

## PRIVACY

Information on the website [www.hotelfedericopalermo.it](http://www.hotelfedericopalermo.it)

This Notice describes in a clear and complete the policies adopted by the Owner.

This page describes how to manage the site in relation to the processing of personal data of users who consult it. The treatment is always based on principles of lawfulness and fairness in compliance with all current regulations and appropriate security measures are adopted to protect the data.

This privacy policy is provided as a brief information pursuant to art. 13 GDPR 679/2016 European Regulation on privacy, as well as pursuant to the provision concerning cookies n. 229 of 8 May 2014, you want to inform visitors of the site about the use of the data entered and the cookies used by the site itself. The information is also provided pursuant to Recommendation no. 2/2001 adopted by the Working Group established by art. 29 of the directive n. 95/46 / EC. to those who interact with the web services of this site, for the protection of personal data, accessible electronically from the address: [www.hotelfedericopalermo.it](http://www.hotelfedericopalermo.it)

By using any of our services and / or accepting this Statement, for example in the context of registering for one of our services, you consent to the collection and use of Personal Information as described in this Privacy Statement.

We draw your attention to the fact that this Notice does not apply to the processing of personal information of third parties, such as airlines, car rental companies and other service providers, companies that organize or offer travel packages, business partners or corporate clients.

### 1) PERSONAL INFORMATION THAT WE COLLECT

The personal information we collect includes:

- Your name and surname, e-mail address, telephone number and address;
- Credit card details (type and number of card, name on card, expiration date and CVC code);
- Information about your stays, including arrival and departure dates, special requests and your preferences on services (preference on rooms, services or other);
- Information you provide about your marketing preferences or promotional offers;

- Collection at the property:

we collect additional personal information during registration / check-in at our hotel, including information required by local laws (purpose related to the fulfillment of legal obligations).

#### Organization of events at our hotel:

If you plan to organize an event with us, we will record the specifications of the event or meeting, the date, number of guests, details about guest rooms and, for company events, information about your organization (name, budget annual number of events sponsored each year). We also collect information about guests who are part of your group or event. If you visit us in a group, we can request your personal information from the group and we can send you commercial information upon your express consent following your stay with a group or participation in an event. If you visit us as part of an event, we can share your personal

information with the event organizers. If you're an event planner, we can also share information about your event with third-party service providers who can send you commercial information about event services.

### **Information we collect from third parties**

We may also collect information about you from third parties, including information from our partners (travel agencies, airlines, payment cards) and other partners; from social media services in line with your settings on these services.

### **Information we collect automatically**

When you use our site, we automatically collect information, some of which may be personal data. For example: language settings, IP address, location, device settings, device operating system, log-in information, usage time, requested URL, status report, user agent (such as browser version information), browsing history, type of information viewed. We may also collect data automatically through cookies. The data could also be used to ascertain responsibility in case of hypothetical computer crimes against the site.

## **2) PURPOSE OF TREATMENT, LEGAL BASIS AND LICENSE OF TREATMENT**

The processing of data has the following purposes:

- a) management of relations with customers (management of reservations, issue of invoices, estimates), to perform any contractual obligations;
- b) comply with regulatory obligations, in particular accounting and tax obligations;
- c) management of litigation;

### **2a) Inherent to the service:**

- sending (with your written consent) promotional offers on our services and updates on rates and offers, as well as greetings by ordinary mail or by fax or email;
- to execute (subject to your written consent) to hotel services such as external communication of data relating to your stay for the sole purpose of allowing the function of receiving objects, messages and phone calls addressed to you.
- to process, (with prior written consent), the so-called data sensitive by you voluntarily transmitted in order to offer a better level of hospitality at our hotel.

We can use your e-mail address to send you, with your written consent, our newsletters, our offers or our best wishes for the holidays.

