

PERSONAL DATA PROCESSING POLICY FOR COMMERCIAL PURPOSES

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

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);
- b) contact details (telephone/mobile number, email address);
- c) 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);
- d) 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) – Enrolment in the loyalty programme (“Loyalty”):** data processing takes place in order to allow you to join and participate in the Loyalty programme, in accordance with the methods described in the relevant contractual regulations. Enrolment in the Loyalty programme involves creating a reserved area online (the “**Reserved Area**”), where you can see your points history and other information regarding your status in the programme. Your contact details may be used to send service communications related to the Loyalty programme;
- **(F2) - Fulfilment of administrative and accounting requirements:** processing takes place for the purpose of fulfilling administrative and accounting requirements.

#	Categories of Data	Legal basis	Providing the Data
F1	a); b); c); d)	Performance of a contract to which the data subject is party	The provision of your data is essential to achieve the purpose; if you do not provide it, you will not be able to join the Loyalty programme.
F2	a);	The legal basis for processing is the need to comply with the legal requirements applicable from time to time	It is necessary to provide your Data to fulfil the stated purpose; if not provided, we will not be able to comply with any legal obligations applicable from time to time and we may not be able to provide you with the Services requested

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.

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 the duration of the contractual relationship and until its termination
F2	For ten (10) years from the last accounting entry

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, 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.

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 ACKNOWLEDGEMENT OF THE PERSONAL DATA PROCESSING POLICY

- I confirm that I have read the contents of the privacy policy regarding the processing of personal data carried out by Gruppo UNA S.p.A., acting as data controller, and the purposes indicated therein.