BZAR HOTELS

Marketing Area Data Processing Notice

The operational area related to marketing activities is fundamental to any business enterprise.
In compliance **with EU Regulation 679/2016 (GDPR),** as well as **Legislative Decree 101/2018,** which amends **Legislative Decree 196/2003 (Privacy Code)** concerning the protection of individuals with regard to the processing of personal data, as Data Controller, hereby informs you—pursuant to Articles 12, 13, and 14 of the Regulation—that it is required to provide information regarding the use of personal data and will process such data in accordance with the rights and fundamental freedoms of individuals, following the purposes and methods outlined in the Regulation.

This notice is therefore intended to inform the data subject of the identity of the entity processing the data, the potential necessity of providing personal data for service delivery and communication management, as well as the methods for exercising privacy rights.

Purpose of Data Processing

Data is processed as part of the Company's normal operations, and for the purposes defined under Article 6(1)(b) of the Regulation, specifically:

- **Direct marketing**, for activities aimed at promoting the Controller's services or those of third-party companies through the periodic sending of letters, mailing lists, newsletters, social media messages, and informational materials containing commercial information regarding already acquired or new products/services, and market research.

- **Sending communications** related to organized activities such as surveys, webinars, conferences, events, and participation management.

If the Controller intends to process the data for a purpose other than that for which it was collected, the data subject will be informed in advance and, where required, consent will be obtained.

Type of Data Processed and Legal Basis

The sending of communications related to Hotel Garden - Co-Hotel Sicilia products or services is based on the **freely and explicitly given consent** of the data subject.

Personal data processed by the Controller may include, by way of example, **identification data** (e.g., first and last name) and **contact details**.

Consent is not mandatory for all purposes and, if provided, **may be revoked at any time** by the data subject.

If you no longer wish to receive such communications, you may stop receiving them at any time (see **Article 8 – Right to Object to Processing**).

Data Retention

Personal data will be retained **no longer than necessary** to achieve the purposes for which it was collected and, in any case, for the period strictly required by applicable national or international laws, or the laws of countries to which the data may be transferred. Data will be stored for a shorter period if consent is revoked by the data subject.

We also inform you that no **automated decision-making processes** will be used in processing personal data.

Data Processing Methods

Personal data is processed using **manual, computer, and telematic tools**, in a manner closely related to the stated purposes and in any case ensuring data security and confidentiality. Documentation is archived electronically.

Key information:

- Personal data collection is limited to the minimum necessary for each specific processing purpose.
- Personal data is processed only for the purposes for which it was collected.
- Data retention is limited to the minimum necessary.
- Personal data is not shared with third-party marketers.
- Personal data is neither sold nor rented.

Data Provision, Communication, and Disclosure

Personal data collected by the Company may be communicated, **strictly within the limits of the above-stated purposes**, to the following entities or categories:

- Parties, to the extent of their competence, including public or private bodies where there is a legal obligation or legitimate basis for communication.

- Entities assisting in organizing marketing and communication activities, both in content design (e.g., graphic design) and in execution, as well as other professionals or companies cooperating with the Company for marketing purposes.

- Legal consultants assisting the Company in resolving legal matters.

- Third parties where communication is necessary for fulfilling contractual obligations or legal requirements.

Personal data **will not be disclosed** to undetermined third parties through distribution or public consultation.

For data not collected directly from the data subject, this notice will be provided (even electronically) at the time of registration or at the latest upon first communication. All data will be processed in accordance with the law and in line with the Company's longstanding commitment to confidentiality.

Communication to Third Parties

Data will not be publicly disclosed. They may be processed by **technology, IT, or consulting service providers**, who usually act as data processors. Data will be handled in compliance with the principle of **data minimization**, prioritizing anonymous or anonymized data whenever possible.

In particular, the categories of recipients may include:

- **Independent data controllers**, such as public authorities or law enforcement agencies, when required by law and within the scope of their duties.

- **BZAR hotels** group

International Data Transfers

Data is processed within the **EU**. Should a transfer outside the EU become necessary, it will be conducted using the appropriate safeguards under the **GDPR**, such as **EU adequacy decisions** or **Standard Contractual Clauses** issued by the European Commission, possibly supplemented with additional measures as recommended by the **EDPB** (European Data Protection Board).

Data Subject Rights

As a data subject, you may exercise your rights under the GDPR at any time by sending a written request to:
dpo@hideea.com

The data subject may assert the following rights under Articles 15–22 of the GDPR:

- **Right of access:** to confirm whether data is being processed and obtain details about the source, purposes, categories of data, recipients, etc.

- **Right to rectification:** to correct inaccurate or incomplete personal data.

- **Right to erasure:** to have personal data deleted without undue delay where:

    - the data is no longer necessary;
    - consent is withdrawn and no other legal basis exists;
    - the data has been unlawfully processed;

    - erasure is required by law.

- **Right to object:** to object at any time to processing based on the Controller's legitimate interest.

- **Right to restriction:** to request restriction of processing in cases such as:

    - the accuracy of data is contested (for the time needed for verification),
    - the processing is unlawful and the data subject opposes erasure,
    - the data is needed for legal claims,
    - a pending objection requires the balancing of legitimate interests.

- **Right to data portability:** to receive personal data in a structured, commonly used, machine-readable format and to transmit it to another controller (when processing is based on consent or contract and done electronically).

- **Right not to be subject to automated decisions:** to not be subject to decisions based solely on automated processing (including profiling) that produce legal or similarly significant effects, unless necessary for a contract or based on consent.

- **Right to lodge a complaint with a supervisory authority:** without prejudice to other administrative or legal remedies, if you believe your data is being processed in violation of the GDPR.

Data Controller, Data Processors, and Authorized Personnel

The Data Controller is:

BZAR hotels– CITY HUB HOLDING S.R.L.

Your personal data will be processed only by personnel authorized by the Controller. You may request a complete and updated list of appointed data processors by contacting the Controller.