

## Privacy Notice on the Processing of Personal Data – GDPR 2016/679

Frontemare S.r.l., through its legal representative pro tempore, informs you that for the services provided by Grand Hotel Portovenere, it will act as Data Controller of some of your data, which qualify as personal data pursuant to Regulation 2016/679. The processing will be carried out in compliance with the law and will be guided by the principles of fairness, lawfulness, transparency, and protection of your privacy and rights.

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### 1. Who is the Data Controller?

Personal data will be processed by:

**Frontemare S.r.l.**, through its legal representative pro tempore, with registered office in Milan, Via Leopardi 8, VAT no. 08659570967; Certified Email (PEC): frontemaresrl@arubapec.it, as Data Controller pursuant to GDPR 2016/679, for Grand Hotel Portovenere, located in Portovenere (SP), Via Garibaldi 5, tel. +39 0187 777751.

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### 2. Is there a Data Protection Officer (DPO)?

The Controller has appointed as Data Protection Officer (DPO):

**Avv. Raffaella Nerini**, Tax Code: NNRNFL73R44E463J, with office in La Spezia, Viale Italia 391, 19125, PEC: avvraffaellanerini@pec.giuffre.it, tel. +39 0187 564070.

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### 3. What types of data are collected?

The Hotel collects and processes the following personal data:

- **Identification data:** name, surname, date of birth, gender, nationality
  - **Contact details:** email address, phone number, home address
  - **Payment data:** information relating to the chosen payment method (credit/debit cards, cash)
  - **Stay data:** check-in and check-out dates, room type, special requests
  - **Stay-related data:** food preferences, special needs, activities during the stay
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### 4. How are data collected?

Personal data are provided directly by the Data Subject to the Controller or collected through third parties such as:

- Online Travel Agencies (OTAs) (e.g., Expedia.com, Booking.com)
  - Travel agencies
  - Entities, associations, organizations, companies, or private individuals organizing events or stays at the Hotel
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### 5. For what purposes are data processed, and on what legal bases?

Purpose	Legal Basis
Management of reservations and stays, provision of requested services	Performance of a contract (Art. 6.1.b GDPR) for common data; Consent of the data subject (Art. 6.1.a GDPR) for special categories of data
Upon explicit client request, booking of external services (restaurants, taxis, guided tours, or other third-party services)	Performance of a contract (Art. 6.1.b GDPR)
Sending promotional communications and newsletters (with consent only)	Consent of the data subject (Art. 6.1.a GDPR)
Call/message transfers to rooms or delivery of packages and correspondence (with consent only)	Consent of the data subject (Art. 6.1.a GDPR)
Retention of a copy of ID document for administrative and security purposes (with consent only)	Consent of the data subject (Art. 6.1.a GDPR)
Protection of the Controller's rights	Legitimate interest of the Controller (Art. 6.1.f GDPR) or necessity to establish, exercise, or defend a legal claim (Art. 9.2.f GDPR)

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### 6. Is the provision of personal data necessary? Can you refuse?

The provision of data is necessary for the execution of the contractual relationship and therefore mandatory to establish it. Refusal to provide all or part of the requested data will make it impossible for the Controller to perform the contract or to properly fulfill related obligations. In line with the principle of data minimization, only the data strictly necessary for the stated purposes will be requested.

With respect to purposes based on consent, refusal will not affect contractual obligations but will mean that processing for those purposes will not take place.

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#### 7. How are the collected data processed?

Data are processed by staff and collaborators of the Controller, duly appointed as authorized personnel and/or processors, using the following means:

- Electronic devices and IT systems
  - Manual processing through paper archives
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#### 8. Who will have access to the data? Who are the recipients?

In addition to mandatory disclosures required by law or contract, data may be communicated only for the above purposes to:

- Public authorities, tax offices, police authorities (for legal obligations)
- System administrators, consultants, or professionals (appointed as processors)
- Banks and credit institutions (for payments)
- Insurance companies (in case of claims)
- Accounting/tax advisory firms (processors)
- IT service providers (processors)
- Service companies performing outsourcing activities on behalf of the Controller (processors)
- External service providers (taxis, guided tours, experiences, etc.) if explicitly requested by the Client

The list of appointed external processors can be consulted by requesting it from the Controller.  
Data will not be publicly disclosed.

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#### 9. Could data be transferred outside the EU?

The Controller does not transfer personal data outside the EU or to international organizations but reserves the right to use cloud services, selecting providers offering adequate safeguards under Art. 46 GDPR. Some data may be transferred outside the EU by external processors in the course of services provided to the Controller. In such cases, transfers will comply with GDPR Chapter V safeguards: an adequacy decision by the European Commission, or in its absence, Standard Contractual Clauses approved by the Commission, plus any supplementary measures ensuring an EU-equivalent level of protection.

Copies of such safeguards or their location can be obtained by contacting the Controller at the contact details provided in this notice.

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#### 10. How long will the data be stored?

- Personal data: 10 years from the end of the contractual relationship, in line with contractual liability regulations
  - Promotional/marketing data: 2 years (with consent)
  - Special categories of data relating to stays (preferences, ID documents): for the duration of the stay
  - Telephone traffic data and IT access/use logs: 90 days from check-out
  - In case of legal disputes: for the entire duration of the dispute until appeal deadlines are exhausted
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#### 11. What rights are granted under EU law to protect personal data?

You may exercise the following rights with the Controller:

- **Access** (Art. 15 GDPR) – obtain confirmation whether personal data is being processed and access related information
- **Rectification** – request correction of inaccurate data and completion of incomplete data
- **Erasure** (“right to be forgotten”) – request deletion of personal data in cases provided by Art. 17 GDPR
- **Restriction** – request restriction of processing in cases provided by Art. 18 GDPR
- **Portability** – receive data in a structured, commonly used, machine-readable format (Art. 20 GDPR)
- **Objection** – object at any time to processing based on Art. 6.1.e or f GDPR (Art. 21 GDPR)
- **Not to be subject to automated decision-making**, including profiling, producing legal or similarly significant effects (except in cases under Art. 22.2 GDPR)
- **Lodge a complaint** with the Supervisory Authority (Italian Data Protection Authority – Garante per la protezione dei dati personali, Piazza Venezia 11, 00187 Rome, email: [garante@gpdp.it](mailto:garante@gpdp.it))

Requests may be made by PEC email to [frontemaresrl@arubapec.it](mailto:frontemaresrl@arubapec.it) or by registered mail to the Controller's office at Via Garibaldi 5, 19025 Portovenere (SP). Requests may also be addressed to the DPO (see point 2 above).

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**12. Can consent be withdrawn later?**

Whenever processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing carried out prior to withdrawal. Withdrawal can be exercised by PEC email ([frontemaresrl@arubapec.it](mailto:frontemaresrl@arubapec.it)) or registered mail to the Controller's office at Via Garibaldi 5, 19025 Portovenere (SP).

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**13. Is there any automated decision-making process?**

The Controller declares that no automated decision-making is in place.