- For the purposes indicated in point 2 lett. a) we rely on the execution of a contract: the use of your data may be necessary to implement the contract you have with us. For example, if you use our services to make an online reservation, we will use your data to perform our obligation to complete and manage the booking, by virtue of the contract between us.
- For the purposes in point 2 lett. b) and c), we rely on legitimate interests: we use your information for our legitimate interests, use your information for administrative, legal or fraud detection purposes. When we use personal data for our legitimate interests, we will always balance your rights and interests with regard to the protection of your personal data with our rights and interests.

- As regards the purpose in point 2 lett. c), we also base ourselves, where possible, on our obligation to respect the current legislation.
- With regard to the purposes indicated in point 2a) according to current legislation, we will ask your consent for the purposes indicated in them before processing your personal information that you can remove at any time by contacting us at the addresses mentioned at the end of this statement .

### **3) Identity and contact data**

This site is managed by the Data Controller, identified in the person of the owner and legal representative p.t. of the company Excellence Srl, Via Principe di Granatelli 60 – 90139 Palermo (PA), e-mail: [info@hotelfedericopalermo.it](mailto:info@hotelfedericopalermo.it)

The Data Controller guarantees the security, confidentiality and protection of which they are in possession, at any stage of the processing of the same. The collected data are used in compliance with the current legislation on privacy (GDPR 679/2016). Responsible for data protection is Idnet Management srls - Contact person Dr. Alfredo Giangrande [giangrande.alfredo@gmail.com](mailto:giangrande.alfredo@gmail.com)

### **4) Place of treatment**

The processing operations connected to the web services of this site take place at the headquarters of the Data Controller and are only handled by authorized processing personnel and by the provider responsible for Internet services and hosting / housing of this site. In addition, these treatments are handled exclusively by technical staff of the Office in charge of processing, or by persons in charge of occasional maintenance operations under the strict control of the Data Controller.

### **5) NATURE OF DATA SUPPLY**

For the purposes referred to in point 2) in case of reservation or confirmation for a hotel stay, the provision of data is compulsory and failure to provide it may make it impossible to obtain what has been requested. For the purposes referred to in point 2a) the provision of data is optional and does not prevent the provision of the requested service (hotel stay)

### **6) REFUSAL TO PROVIDE DATA**

The interested party can refuse to give the Owner his navigation data. To do this, it must disable by following the instructions provided by the browser in use. Disabling cookies can make navigation of the site's features worse

### **7) DATA ADDRESSEES**

The data object of the treatment will not be diffused, sold or exchanged with third parties without the consent expressed by the interested party. The scope of communication of the data is limited exclusively to the subjects competent for the fulfillment of the contractual operations and the observance of legal obligations. They may therefore be disclosed to third parties belonging to the following categories who will process the data as external processors: • subjects who provide services for the management of the

information system; • studies or companies in the context of assistance and consultancy relationships; • Administrations, public bodies and competent authorities, for the fulfillment of obligations of laws and / or provisions of public bodies; • Group companies and / or the network of companies or private parties directly involved in the performance of the service or entitled to know the data according to the law. In any case, only the data necessary and relevant to the purposes of the processing to which they are responsible will be disclosed to the aforementioned persons.

## 8) OPTIONAL OPTIONALITY

Apart from that specified for navigation data, the user is free to provide personal data contained in the forms on the website (web form) or to request the sending of newsletters, informative material, commercial offers or other communications. Failure to provide such data may make it impossible to obtain what has been requested.

## 9) DATA SHARING

- Booking.com: We work with Booking.com B.V., with headquarters in Herengracht 597, 1017 CE Amsterdam, the Netherlands ([www.booking.com](http://www.booking.com)) (hereinafter Booking.com) to offer you an online booking service. We provide the contents of the site and reservations are made with us, while the management of the reservations themselves is borne by Booking.com. The information you enter on this site will then be shared with Booking.com and its affiliates and may include your name, your contacts, payment details, the name of guests traveling with you and any preferences expressed during the booking .

