



hotel Michelangelo  
SORRENTO  
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PRIVACY MANAGEMENT SYSTEM  
REG. EU 679/2016

CUSTOMER INFORMATION (ART.13 - 14)

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Pursuant to art. 13 of regulation (EU) no. 2016/679 of the European Parliament and of the Council of 27/04/2016, hereinafter GDPR, the Company SIGRATSPA - HOTEL MICHELANGELO, as owner, informs you of the following:

**A) Purpose of data processing and legal basis**

Your personal data are processed for the following Service Purposes:

- A1) Acquisition of personal and particular customer data such as name, surname, telephone number and address, e-mail address and credit card number, to carry out the reservation request at the structure, which can arrive through different channels, such as from the site [www.michelangelosorrento.com](http://www.michelangelosorrento.com), from third party sites, by e-mail or by telephone;
- A2) Management of the receipt of any phone calls, messages, correspondence, gifts, or other communications from which your presence in the hotel can be deduced, management, at your request, of further internal and external services that involve the communication of your personal data;
- A3) acquisition of personal data such as name, surname, date of birth, e-mail, telephone number, address, to carry out marketing activities, newsletters, sending promotional communications, storage of data relating to your stay, even after your departure, in order to offer you personalized services based on your preferences, when you decide to still be our guest;
- A4) acquisition of personal and particular data of customers upon entering the facility with related food intolerances and / or specific problems;
- A5) acquisition of identification documents necessary for the reporting of any state / regional promotional activities (holiday bonus, etc.)
- A6) Fulfill the obligations established by the hotel hospitality contract, administrative, accounting and tax obligations, by law, by a regulation, by community legislation or by an order of the Authority (such as, for example, in the field of anti-money laundering);
- A7) Exercise the rights of the owner, for example the right to defense in court;

**Methods of data processing**

The data concerning your person will be processed in accordance with the current legislation above. In particular, personal data will be processed using manual and IT and / or telematic tools, in order to guarantee their security and confidentiality, as well as full compliance with the law.

**B) Categories of data and relative origin**

The object of the processing is the personal data concerning your person, provided by the interested party, by filling in the fidelity cards within the points of sale or through online purchases by registering on the site, as well as those that may be subsequently transmitted in another way. Therefore, we inform you that the personal data being processed are collected directly by the data subject.

**C) Nature of the provision of data**

Your personal data being processed are collected directly by the interested party.

With reference to the purposes referred to in points A1), A2), A3) and A4), the provision of data is necessary in order to fulfill the aforementioned purposes as well as legal and contractual obligations. The processing of data for this purpose requires your consent.

With reference to the purposes referred to in points A5), A6) and A7), the provision of data is mandatory in order to fulfill the purposes of this point and the processing of data for these purposes does not require your consent.

**D) Communication scope**

Within the limits relevant to the purposes of the processing of the data indicated, only authorized collaborators of their processing and belonging to the organizational structure of the Data Controller may become aware of the same.

It should be noted that your data may be transmitted to the following recipients:

- Internal authorization for treatments
- IT company

The list is available at the headquarters of the Data Controller

**E) Retention period**

In accordance with the principle of "conservation limitation" pursuant to art. 5, of Regulation (EU) no. 679/2016 (GDPR), the data collected subject to processing for the purposes indicated above, will be stored according to the deadlines set by the law and, subsequently, for the time in which the Company is subject to conservation obligations for the intended purposes. by law or regulation. The verification of the obsolescence of the data stored in relation to the purposes for which they were collected is carried out periodically.

In any case, data retention is expected for a maximum period of:

- Booking data = 1 year
- Marketing data = 1 year
- Receipt data = 10 years

**F) Profiling and dissemination of data**

Not applicable;



### G) Rights of the interested party

In your capacity as an interested party, you have the rights referred to in art. 15 GDPR and precisely the rights of:

1. to obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
2. to obtain the indication: a) of the origin of the personal data; b) the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) the identity of the owner, manager and the representative appointed pursuant to art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the State, managers or authorized;
3. to obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data which need not be kept for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment is proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
4. to object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the interested party to exercise the right of opposition also only partially.
5. Right to rectify your personal data in the event that they are modified and do not correspond to those previously acquired or communicated (Article 16)
6. Right to delete data ("right to be forgotten" art. 17). SIGRATSPA - HOTEL MICHELANGELO, if one of the following cases exists, deletes the data from all databases and archives where it is contained:
  - a) the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
  - b) the interested party revokes the consent and if there is no other legal basis for the processing;
  - c) the interested party opposes the processing pursuant to Article 21, paragraph 1, and there is no legitimate overriding reason to proceed with the processing, or opposes the processing pursuant to Article 21, paragraph 2;
  - d) the personal data have been unlawfully processed;
  - e) the personal data must be deleted to fulfill a legal obligation under the law of the Union or of the Member State to which the data controller is subject;
  - f) the personal data have been collected in relation to the offer of information society services referred to in Article 8, paragraph 1.
7. Right to restriction of processing (Article 18). The interested party has the right to obtain from the data controller the limitation of the processing when one of the following hypotheses occurs:
  - a) the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
  - b) the processing is unlawful and the interested party opposes the cancellation of personal data and requests instead that its use be limited;
  - c) although the data controller no longer needs them for processing purposes, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court;
  - d) the interested party opposed the processing pursuant to Article 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.
8. Right of opposition (art. 21-22): The interested party has the right to object at any time, for reasons connected to his particular situation, to the processing of personal data concerning him pursuant to article 6, paragraph 1, letters e) or f), including profiling on the basis of these provisions. SIGRATSPA - HOTEL MICHELANGELO does not submit data to decisions based solely on automated processing. Propose a complaint to a supervisory authority (Authority for the protection of personal data - based in Rome, Piazza Monte Citorio n.121 - [www.garanteprivacy.it](http://www.garanteprivacy.it));

### H) Data controller and person in charge of the protection of personal data

The Data Controller is SIGRATSPA - HOTEL MICHELANGELO with registered office in Corso Italia n. 275 - 80067 Sorrento (Na) with VAT number 01245081219.

The Data Controller can be contacted at the following e-mail address: [info@michelangelosorrento.com](mailto:info@michelangelosorrento.com)



## CONSENT

I hereby, for all purposes of law and regulation, declare that I have received and read the information and declare to give \ not to give the free, aware, informed consent to the processing of data carried out by you and, in particular, with reference to the following activities:

- collection and processing of personal data for booking activities, as indicated in point A1) of the purpose of the processing.

I AGREE

I DO NOT AGREE

- collection and processing of personal data for marketing activities, as indicated in point A2) of the purpose of the processing.

I AGREE

I DO NOT AGREE

- collection and processing of personal data for the reception activities, as indicated in point A3) of the purpose of the processing.

I AGREE

I DO NOT AGREE

- collection and processing of personal and particular data, as indicated in point A4) of the purpose of the processing.

I AGREE

I DO NOT AGREE

Place and date