

PRIVACY POLICY

Dear User,

on this page you will find information on how we handle your personal data through our website. We are providing this information not only to comply with our legal obligations regarding the protection of personal data as set out in Regulation (EU) 2016/679 or the "Regulation", but also because we believe that the protection of personal data is a fundamental value of our business activity and we want to provide you with any information that may help you to protect your privacy and to control the use that is made of your data in relation to your browsing experience on our site.

1. DATA CONTROLLER AND CONTACTS

The Data Controller is the person who makes the decisions on the methods and purposes of processing.

The Data Controller is Xenia Hotellerie Solution S.p.A. Società Benefit, with registered office in Guardigliare (CH), via Antonio Gramsci, n. 79, VAT No. and Taxpayer Code 01691390692. For any question concerning the processing of your personal data, you may contact the Data Controller by ordinary mail at the above addresses or by writing to the email address privacy@xeniahs.com.

Xenia S.p.A. SB has not appointed a DPO (Data Protection Officer).

2. PURPOSE OF PROCESSING, DATA PROCESSED, LEGAL BASIS, MANDATORY PROVISION OF DATA, STORAGE PERIOD

A purpose is a reason for which we process your personal data. Below is a list of our purposes. Each and every purpose has one or more legal bases.

a) Viewing and browsing the website

Purpose: to allow correct navigation on the website and, in the event of computer crime, to ascertain possible liability.

Data processed: IP addresses, domain names, URIs and navigation data. These data are acquired by the computer systems responsible for the operation of this website.

Legal basis: data are processed on the basis of the need to provide users with the necessary tools to visit the website and access the functions made available. The legal basis is that provided for in Article 6, par.2, lett.f of the GDPR: the **legitimate interest of the Data Controller** (consisting in ensuring the proper functioning of the IT systems and in investigating possible offences - possibly also on the basis of the existence of a legal obligation).

Obligatory nature of the provision of data: the provision of data is left to your will, but it is indispensable in order to visit the website and access its various functions.

Notes on processing and storage time: displaying the website and navigating within it involve, for reasons inherent to the use of computer

protocols, an exchange of technical information between the Data Controller's computer system and that of the user. The information transmitted is, for example, the following: operating system used, browser and its version, time of the request, size of the information flow.

b) Site Analytics

Purpose: statistical research/analysis on aggregated or anonymous data aimed at measuring the proper functioning of this website.

Legal basis: this is anonymised data to which the legislation on the protection of personal data does not apply (they do not allow the user to be traced and identified or made identifiable).

Obligatory nature of the provision of data: the provision of data is left to your will, but it is indispensable in order to visit the site and access its various functions.

Notes on processing:

The Data Controller uses the Google Analytics service to collect aggregate data on site performance. See the [analytics cookies](#) section for more information.

c) Management of user request form (contacts, stakeholders, accesses)

Purpose: acknowledgment/fulfilment of direct request from user (for example with the spontaneous sending of messages, electronic mail to the addresses of Xenia S.p.A. SB indicated on the site that involve the subsequent acquisition of their name and surname and other personal data that may be included in the relative communication).

Data processed: identification data (such as, for example, name, surname, etc.) and contact data (such as, for example, email address, telephone number, etc.) or other data provided by the user in requests.

Legal basis: performance of a contract to which the data subject is party or performance of pre-contractual measures taken at the data subject's request, Art. 6, par. 1, lett. b) of the GDPR.

Obligatory nature of the provision of data: the provision of data is left to your will, but it is indispensable in order to comply with your requests.

Notes on processing and storage time:

Currently, the website supports three types of direct requests:

Contact via the contact form. We only collect the data strictly necessary to respond to the contact request.

Stakeholder requests for documents. We only collect the data strictly necessary to answer the stakeholder's request.

Request for access to the reserved area. We only collect the data strictly necessary to enable user authentication in order to allow access to the reserved area.

The personal data transmitted by filling in the above-mentioned forms are exclusively used for the above-mentioned purpose, and are not processed for marketing or profiling purposes or for any other purpose other than those indicated. They are not transmitted to third parties. They are deleted once the customer's request has been fulfilled. Authentication logs are deleted when the session is closed.

d) Recruitment

Purpose: management of applications received and selection of personnel for possible establishment of a work relationship or collaboration.

Data processed: identification data (such as, for example, name, surname, tax code, etc.), contact data (such as, for example, email address, telephone number, address of residence and/or domicile, etc.), data relating to work experience and course of study.

Legal basis: performance of a contract to which the data subject is party or performance of pre-contractual measures taken at the data subject's request, Art. 6, par. 1, lett b) of the GDPR.

Obligatory nature of providing data: the provision of data is left to your will, but is indispensable for the evaluation of your application by Xenia S.p.A. SB.

Notes on processing and storage time:

The CVs transmitted are used exclusively for recruitment purposes. In case of non-recruitment they are kept for a period of 6 months.

In the event of recruitment, the CV will be retained for the entire duration of the employment relationship for the purpose of verifying the information provided, as it is an element of the employment contract. Furthermore, the Owner adheres to quality certification systems that require the retention of the CVs of those hired.

CV data are not passed on to third parties. They may be processed by data processors that the Controller uses in its business organisation.

e) Verification, exercise, and/or defence of a right

Purpose: defence of rights.