Booking.com will send you a booking confirmation, an e-mail before your arrival and information about the area and our structure. Booking.com also provides international customer support from its offices every day, 24 hours a day, in more than 20 languages. Sharing your data with Booking.com's global customer support will enable it to respond to you if you need help. Booking.com may use your information for technical, analytical and marketing purposes as described in the Booking.com Privacy Statement. For this reason, your information may also be shared with other companies that are part of Booking Holdings Inc. for analysis purposes, to provide offers regarding the travel world that may interest you and to provide you with personalized service. If required by law,

Booking.com will ask for your consent. If your data is transferred to a country outside the European economic area, Booking.com will make contractual arrangements to ensure that your personal information is protected under European law. If you have any questions regarding the processing of your personal data by Booking.com, please contact the [dataprotectionoffice@booking.com](mailto:dataprotectionoffice@booking.com) address

- Other service providers: we use service companies to manage your information on our behalf. This management serves for the purposes described in this statement, for example the management of booking payments and the sending of marketing material for analytical support purposes. These service providers are required to maintain confidentiality agreements and do not have permission to use your personal data for other purposes.

- Competent authorities: we share personal data with law enforcement and other government authorities when required by law or if absolutely necessary for the identification, prevention or conduct of legal proceedings against fraud or offenses.

## **10) SAFETY**

EXCELLENCE s.r.l., HOTEL FEDERICO II CENTRAL PALACE, has set up suitable procedures to prevent unauthorized access to data, in addition to their improper use, to safeguard the personal data you provide us. We also rely on security procedures and technical and physical restrictions to prevent access to and use of personal data contained on our servers. Only authorized personnel can access personal data while carrying out their work.

## **11) DATA CONSERVATION**

We will keep your personal data for the period of time necessary to provide the service, in compliance with the laws in force, in order to handle any disputes with any third party and in any case for the time necessary for the completion of our activities, including the detection and protection of fraud or other illegal activity. All personal information stored will be subject to the provisions of this Privacy Policy. If you have questions about specific data retention periods, contact us using the contact details indicated in this statement.

## **12) DATA TRANSFER**

The Data Controller does not transfer personal data to third countries or to international organizations.

## **13) REVOCATION OF CONSENT**

With reference to the art.23 of the D.Lgs. 196/2003 and to the art. 6 of the GDPR 679/16, the interested party can withdraw the consent at any time.

## **14) RIGHTS OF THE INTERESTED**

We want you to have control of how we use your personal information. You can do it in the following ways:

- you can ask us for a copy of your personal data in our possession;
- you can inform us of any changes to your personal data or you can ask us to correct any of your information in our possession;
- in specific situations, you can ask us to cancel, block or limit the processing of your personal data in our possession, or oppose to particular ways in which we are using your personal information;
- in specific situations, you can also ask us to send your personal information in our possession to a third party.

Where we use your personal information with your consent, you may ask us to withdraw this consent at any time and in the manner provided for by applicable law. Furthermore, where we process your personal data on the basis of legitimate interests or the public interest, you have the right to object at any time to the use of your personal information, in accordance with the procedures established by law. We rely on you to ensure that your personal information is complete, accurate and up-to-date. Inform us promptly of any changes or inaccuracies in your personal information by contacting: [info@hotelfedericopalermo.it](mailto:info@hotelfedericopalermo.it)

We will manage your request according to the current legislation.

*The interested party exercises his / her rights described above with reference to the GDPR 679/2016 ex art. 15 "right of access", art. 16 "right of rectification", art. 17 "right to cancellation", art. 18 "right to limitation of treatment", art. 20 "right to portability", art.21 "right to oppose the automated decision-making process of GDPR 679/2016, by writing to the Data Controller at the following address: Excellence SRL Via Principe di Granatelli 60 -90139 Palermo: [info@hotelfedericopalermo.it](mailto:info@hotelfedericopalermo.it)*

## **15) PROPOSITION OF THE COMPLAINT**

The interested party has the right to lodge a complaint with the supervisory authority of the State of residence

## **PRIVACY POLICY ON COOKIES**

### **1) Definition of cookies**

Cookies are small text files that are sent to your computer.

