

PRIVACY POLICY – LUNA S.r.l.

PURSUANT TO ARTICLES 13 AND 14 OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 AND LEGISLATIVE DECREE 196/2003 AND SUBSEQUENT AMENDMENTS AND ADDITIONS.

During consultation of this website, personal information and data may be collected, as indicated in this privacy policy. This privacy policy refers exclusively to this website.

The Data Controller

The Data Controller is **LUNA S.R.L.**, VAT Number/Tax Code 03253100279, with registered office at Fondamenta delle Burchielle Santa Croce 395, 30135 Venice (VE). To exercise your rights listed above, you may contact the following telephone number: +39 041 711041 or send a message to the E-mail address: info@hotel-olimpia.com

The Data Controller has not identified a Data Protection Officer (DPO), as it is not subject to the obligation to appoint one under Article 37 of the Regulation.

Type of data processed and purpose

Browsing Data

During normal operation, the computer systems and software used to operate this website acquire certain personal data, the transmission of which is implicit in the use of Internet communication protocols. This category of data includes the IP addresses or domain names of the computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This data, which is necessary to use web services, is also processed for the purpose of:

- obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.);
- check the proper functioning of the services offered. Browsing data is not retained for more than seven days (except in the case of criminal investigations by judicial authorities).

Data disclosed by the user

The optional, explicit and voluntary sending of messages to the Data Controller's contact addresses, private messages sent by users to profiles/pages on social media (where this possibility is provided for), and the completion and submitting of forms on the Data Controller's website, entails the acquisition of the sender's contact data, which is necessary for responding, and all personal data included in the communications. The provision of some of the data subject's personal data is mandatory to use the services requested, and failure to provide such data may prevent access to them.

Mandatory personal data are marked with an asterisk. If certain data is indicated as not mandatory, the data subject is free to refrain from communicating that data, without this having any consequence on the availability of the service or its operation.

Data subjects who have any doubts as to the data required are encouraged to contact the Data Controller.

In particular, data may be collected through:

The "BOOK NOW" page

When visiting the "BOOK NOW" page, the user will be redirected to the booking engine where he/she can make a reservation. For further information, please refer to the privacy policy on that website.

Cookies and other tracking systems

For details see the cookie policy presented on this website.

Legal basis for the processing

The legal basis for the processing is as follows:

- processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6, paragraph 1, letter c) of EU Regulation 2016/679;
- processing is necessary to pursue the legitimate interest of the Data Controller or third parties, pursuant to Article 6, paragraph 1, letter f) of EU Regulation 2016/679;
- Processing is necessary on the basis of a contract to which the data subject is party or the execution of pre-contractual measures taken at the request of the data subject, pursuant to Article 6, paragraph 1, letter b) of EU Regulation 679/2016;
- processing is carried out on the basis of the data subject's expression of consent, pursuant to Article 6, paragraph 1, letter a) of EU Regulation 2016/679.

However, the Data Controller may be requested to clarify the concrete legal basis of each processing operation and, in particular, to specify whether the processing is based on the law or on a contractual or pre-contractual relationship.

Processing methods

Data is processed by the appointed company personnel and are not disclosed to unauthorised third parties.

Processing is carried out using computer and/or telematic tools and in automated and/or manual mode, in compliance with the provisions of Article 32 of GDPR 2016/679 on security measures, by specially appointed persons and in compliance with the provisions of Article 29 GDPR 2016/ 679. The Data Controller adopts appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of personal data.

In addition to the Data Controller, in some cases, other subjects involved in the provision of the services offered and in the organisation of this website (hosting providers, IT companies, filing, collection, printing and mailing companies, communication agencies, postal couriers) may have access to the data, in addition to external persons appointed, if necessary, by the Data Controller as Data Processors. The updated list of Data Processors can always be requested from the Data Controller.

Transfer of personal data

Data is processed at the Data Controller's offices and at any other place where the parties involved in the processing are located. For further information, please contact the Data Controller.

The data subject's personal data will not be transferred outside of the European Union.

Retention Period

In compliance with the principles of lawfulness, limitation of purposes and data minimisation, pursuant to Article 5 of GDPR 2016/679, the data subject's personal data will be retained for the time necessary to achieve the purposes for which it is collected and processed or to defend/exercise a right. When the processing is based on the data subject's consent, the Data Controller may retain the personal data longer until such consent is revoked.

Furthermore, the Data Controller may be required to retain personal data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the personal data will be deleted. Therefore, once this period has expired, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

The Data Subject's rights

Pursuant to Articles 15 to 22 of EU Regulation 2016/679, at any time, the data subject may exercise the right to:

- a) request confirmation of the existence or otherwise of the personal data;
- b) obtain information on the processing purposes, the categories of personal data, the recipients or categories of recipients to whom the personal data is or will be disclosed and, where possible, the retention period;
- c) obtain rectification and deletion of data;
- d) obtain processing limitation;
- e) obtain portability of data, i.e. receive the data from a data controller, in a structured, commonly used and machine-readable format, and transfer them to another data controller without hindrance;
- f) object to the processing at any time; data subjects are reminded that, if their data is processed for direct marketing purposes, they may object to the processing without justification;
- g) ask the data controller for access to and rectification or erasure of the personal data or restriction of its processing, in addition to the right to data portability;
- h) withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given prior to withdrawal;
- i) lodge a claim with a supervisory authority.

The data subject has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), based in Rome, via di Monte Citorio 121 (tel. +39 06696771), following the procedures and instructions published on the Authority's website www.garanteprivacy.it

Data Controller Contacts

Please use the contacts below to contact the Data Controller:

- by e-mail, at: info@hotel-olimpia.com
- by telephone: +39 041 711041
- by ordinary mail: Fondamenta delle Burchielle Santa Croce 395, 30135 Venice