

PERSONAL DATA PROCESSING POLICY FOR COMMERCIAL PURPOSES

GUN_InfC_Comm_01_Ed.: 15/06/2026

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 – General Data Protection Regulation (hereinafter the “**Regulation**”), we hereby inform you that, after giving your free and optional consent, Gruppo UNA S.p.A., in its capacity as Data Controller, will process certain personal data relating to you for the purposes of promotional and commercial communications.

Who will process the personal data?

The data controller of your personal data is **Gruppo UNA S.p.A.** (www.unaitalianhospitality.com), with headquarters in **Milan, Via Gioacchino Murat, 23** (hereinafter, also, the “**Company**”).

What personal data will we process?

The following categories of personal data will be processed (hereinafter referred to as the “**Data**” or “**your Data**”):

- a) personal information (e.g., first name, last name, tax code, address, date and place of birth, nationality);
- b) contact details (telephone/mobile number, email address);
- c) data on loyalty customer preferences (e.g., preferences expressed – destinations, type of stay, services – or inferred);
- d) data relating to stays (e.g., dates, duration, hotel, type of room), services used (e.g., restaurant, spa, ancillary services) and loyalty customer transactions (e.g., amounts spent, use of gift cards and vouchers);
- e) data relating to the loyalty programme for loyalty customers (points earned, used or transferred, rewards redeemed, membership level, activity history within the programme).

Why do we process the Data?

Your Data may be processed for the purposes and on the basis of the legal grounds indicated below:

- **(F1) - Sending of commercial communications by the Company:** the processing of data involves the Company sending commercial communications, including targeted ones, relating to the services and/or products of Gruppo UNA S.p.A., and, where applicable, of other Gruppo Unipol companies, or of third party companies¹, in particular, newsletters and/or promotional and advertising material, and the performance of direct sales activities and market research, including surveys on the quality of and satisfaction with services, using remote communication methods, including automated means of contact (such as SMS, MMS, fax, email, messages on web applications and Social Networks) and traditional means (such as regular mail and telephone calls with an operator).
- **(F2) - Automated analysis of Data in order to infer the data subject's tastes and purchasing preferences (hereinafter, “Profiling”):** Data processing consists of analysing Data, including using electronic or automated means, in order to identify your needs and preferences and the services and products that may be of interest to you.

#	Categories of Data	Legal basis	Providing the Data
F1	a); b); d); e);	Consent	The provision of your data and your consent are optional , and if not provided, the existing relationships and services provided by the Company are not affected.
F2	a); b); c); d); e);	Consent	The provision of your data and your consent are optional , and if not provided, the existing relationships and services provided by the Company are not affected.

How do we process your Data?

Your data will not be made public. The processing will be carried out using procedures and methods, including computerised methods, relevant to the purposes pursued. Your data may be disclosed, within our company organisations, to staff authorised to carry out processing operations and trained in this regard, as well as to third party companies, internal or external to Gruppo Unipol, designated as data processors, who are entrusted with the execution, on our behalf, of certain technical and organisational operations strictly necessary for the performance of the aforementioned activities, as well as to companies specialised in information and commercial promotion services, market research and surveys on the quality of services and customer satisfaction.

¹ A complete, updated list of all the companies that are part of Gruppo Unipol is available at www.unipol.com

Your data will be stored in full compliance with the security measures required by privacy legislation (considered adequate to avoid compromising the confidentiality, integrity and availability of data).

Who will we disclose the Data to?

The Data will not be distributed but may be disclosed to third parties, where strictly necessary, solely for the purposes set out above. In particular, the Data may be disclosed to:

- third-party companies (for example, companies providing commercial and/or promotional services), who perform certain activities on our behalf and with whom we have agreements governing the processing of personal data.

Your Data will not be transferred to countries outside the European Union or the European Economic Area; if this is necessary to fulfil the aforementioned purposes, we will do so on the basis of the safeguards provided for in the Regulation, such as a European Commission adequacy decision, or the signing of standard contractual clauses with the Data importer.

How long will we process the Data for?

Your Data will be retained for the time strictly necessary to pursue the purposes indicated above. Once this period has elapsed, it will no longer be used for the aforementioned purposes.

In detail:

Purpose	Retention time
F1	For two (2) years from the time consent is given, or until consent is withdrawn, whichever is earlier
F2	For one (1) year from the time consent is given, or until consent is withdrawn, whichever is earlier

Your rights

Privacy legislation (Articles 15 to 22 of the Regulation) guarantees you the right to access your Data at all times, to have it corrected and/or supplemented, if inaccurate or incomplete, deleted if it is processed unlawfully, and the portability of the data that you have provided to us, if processed automatically on the basis of your consent or for the contractual services you have requested, within the limits of the provisions of the Regulation (Article 20).

Privacy legislation also gives you the right to request the restriction of the processing of data, if the conditions are met, and to object to the processing on grounds relating to your particular situation.

You are reminded that you have the right to withdraw any consent you have given at any time; withdrawal of consent does not affect the lawfulness of processing carried out before consent is withdrawn.

The Data Protection Officer is available if you require any clarification about the processing of your Data and if you wish to exercise your rights: you can contact them at privacy@gruppouna.it.

Your right to contact the Italian Data Protection Authority, including by lodging a complaint, remains unaffected, if you deem it necessary to protect your Data and your rights.

STATEMENT OF CONSENT TO THE PROCESSING OF PERSONAL DATA FOR COMMERCIAL COMMUNICATIONS

- Having read the contents of the personal data processing policy, I consent to the processing of my personal data by Gruppo UNA S.p.A. in order to send commercial messages relating to the services and/or products of Gruppo UNA S.p.A., and, where applicable, of other Gruppo Unipol companies, or of third party companies, in particular, newsletters and/or promotional and advertising material, and in order to carry out direct sales activities and market research, including surveys on the quality of and satisfaction with services, using remote communication methods, including automated means of contact (such as SMS, MMS, fax, automated telephone calls, email, messages on web applications and Social Networks) and traditional means (such as regular mail and telephone calls with an operator). ²
- 2) Having read the contents of the personal data processing policy, I consent to the processing of my personal data by Gruppo UNA S.p.A. for the purposes of analysing data and information acquired at the beginning of and during the course

² A complete, updated list of all the companies that are part of Gruppo Unipol is available at www.unipol.com

of relations with the company, in order to identify, including via electronic data processing, my preferences and services and products that may be of interest to me.