

INFORMATION ON THE PROCESSING OF PERSONAL DATA
of the users visiting the websites of Aziende Alberghiere Bettoja Spa

Pursuant to Article 13 of the EU Regulation 2016/679

This page contains a description of the policies for managing the website in regard to processing the personal data of the users who visit the site and their privacy. This information is provided pursuant to article 13 of Italian Legislative Decree no. 196/2003 and GDPR 679/2016 – Laws concerning the Protection of Personal Data and the individuals who interact with the web services of Aziende Alberghiere Bettoja Spa, which is accessible by telematics means through the following web address:

<https://www.bettojahotels.it>

which corresponds to the home page of the official website of Hotels Mediterraneo, Atlantico and Massimo D’Azeglio, Via Cavour, 15, 18 e 23 – 00184 Rome, also available at web addresses:

<https://www.romehotelmediterraneo.it/>

<http://www.romehoteldazeglio.it/>

<https://www.romehotelatlantico.it/>

This informative note is provided only for the aforementioned website and not for other websites eventually accessed by the user through links.

THE “CONTROLLER”

Following access to this website, data pertaining to persons that are identified or identifiable may be processed. The “Data Controller” of the personal data collected following a visit to our website or any other data used for providing our services is Alberghiere Bettoja S.p.A., Via Cavour, 18 - 00184 Rome.

THE” DATA PROTECTION OFFICER”

The Data Protection Officer (DPO) is Mr. Massimo Bruno who can be contacted at: privacy@bettojahotels.it

PLACE WHERE DATA IS PROCESSED

Data processing pertaining to the web services of this website [physically hosted by data processor Amadeus/Travelclick (<https://www.amadeus-hospitality.com>) in a Extra EU server hosted in USA], is carried out at the aforementioned headquarters and said data is processed only by the technical personnel in charge of processing of the data processing office, or by eventual persons in charge of processing who are entrusted to process occasional maintenance operations.

The personal data obtained from the users who submit hotel booking requests or through informative material (informative notes, newsletters, registration, etc) is used only to carry out the services or assistance requested and is not transmitted to third parties, except in the following possible cases:

- Business partners of Aziende Alberghiere Bettoja Spa, or the booking provider Amadeus/Travelclick to whom Aziende Alberghiere Bettoja Spa transmits the data exclusively in order to avoid on-line bookings;
- Persons, companies or professional offices who lend assistance and consulting services to Aziende Alberghiere Bettoja Spa, Aziende Alberghiere Bettoja Spa concerning accounting, administrative, legal, financial and tax matters;
- Subjects who are authorized to have access;
- to the data by law or through requests by the authorities;

The credit card data used for booking will be automatically unavailable at the end of the stay.

CATEGORIES OF PROCESSED DATA

Navigational data

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties.

This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for

submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

These data are only used to extract anonymous statistical information on website use as well as to check its functioning; they are erased immediately after being processed. The data might be used to establish liability in case computer crimes are committed against the website; except for this circumstance, any data on web contacts is currently retained for no longer than seven days.

Data voluntarily provided by the user

Sending e-mail messages to the addresses mentioned on this website, which is done on the basis of a freely chosen, explicit, and voluntary option, entails acquisition of the sender's address, which is necessary in order to reply to any request, as well as of such additional personal data as is contained in the message(s).

Data will be retained only for registration request to send the newsletters or special offers and will not be disclosed to anyone.

Bookings

In the event of bookings made through the website, the user must provide his name, address, telephone number and information regarding the payment manners and credit card used. Aziende Alberghiere Bettoja Spa will use said information only to process the bookings and to send specific information, which is relevant to the confirmation of said, such as a receipt, the booking code and the conditions.

The information provided will not be used for marketing purposes and will not be sold, transmitted, given by contract or sent to third parties in any way, with the exception of our provider of on-line booking services, Amadeus/TravelClick only for online bookings purposes.

In any event, the administrator of the website guarantees the use of scrupulous procedures in order to protect the navigational data and the use of particular precautions to protect the data pertaining to the credit card, which is provided during on-line bookings.

Personal Data Processing Collected from Curriculum Vitae

Aziende Alberghiere Bettoja Spa accept Personal Curriculum Vitae of possible candidates both on paper and in an electronic format. Providing spontaneous and voluntary of the Curriculum Vitae data will be considered as implicitly informed consent by the data subjects for personal data processing contained, only following the purposes related to the selection of potential candidates.

