

	System Documentation - GDPR 2016/679	Form	INF01_01
	Suite Gold Via Frattina, 81 00186 - Rome – Italy	Revision	1
	PENTA 4 S.R.L – Via Frattina 81 - 00186 Rome Tax Code and VAT: 06827820967	Last update:	10-05-2021
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PRIVACY POLICY			

WHAT A PRIVACY POLICY IS

These pages provide the policies for the security of personal data that PENTA 4 S.r.l. follows for users who consult our website and, more generally, for data subjects that interact with our guesthouse on various bases.

The information is given in accordance with Article 13 of the Regulation (EU) 2016/679 (hereinafter referred to as GDPR - General Data Protection Regulation), in particular for those who use the Rome Suite Gold Guesthouse web services, accessible on line from the following address:

<https://www.suitegold.com>

The information only applies to the Suite Gold Guesthouse website and not also to any other websites that users consult from a link.

DATA CONTROLLER AND PROCESSOR

- In accordance with Article 4.7 of the GDPR, the Website's data controller is PENTA 4 S.r.l., with registered office at Via Frattina no. 81, 00186 Rome;
- In accordance with Article 28 of the GDPR, third-party data processor and System Administrator for the management of the guesthouse's website and online booking platform www.blastnessbooking.com integrated into the website is BLASTNESS S.r.l., with registered office at P.zza J.F. Kennedy no. 27, 19125 La Spezia (SP), Tel. no. +39 0187 599737- Fax no. +39 0187 020349 – email: info@blastness.com.

PLACE OF DATA PROCESSING

The processing connected with the web services of this website takes place at the premises of the data controller and data processor and is conducted only by the service's technical personnel that are in charge of data processing.

TYPES OF DATA PROCESSED

Browsing data

During the normal course of their operations, the IT systems and software procedures used in the functioning of this website acquire some personal data whose transmission is implicit in the use of internet communication protocols. This is information that is not collected in order to be associated with identified data subjects, but that, by its very nature, could enable users to be identified by means of computerised operations and associations with data held by third parties. Falling under this category of data are IP addresses or domain names of the computers employed by users that connect with the website, the uniform resource identifier (URI) notation addresses of the resources requested, the time of the request, the method used in submitting the request to the server, the dimensions of the file obtained in reply, the numerical code indicating the status of the reply (successful, error, etc.) given by the server and other parameters concerned with the user's operating system and IT environment. These data are used for the sole purposes of obtaining anonymous statistics regarding the use of the website and monitoring that it functions correctly and are

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erased immediately after being processed. Data could be used to ascertain responsibility in the event of possible computer crimes committed against the website but, apart from this contingency, data regarding contacts with the website do not remain for more than thirty days at present.

Data provided voluntarily by users

Sending an email to one of the addresses on the website is an optional, deliberate and voluntary act. If users do so, this entails the subsequent acquisition of the sender's email address, which is necessary in order to respond to requests, in addition to the acquisition of any other personal data included in the message.

If users fill in a voluntary data entry form in order to request special services, accept offers or buy services and products, their personal data will subsequently be processed in order to perform a contract to which the users are a party or in order to take steps at the users' request prior to entering into a contract.

The company has taken special measures to ensure that the processing of users' data is preceded by a voluntary act on their part that confirms that they have read this privacy policy.

Cookies

Reference should be made to the Cookie policy.

Minors

The services on this website are not intended for those less than 16 years old. We do not knowingly collect data, including personal data, belonging to minors.

Should we learn that we have obtained the personal data of a minor, we will erase them immediately unless we are legally obliged to preserve them. Users are requested to contact us if they believe that the guesthouse has wrongly or accidentally collected information regarding a minor.

METHOD OF PROCESSING

Personal data are processed by automated means for the time necessary to achieve the purposes for which they have been collected. Special security measures are observed to prevent the loss or illicit or incorrect use of data and unauthorised access to them.

