

HOTEL NEWSLETTER PRIVACY NOTICE

This notice is provided to natural persons who access and consult the website **portoveneregrand.com**, pursuant to Article 13 of Legislative Decree 196/2003 ("Personal Data Protection Code") and Article 13 of GDPR 679/16 ("European General Data Protection Regulation").

Identity of the Data Controller

The Data Controller is **Frontemare S.r.l.**, through its legal representative pro tempore, with registered office in Milan, Via Leopardi 8, VAT no. 08659570967; PEC: frontemaresrl@arubapec.it. The Controller guarantees the security, confidentiality, and protection of personal data at every stage of processing. Collected personal data are used in compliance with Legislative Decree 196/2003 and GDPR 679/16.

Data Protection Officer (DPO)

The Controller has appointed as Data Protection Officer:

Avv. Raffaella Nerini, Tax Code: NRRFL73R44E463J, with office in La Spezia, Viale Italia 391, 19125, PEC: avvraffaellanerini@pec.giuffre.it, tel. +39 0187 564070.

Data Subjects

This notice is addressed to natural persons who subscribe to the newsletter offered by Grand Hotel Portovenere.

Source of Data

Data are provided directly by the Data Subject.

Purpose of Processing

To send, by email, information about the Controller's activities as well as commercial or promotional information regarding Grand Hotel Portovenere.

Legal Basis of Processing

The legal basis for processing is the consent of the Data Subject.

Requirement to Provide Data

Providing data for the purposes of receiving newsletters for informational, promotional, or commercial purposes is optional. Refusal to provide consent will result in the impossibility of being kept informed about the Controller's initiatives and/or promotional campaigns, and of receiving offers or other promotional material.

Methods of Processing

Data will be processed by staff and collaborators of the Controller, duly authorized or designated as data processors, using electronic systems and online platforms.

Data Recipients

Without prejudice to disclosures required by law, the Controller does not communicate personal data to third parties, except to:

- System Administrators and web service providers managing the website,
- Service companies carrying out outsourced activities on behalf of the Controller,
- Consultants (including companies or associations),
all of whom are appointed as external data processors. The list of external processors can be consulted upon request.

Data Transfers

The Controller does not transfer personal data to non-EU countries or international organizations,

but reserves the right to use cloud services, selecting providers who offer adequate safeguards under Art. 46 GDPR 2016/679. Some personal data may be transferred outside the EU by external processors in the course of providing services to the Controller. In such cases, transfers will comply with GDPR Chapter V safeguards (European Commission adequacy decision; or, in its absence, Standard Contractual Clauses approved by the Commission; and any supplementary measures necessary to ensure an EU-equivalent level of data protection).

Copies of such safeguards or their location may be obtained by contacting the Controller using the contact details in this notice.

Data Retention

The Controller retains data for as long as necessary to provide the requested service, for a maximum of two years from subscription, or until consent is withdrawn, if earlier.

Data Subject Rights

You may exercise the following rights with the Controller:

- **Access** to personal data and related information (Art. 15 GDPR);
- **Rectification** of inaccurate or incomplete personal data;
- **Erase** of personal data ("right to be forgotten") in the cases provided by Art. 17 GDPR;
- **Restriction** of processing in the cases provided by Art. 18 GDPR;
- **Portability** of your personal data in a structured, commonly used, machine-readable format (Art. 20 GDPR);
- **Objection** to processing based on Art. 6.1.e or f GDPR, for reasons related to your personal situation (Art. 21 GDPR). In such cases, the Controller will refrain from further processing unless there are compelling legitimate grounds overriding your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims;
- **Not to be subject** to a decision based solely on automated processing, including profiling, producing legal effects or similarly significant impacts (Art. 22 GDPR, except where otherwise permitted).
- **Lodge a complaint** with the Supervisory Authority if you believe your data have been unlawfully processed.

To exercise these rights, you may send a request via PEC email to frontemaresrl@arubapec.it or by registered mail to the Controller's office in Portovenere (SP), Via Garibaldi 5, CAP 19025. Requests may also be addressed to the DPO (see section 2).

Withdrawal of Consent

Whenever processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. You may exercise this right by sending a PEC email to frontemaresrl@arubapec.it or by registered mail to the Controller's office in Portovenere (SP), Via Garibaldi 5, CAP 19025.

Automated Decision-Making

The Controller does not carry out processing involving automated decision-making.