The data processed for the purpose of selection of candidates are personal useful to search for the particular profile. In general, the nature of the data is normal, except in some cases where you may indicate any sensitive data necessary to identify the specific requirements of the regulations, such as specifying a particular protected class, the suitability for certain jobs and / or start-ups required, within the limits set by the General Authorisation of the Garante (Italian Supervisor Authority) no. 1 of December 15, 2016 (Published in the Official Gazette no. 303 of December 29, 2016);

The provision of data relating to the selection of candidates is required. Any refusal to provide such data makes it impossible to perform an orderly selection and the possible recruitment. The data in question will not be disclosed to anyone.

General Rules for providing the CV

Any CV received spontaneously, replying to a job advertisement, will be stored directly by person in charge of the processing in accordance with the safety guidelines of personal data adopted in compliance with the security measures ex Chapter IV, 2) of the GDPR. These will be printed only on the occasion of a meeting and a conversation with the data subject. After the interview, if the candidate is not selected, the CV will be retained for a maximum of 24 months and after will be deleted and / or destroyed.

To send Curriculum Vitae use only the following addresses: Aziende Alberghiere Bettoja Spa, Human Resources Dpt, Via Cavour, 18 - 00184 Rome.

PERIOD FOR DATA RETENTION - CRITERIA USED

According to the provisions set forth in art. 5 par. 1 lett. e) of the Regulation (EU) 2016/679, collected personal data shall be kept in a form which permits identification of data subjects for a period not exceeding the purposes for which the personal data were collected and subsequently processed.

Data retention periods depend on the purposes of the processing:

- purposes related to technical navigation data for the correct functioning of the website: retention only for the related session, after which the data are deleted;

- purpose of reply to info request/services supply request (up to 12 months for contact requests ; 10 years for administrative / accounting / financial documentation relating to the provision of a service);
- data collection for staff recruitment (up to 24 months);
- newsletter, marketing or promotional communications in general (up to 24 months - until withdrawal of consent);
- purpose of di administrative / accounting / financial management: 10 years as as required by law for the conservation of administrative / accounting / financial documentation.

COOKIES AND TRACKING TECHNOLOGIES USED

In this website we are applied cookies technologies for different purposes, including computer technology authentication or to monitor sessions, and to store specific technical information regarding the users that access to the web server provider, in compliance with Guidelines on cookies and other tracking tools adopted on the websites (10 June 2021) of the Italian Data Protection Authority and Guidelines of the European Data Protection Board (EDPB) of May 2020.

List of cookies used on this website

NAME	DATA SENT TO	TYPE	PURPOSE	CATEGORY	EXPIRY DATA	PROVIDER
__cf_bm	USA	HTTP	Used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website	Necessary	1 Day	bettojahotels.it
PHPSESSID	USA	HTTP	Preserves user session state across page requests	Necessary	Session	dynamic.travelclick-websolutions.com
test_cookie	USA	HTTP	Used to check if the user's browser supports cookies	Necessary	1 Day	doubleclick.net
_ga	USA	HTTP	Used by Google Analytics to distinguish users when collecting information about page visits. This cookie helps us to identify website areas to be improved and the _ga cookie does not allow us to identify user personally as no personal information or data is tracked	Statistics	2 Years	bettojahotels.it
ga#	USA	HTTP	Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit	Statistics	2 Years	bettojahotels.it
_gat	USA	HTTP	Used by Google Analytics to monitor requests rate toward their servers. This cookie helps us to identify website areas to be improved and the _gat cookie does not allow us to identify user personally as no personal information or data is tracked.	Statistics	1 Day	bettojahotels.it
_gid	USA	HTTP	Used to distinguish users. is used only to realise statistical analysis (through Google analytic service)	Statistics	1 Day	bettojahotels.it
_hjAbsoluteSessionInProgress	Regno Unito	HTTP	Used to count how many times a website has been visited by different visitors- this is done By assigning the visitor an ID, so the visitor does not get registered twice	Statistics	1 Day	bettojahotels.it