The site in question uses the following types of cookies:

### **2) Technical session cookies**

The use of session cookies is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) necessary for the safe and efficient exploration of the site. I c.d. session cookies used on this site avoid the use of other technologies that could compromise the privacy of users' browsing and do not allow the acquisition of personal identification data. These cookies are processed in computer mode.

### **3) Additional technical cookies**

The operation of the site uses some technical cookies: - consent cookies. It is the one related to the cookie that is inserted to register consent to the use of analytics and / or profiling cookies. It is also free to delete the cookie from your computer.

- additional technical cookies. There are additional technical cookies essential for the proper functioning of the website. These cookies allow us to provide the services requested by users and to browse the site using its best performance. This type of cookie can not be disabled as it is necessary for the proper functioning of the site.

### **Analytics cookies**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files that are stored on your computer to allow the website to analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google (independent data controller) will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating

to website activity and use of the Internet. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You can refuse to use cookies by selecting the appropriate settings on your browser, but this may prevent you from using all the features of this website.

Cookies on this site are processed in computer mode

### **How to disable cookies**

#### **Chrome**

Click on the icon at the top right "Customize and control Google Chrome" - Click "History" - Click "Clear browsing data ..." - Select the option "Cookies and other site and plug-in data" - Click "Cancel navigation data "

#### **Mozilla Firefox**

Click "History" - Click "Cancel the recent history ..." - Select the "Cookie" option - Click "Cancel now"

#### **Internet Explorer**

Click "Tools" - Click "Internet Options" In the "General" tab - click "Delete ..." Select "Cookies" - Click "Delete"

#### **Safari**

Click "Preferences" - Click "Privacy" - Click "Remove all website data ..." and confirm

### **How to surf anonymously without cookies**

Google Chrome: Click on the icon in the upper right corner "Customize and control Google Chrome" Click "New window in incognito" Mozilla Firefox: Click on the icon on the top right "Open menu" Click "Anonymous window" Internet Explorer: Click "Security" Click "InPrivate Browsing" Safari Click "File" Click "New Private Window"

## **16) INFORMATION NOT CONTAINED IN THIS POLICY**

More information in relation to the processing of Personal Data may be requested at any time to the Data Controller using the contact information.

## **17) CHANGES TO THIS PRIVACY POLICY**

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to Users on this page. Please therefore consult this page often, referring to the date of the last modification indicated at the bottom. In case of non-acceptance of the changes made to this privacy policy, the User is required to cease using this Application and may request the Data Controller to remove his Personal Data, unless otherwise specified.

## **18) INFORMATION ON THIS PRIVACY POLICY**

The Data Controller is responsible for this privacy policy.

### **19) PRIVACY OF MINORS**

Our website is aimed at a general public and does not offer services for children. If we discover that a minor has provided us with personal data without the permission of the parents or guardian, we will immediately delete this information.

External links. If the pages of this website or the sections of our applications contain links to other sites, they are not bound by this Privacy Policy. We advise you to read carefully the privacy policy available on these external sites and to examine the procedures for the collection, use and disclosure of personal information used by them.

### **20) DEFENSE IN JUDGMENT**

The User's Personal Data may be used for the defense by the Owner in court or in the stages leading to its eventual establishment, by abuses in the use of the same or related services by the User. Following a court summons, judicial order or other legal initiative; in order to establish or exercise the rights granted to us by law; to defend ourselves in the eventuality of legal action against us or for other purposes dictated by law.

The User declares to be aware that the Data Controller may be asked to disclose the data at the request of the public authorities.

### **21) LEGAL REFERENCES**

This information is prepared in fulfillment of the obligations provided for by Legislative Decree no. 196/2003 and GDPR 679/16 by art. 10 of the Directive n. 95/46 / EC, as well as the provisions of Directive 2009/136 / EC concerning Cookies.