policy and that it is governed by standard contractual clauses that guarantee adequate protection for you and your data. We will ask that the same precautions are also adopted by third parties to whom we may have to communicate your data in accordance with what is indicated in this Policy.

How do we manage the security of your data?

It is in our interest to ensure the security of your data in accordance with applicable data protection regulations.

To this end, we have implemented a series of internal procedures and use special technical-IT security systems.

In addition to this, we have also foreseen and implemented security procedures and technical-physical limitations in order to prevent access and use of the personal data contained in our physical servers/archives by unauthorised parties and/or in violation of the purposes referred to in this policy.

Furthermore, we have implemented an authorisation system that only allows authorised personnel to access the data necessary from time to time to carry out their duties and we make sure that any third party to whom we have to communicate your data undertakes to maintain strict confidentiality and to use it exclusively for the purposes indicated in this policy.

How long will we keep your data for?

In accordance with the principles of proportionality and necessity, your personal data will not be stored for longer than necessary to achieve the purposes for which the data is collected, without prejudice to legal obligations regarding data retention. The personal data that we process on the basis of your consent, including consent to marketing activities or consent to the processing of special categories of personal data (if any) or data connected to the creation of an account, may be used and stored until revocation of the consent and/or the cancellation of the account. Furthermore, if reasonably necessary or required to comply with legal or regulatory requirements, manage disputes, prevent fraudulent behaviour and abuse or to enforce our contractual terms and conditions (e.g. booking cancellations, applying penalties etc.), we may keep some of your personal information even after the closure of the account for the duration required by applicable tax and accounting laws. At the end of the retention period, your data will be irreversibly deleted or in any case, rendered anonymous.

Your rights in relation to the data

Pursuant to EU Regulation 676/2016, there are many rights that you have in relation to your personal data. First, you always have the right to request access to the personal data collected by our company. You can then ask for it to be corrected in the event of any errors/changes, or for cancellation. And again, you can ask us to limit the processing of data or oppose the processing.

However, we would like to point out that, where the communication of data and the related processing responds to a legal obligation, or is necessary for the conclusion of a contract (e.g. the booking at our accommodation), the request for cancellation and/or your opposition to the related processing, could prevent us from completing the booking and providing you with the requested services. We specify that the revocation of the consent given does not affect the lawfulness of the processing carried out before this revocation and based on your consent. Finally, you have the right to request us to transfer all or part of your data to another service provider, as well as the right to lodge a complaint pursuant to art. 13 of EU Regulation 679/2016 to the supervisory authority.

To exercise any of the above rights, if you have any complaints or questions, you can contact us at info@hotelplazavenice.com.

Who is the holder of personal data

The Data Controller is Hotel Plaza S.p.a., a company incorporated under Italian law, based in [●].