

**INFORMATION PURSUANT TO ART. 13 OF THE EUROPEAN REGULATION 2016/679
ON THE PROCESSING OF PERSONAL DATA
(HOTEL CUSTOMERS)**

Cava s.p.a with registered office in Via Italo Mus - 11027 Saint Vincent (AO), in the person of the pro tempore legal representative as Data controller, informs, pursuant to art. 13 and ss Reg. EU 679/2016 (hereinafter referred to as GDPR), that personal data, including specific, voluntarily provided, will be subject to treatment based on the principles of correctness, lawfulness, transparency, protection of confidentiality and rights, in full compliance with current legislation on the protection of personal data.

Contact details	Data protection officer data (DPO/RPD)	Contacts
CAVA s.p.A Via Italo Mus 11027 Saint-Vincent (AO)	The Owner, pursuant to art. 37 of the European Regulation 679/2016, designated the Data Protection Officer	Regulatory Compliance Office is contactable, for purposes of exercise of rights pursuant art. 15 of Reg. Ue 2016/679, to the following e-mail address: generale@svrc.it . The DPO can be contacted at the following e-mail address dpo@svrc.it

A. Purpose of processing and legal basis

The processing of data, in accordance with the provisions of art. 6 paragraph 1 lett. b), c) and f) GDPR, is aimed at carrying out the contractual relationship established with the Data Controller, as well as to the pursuit of its legitimate interest. Please note that the processing will take place for the following purposes:

PURPOSE			DESCRIPTION	REDEMPTION PERIOD/CRITERIA
1	Mandatory	Administrative	User registration with scanning the identity document as per D.Lgs. 90/2017, on public security and recycling	10 Years
1	Mandatory	Safety	Registration of the user image for video surveillance	7 days from last entry unless a dispute is initiated
2	Optional	Direct Marketing	Sending of newsletters to communicate promotions and offers by the gambling house and hotel	Until the purposes are exhausted or the revocation by the person concerned
2	Optional	Communication to third parties for marketing purposes	Sending of newsletters to communicate promotions and offers dedicated by third partners	Until the purposes are exhausted or the revocation by the person concerned
2	Optional	Requests for personalized processing	Management of specific requests, related to food, religious or medical needs	Until the purposes are exhausted or the revocation by the person concerned

B. Methods of data processing

The personal data provided will be processed by the Data Controller also in outsourcing (outsourcing the management of the processing), in an automated way or by means of paper, through the organization and processing of data, related to the purposes provided for in the previous point, and provided with guarantees of data security and confidentiality, in compliance with the appropriate technical and organisational measures pursuant to art. 32 of Reg.Ue 2016/679.

The personal data acquired for the purposes indicated above will be processed for the time necessary for the pursuit of the purposes provided by point A. After this period the data will be deleted and/ or destroyed or may be stored anonymously for mere statistical purposes, as required by current legislation. Each year, following the communication of the e-mail communicated at the registration, you will be asked to update your data in order to properly store the data held by the company.

C. Nature of data provision

With reference to the purposes highlighted in paragraph A points 1, the provision of your personal data is mandatory to register at the hotel and use the attached services. The partial or incorrect failure to provide the same could constitute a prohibition of access to the same.

With reference to the purposes highlighted in paragraph A points 2, the provision of your personal data is optional.

D. Third parties to whom data may be communicated

The personal data provided will not be disseminated, but may be disclosed to public, institutional or professional by law, and specifically:

Categories of third parties to whom the data may be disclosed or part of the data
Public Authorities - Revenue Agency - Police Headquarters- Police Authority - Judicial Authorities - Autonomous Region of Valle d'Aosta

E. Rights of data subjects

At any time you can exercise your rights against the Data Controller.

Pursuant to Articles 15 and ss of Reg. EU 2016/679 you are entitled to:

RIGHTS
a) obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet recorded, and their communication in the form of intelligible;
b) obtain the indication of the origin of personal data, the purposes and methods of processing, the logic applied in the case of processing carried out with the help of electronic tools, the identification details of the owner, the managers and the representative designated pursuant to of the persons or categories of persons to whom personal data may be disclosed or which may be disclosed knowledge as a designated representative in the territory of the State, responsible persons or persons in charge
c) obtain the updating, correction or, where it is of interest to you, integration of the data;
d) obtain the deletion of data in the cases provided for by art. 17 Reg. EU 2016/679, the transformation into anonymous form or the blocking of the data processed in violation of law, including those whose storage is not necessary in relation to the purposes for which the data were collected; or subsequently processed; The Data Controller, following the request for cancellation of the data subject and upon his specific request, will communicate to any Data Controller who is processing your personal data of the request of the data subject to delete any link, copy or reproduction, on paper and/or electronically, of your personal data, except where such fulfilment is impossible or involves the use of means manifestly disproportionate to the protected right; or, where it is of interest to you, the integration of the data and the request for cancellation have been brought to the attention of the concerns the content of the data, to whom the data have been communicated or disseminated, except where such compliance is impossible or involves the use of means manifestly disproportionate to the protected right
e) obtain the limitation of processing in the cases provided for by art. 18 Reg. EU 2016/679;
f) receive in structured, commonly used and machine-readable format the personal reference data provided by the Data Controller processing and/or by a Data Processor and the right to transmit them (right to portability), by Cava s.p.a., to another Holder, where technically possible;
g) to oppose, in whole or in part for legitimate reasons, the processing of personal data concerning him, even if they are relevant to the purpose of collection;
h) right to data portability
i) to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it)

F. Procedures for the exercise of rights by data subjects

You may at any time exercise your rights by sending:

- Registered letter of receipt to Cava s.p.a with registered office in Via Italo Mus - 11027 Saint Vincent (AO)
- PEC: cdlv-dg@legalmail.it

The rights listed above may, at any time, be exercised by sending an email request to generale@svrc.it

G. Particular categories of data ex "sensitive data"

It should also be noted that during the processing operations described above, CAVA spa may become aware of data that the European Reg. 679/2016 defines particular categories of data (personal data that reveal racial or ethnic origin, political opinions, the religious or philosophical beliefs, or union membership, as well as processing genetic data, biometric data intended to identify in an unique way to a natural person, data relating to the health or sexual life or sexual orientation of the person).

H. Video surveillance equipment for security purposes

It is also announced that following the registration the interested party will also be identifiable through video surveillance systems present in the hotel. These registrations are made and managed in full compliance with applicable regulations.

The updated list of Data Processors and data processors is kept at the registered office of the Data Controller.