PURPOSES, LEGAL BASIS AND NATURE OF PROVISION OF PERSONAL DATA

The Personal Data you provide through the Website will be processed by the data controller for the following purposes:

- a) purposes related to the performance of a contract to which you, as the data subject, are a party or to taking steps at your request prior to entering into a contract (e.g. bookings, taking up special offers, etc.). *The legal basis of the processing is to be found in Article 6, paragraph 1.b, of the GDPR, i.e., processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Consent not necessary;*
- b) purposes related to receiving promotional and commercial material after voluntarily registering to the Guesthouse newsletter. *The legal basis of the processing is to be found in Article 6, paragraph*

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- 1.a, of the GDPR, i.e., it requires your explicit request or the sending of soft spam (Article 130, paragraph 4, of Legislative Decree 196/2003);*
- c) *for considering you as a possible candidate for employment by acquiring your CV by email as an offer of services. As there is no data entry form, this only requires you to read this privacy policy. The legal basis of the processing is to be found in Article 111-bis of Legislative Decree 196/2003 and in Article 6, paragraph 1.a, of the GDPR;*
 - d) *for our research into and statistical analysis of anonymous aggregate data with the purposes of monitoring the functioning of the Website, checking traffic and evaluating usability and interest in order to render it more practical and improve its performance. Consent not necessary in that these activities do not constitute the processing of personal data;*
 - e) *for profiling by means of third-party cookies. The legal basis of the processing is to be found in Article 6, paragraph 1.a, in compliance with Directive 2009/136/EC of 25 November 2009. Consent necessary as per the Cookie Policy;*
 - f) *to comply with legal and regulatory obligations. The legal basis of the processing is to be found in Article 6, paragraph 1.c, of the GDPR. Consent not required;*
 - g) *purposes of establishing, exercising or defending a right in judicial proceedings or at every such time as jurisdictional authorities perform their jurisdictional functions. The legal basis of the processing is to be found in Article 6, paragraph 1.f, of the GDPR. Consent not required.*

The data we process may include particular categories of personal data, as defined by Article 9 of the GDPR, i.e. personal data regarding state of health or religion (food allergies, kosher breakfasts, services for persons with special needs, special menus on religious grounds, etc.) that you provide voluntarily, after your consent, in the boxes of the booking form for Notes.

We will process these data assuring you that we will take the appropriate security measures insofar as they regard the data and operations indispensable for complying with the obligations, including pre-contractual obligations, that the guesthouse assumes in its field of activity in order to provide certain goods, supplies or services required by you, as the data subject.

In accordance with Article 9 of the GDPR, nevertheless, we will always ask for your explicit consent to the processing of your personal data, since we are not in a position, a priori, to know whether you will voluntarily include data that fall under the above category in the personal data entry form.

MANAGEMENT OF CVs

These notes for information prepared in accordance with Article 13 of Regulation (EU) No. 2016/679, may also be used by the data controller for any announcements published for the recruitment of staff in sites and portals that it does not manage directly.

The Company will process CVs that it receives by email or from third-party recruitment firms (announcements on portals, etc.) to consider possible candidates inside the company or that could present themselves in the near future.

CVs are processed digitally except for those received by post.

CVs considered “interesting” will be stored at the company’s head office for a period of not more than one year and will be processed in full compliance with minimum security requirements referred to in Article 32 of the GDPR.

CVs considered unsuitable and CVs that have been stored for over 18 months will be binned.

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However, CVs will be stored at the Suite Gold Guesthouse and will not be sent to third parties.

In any case candidates are kindly requested to observe the following rules in sending CVs in digital format:

1. fill in your CV in European format;
2. send the CV in PDF;
3. do not include the particular categories of personal data defined in Article 9 of the GDPR in your CV (particularly those regarding state of health and religious, philosophical or political convictions): they are not pertinent to the job vacancy;
4. give your consent to the processing of the sensitive data pertinent to the commencement of an employment contract (for example your belonging to a protected category).

The company reserves the right, however, not to discard CVs that do not satisfy the requirements referred to above.

The purposes of processing data, as regards the management of CVs, are strictly related to the appraisal, recruitment or selection of personnel, the aims being to engage collaborators, fixed-term or permanent staff, interns or candidates selected to prepare their degree thesis at our Head Office.