_hjFirstSeen	Regno Unito	HTTP	Used to determine if the visitor has visited the website before, or if it is a new visitor on the website.	Statistics	1 Day	bettojahotels.it
_hjIncludedInPageviewSample	Regno Unito	HTTP	Used to detect whether the user navigation and interactions are included in the website's data analytics	Statistics	1 Day	bettojahotels.it
_hjIncludedInSessionSample	Regno Unito	HTTP	Registers data on visitors' website - behaviour. This is used for internal analysis and website optimization.	Statistics	1 Day	bettojahotels.it
_hjRecordingLastActivity	Regno Unito	HTML	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes.	Statistics	1 Day	bettojahotels.it
hjSession#	Regno Unito	HTTP	Collects statistic son the visitor's visits to the website, such as the number of visits, average time spent on the website and what pages have been read	Statistics	1 Day	bettojahotels.it
hjSessionUser#	Regno Unito	HTTP	Collects statistics on the visitor's visits to the website, such as the number of visits, average time spent on The website and what pages have been read	Statistics	1 Year	bettojahotels.it
_hjTLDDTest	Regno Unito	HTTP	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator	Statistics	Session	bettojahotels.it
hjViewportId	USA	HTML	Sets a unique ID for the session. This allows the website to obtain data on visitor behaviour for statistical purposes	Statistics	Session	bettojahotels.it
_fbp	Paesi Bassi	HTTP	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers	Marketing	3 Months	bettojahotels.it
_gcl_au	USA	HTTP	Used by Google AdSense for experimenting with advertisement efficiency across websites using their services	Marketing	3 Months	bettojahotels.it
_hjRecordingEnabled	USA	HTML	Used to identify the visitor and optimize ad-relevance by collecting visitor data from multiple websites - this exchange of visitor data is normally provided by a third-party data-center or ad-exchange	Marketing	Session	bettojahotels.it
IDE	USA	HTTP	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking One of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user	Marketing	1 Year	doubleclick.net
pagead/1p-user-list/#	USA	PIXEL	Tracks if the user has shown interest in specific products or events across	Marketing	Session	google.com

			multiple websites and detect show the user navigates between sites. This is used for measurement of advertisement efforts and facilitates payment of referral-fees between websites			
tr	Paesi Bassi	PIXEL	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers	Marketing	Session	facebook.com
uid	USA	HTTP	Unique user ID that recognizes the user on returning visits	Marketing	100 Days	dynamic.travelclick-websolutions.com
four_pc_cache	USA	HTML	Unclassified	Unclassified	Session	bettojahotels.it
four_ref_cache	USA	HTML	Unclassified	Unclassified	Session	bettojahotels.it
tc_293512	USA	HTML	Unclassified	Unclassified	Persistent	bettojahotels.it

If you block or erase cookies, it may not be possible to reset previously specified preferences or customised settings, and our capacity to customize the user experience will be limited.

More information on the cookies adopted available in the Cookie Policy of this site web.

TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES

Personal data is not transferred to non-EU third countries, except for any cases described above where, in any case, the adoption of appropriate safeguards is ensured, in compliance with Chapter V of the GDPR.

For transfers to the USA or others extra EU countries, in the absence of an adequacy decision pursuant to Article 45(3), or of appropriate safeguards pursuant to Article 46, it takes place on the basis of:

- Google Advertising Cookie: data subject explicitly consent pursuant to artt. 6 a) and 49 1, a) GDPR by web banner for cookie consent management on this website. See also the Cookie Policy;
- Booking Data, Amadeus/Travelclick, by standard data protection clauses adopted by the EU Commission (pursuant to Article 46, 2c GDPR) according to commission implementing decision (EU) 2021/915 of 4 June 2021 for the transfer of personal data to third countries.

OPTIONAL DATA PROVISION

Subject to the specifications made with regard to navigation data, users are free to provide the personal data listed in the request forms of Azienda Alberghiere Bettoja Spa or referred to in contacting Bettoja Hotels in order to provide CV, to make on-line bookings or to request delivery of information materials and other communications. Failure to provide such data may entail the failure to be provided with the items requested.

PROCESSING ARRANGEMENTS

Personal data is processed with automated means for no longer than is necessary to achieve the purposes for which it has been collected. Specific security measures are implemented to prevent the data from being lost, used unlawfully and/or inappropriately, and accessed without authorisation.

DATA SUBJECTS' RIGHTS

Data subjects are entitled to obtain confirmation of the existence of personal data concerning them and be informed of their contents and origin, verify their accuracy, or else request that such data be supplemented, updated or rectified (Chapter III GDPR 679/2016), in particular, the right to obtain confirmation as to whether or not personal data concerning they exist and the logic applied to the processing, the right to ask for their integration, the right to object to their processing on legitimate ground, and the right to request rectification, updating, erasure (right to be forgotten) or blocking of data that have been processed unlawfully, the right to obtain a copy of the personal data being processed as well as the right to data portability, also by sending a written request to the following e-mail address: (privacy@bettojahotels.it). At the same address it is possible to contact the Data Protection Officer.

If a data subject considers that the processing of personal data relating to him or her as performed via this website infringes the Regulation, he or she has the right to lodge a complaint with the Garante pursuant to Article 77 of the Regulation, or else to bring a judicial proceeding against the Garante pursuant to Article 79 of the Regulation.