TRANSFER OF PERSONAL DATA

The data controller undertakes to limit the areas within which personal data are circulated and processed (e.g. memorising, storing, preserving data on its servers) to European Union countries; it is expressly prohibited to transfer them to non-EU countries that do not provide a sufficient level of protection (or in which there is no protection), or in which there are no instruments for their protection as provided for in CHAPTER V of Regulation (EU) 2016/679 (adequacy decision, Standard Contractual Clauses or the data subject's explicit consent).

DISCLOSURE OF PERSONAL DATA

Personal data obtained through this website may be disclosed to:

- public bodies or offices pursuant to legal and/or contractual obligations;
- Blastness S.r.l., with registered office at P.zza J.F. Kennedy no. 27, 19125 La Spezia (SP), the firm responsible for technical assistance for the booking platform;
- DGNET S.r.l., with registered office at Via Piantanida no. 12, 50127 Firenze (FI), the firm responsible for technical assistance for the website;
- Penta 4 S.r.l., with registered office at Via Frattina no. 81, 00186 Rome, the firm that assists the data controller in managing the guesthouse's operations;
- banking institutions for the management of receipts and payments related to e-commerce dealings;
- any specifically appointed third-party consultants and firms that provide fiscal and tax consulting services;
- AG Consulting S.r.l., with registered office at Via Nazionale no. 200, 00184 Rome, for direct marketing (*subject to explicit consent or the sending of soft spam messages*) and revenue management;
- couriers for the dispatch of products.

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An updated list of third-party data processors appointed in accordance with Article 28 of the GDPR can be requested of the data controller.

DATA STORAGE

The data controller will process the data subjects' personal data for the time strictly necessary for the achievement of the purposes set out in these notes.

By way of example only, the guesthouse will process the Personal Data for the newsletter service until such time as the data subject decides to unsubscribe from the service by merely clicking on the email that has been received.

Without prejudice to the above provisions, the data controller will process your Personal Data in order to safeguard its interests for as long as is permitted under Italian law (Article 2947(1)(3) of the Italian Civil Code).

You can obtain more information regarding the period of storage of your Personal Data and the criteria adopted for determining the length of this period by writing to privacy@boutiquecentralepalace.com.

AUTOMATED PROCESSING

The company does not carry out processing based on an automated decision-making process, including profiling, that have legal effects or can significantly affect the data subject.

DATA SUBJECTS' RIGHTS

Users may freely exercise the rights set out in Articles 15 ff. of the GDPR, i.e., the right to:

- withdraw their consent at any time. Users may withdraw the consent that they have previously given to the processing of their Personal Data;
- object to the processing of their Data. Users may object to the processing of their Data when they are processed on a legal basis other than consent;
- obtain access to their Data. Users have the right to obtain information on the Data processed by the Data Controller and on certain aspects of the processing and to receive a copy of the Data processed;
- verify their personal data and ask for them to be rectified. Users may verify that their Data are correct and request that they are updated or rectified;
- obtain the restriction of processing. In certain circumstances, Users may ask for the processing of their Data to be restricted. In this case the Data Controller will process the Data for no other purpose than that of storing them;
- obtain the erasure or removal of their Personal Data. In certain circumstances, Users may ask the Data Controller to erase their Data;
- receive their Data or transfer them to another data controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have their data transferred without hindrance to another data controller. This provision applies when

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the Data are processed by automated means and the processing is based on Users' consent, on a contract to which Users are parties or on contractual provisions related thereto;

- lodge a complaint. Users may lodge a complaint with the competent supervisory authority for the protection of personal data or bring a court case.

HOW TO EXERCISE YOUR RIGHTS

In order to exercise your rights, the data subject can contact the data controller by writing an email to: privacy@boutiquecentralepalace.com.

REVISION AND FUTURE EDITIONS

This edition 1 of 10 May 2021 of the privacy policy is Revision 1. The privacy policy may be revised again in the future.