Legal basis: legitimate interest, art. 6, par. 1, lett. f) of the GDPR

Notes on processing and storage time:

The legitimate interest of the Data Controller is to exercise rights and defend itself both judicially (including pre-litigation) and extra-judicially against third parties (including public entities) and against data subjects.

Personal data collected for this purpose are retained for 10 years, as provided for by the ordinary limitation period (Art. 2946 of the Civil Code), unless the limitation period is interrupted.

3. RECIPIENTS OF DATA

Data are processed by authorised personnel (pursuant to art. 29 of the Regulations) by Xenia S.p.A. SB or by suppliers specifically appointed as Data Processors (pursuant to art. 28 of the Regulations) who act on the instructions of the Data Controller.

The complete and updated list of data processors can be requested from the Data Controller at the addresses indicated above.

4. TRANSFER OF DATA ABROAD

We also use back office services located outside the EU/EEA (Albania). This processing is carried out in accordance with the applicable legislation, through the use of legal guarantees, in particular standard contractual clauses approved by the European Commission. You may obtain a copy of these by making a request to the Controller.

5. RIGHTS OF THE DATA SUBJECT

You can exercise your rights under the GDPR regarding your personal data by writing to privacy@xeniahhs.com. We will endeavour to respond to your request as soon as possible and in any event no later than thirty days from receipt of your report. In certain cases, we will ask you for a copy of an identification document if, in connection with your request, it is necessary to verify your identity. In particular, you may exercise the following rights:

- **Right of access**, i.e. the right to know whether personal data concerning you is being processed and, if confirmed, to obtain a copy of such data and to be informed about: the source of the data, the categories of personal data processed, the recipients of the data, the purposes of the processing, the existence of automated decision making (including profiling), the data retention period, the rights under the GDPR; Diritto di ottenere la rettifica o l'integrazione dei tuoi dati;
- **Right to obtain the deletion** of personal data if such data are no longer necessary for the purposes for which they were collected, or if we are no longer authorised to process them;
- **Right to obtain restriction of the processing of personal data** in the following cases: i) you have contested the accuracy of the personal data. You may request a restriction of the processing for the period necessary to verify the accuracy of the data; ii) we are no longer authorised to process the data, and instead of deleting it, you may ask us to restrict its use; iii) if the personal data in our possession, although no longer necessary for the purposes for which

it was collected, is necessary for you to establish, exercise or defend a right in court;

- **Right to data portability**, i.e. the right to receive in a structured, commonly used and machine-readable format the personal data concerning you, as well as the right to request that such data be transmitted to another Controller;
- **Right to withdraw consent**, for processing based on it;
- **Right to object** at any time to the processing of your personal data based on our legitimate interest.

You also have the right to lodge a complaint with the competent data protection supervisory authority if you consider that the processing of your data is contrary to the provisions of the GDPR.

We reserve the right to update the content of this page from time to time. We encourage you to consult this policy regularly in order to keep up to date with any changes that have occurred since your last consultation.

ANNEX 1 - REQUEST FORM FOR THE EXERCISE OF PERSONAL DATA PROTECTION RIGHTS

For the attention of Xenia Hotellerie Solution S.p.A. SB

EXERCISING DATA PROTECTION RIGHTS

(Articles 15-22 of Regulation (EU) 2016/679)

I, the undersigned....., born at on
....., hereby exercise the following rights under Articles 15-22 of Regulation (EU) 2016/679:

1. Access to personal data

(Art. 15 of Regulation (EU) 2016/679)

I, the undersigned (please *tick only the boxes that apply*):

- ☐ requests confirmation as to whether or not personal data concerning him are being processed;
- ☐ in case of confirmation, requests to obtain access to or a copy of such data, and all the information provided for in points (a) to (h) of Article 15(1) of Regulation (EU) 2016/679, and in particular:
 - the purposes of the processing;
 - the categories of personal data processed;
 - the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organisations;
 - the intended period of retention of personal data or, if this is not possible, the criteria used to determine that period;
 - the origin of the data (i.e. the subject or specific source from which it was acquired);
 - the existence of an automated decision-making process, including profiling, and significant information on the logic used, as well as the importance and expected consequences of such processing for the Data Subject.

2. Request for data intervention

(Articles 16-18 of Regulation (EU) 2016/679)

The undersigned requests the following (please *tick only the boxes that apply*):

- ☐ rectification and/or updating of data (Art. 16 of Regulation (EU) 2016/679);
- ☐ deletion of data (Art. 17(1) of Regulation (EU) 2016/679), for the following reasons (*please specify which*):
 - a)
 - b)
 - c)

in the cases provided for in Article 17(2) of Regulation (EU) 2016/679, a statement that the Controller has informed other data controllers of the data subject's request to delete links,

- ☐ copies or reproductions of your personal data;
- ☐ limitation of processing (Art. 18) for the following reasons (*tick the boxes that apply*):
 - ☐ disputes the accuracy of personal data;
 - ☐ the processing of the data is unlawful;
 - ☐ the data are necessary for the establishment, exercise or defence of legal claims;
 - ☐ the data subject has objected to the processing of the data pursuant to Article 21(1) of Regulation (EU) 2016/679.

This request concerns (indicate the personal data, data categories or processing referred to):

3. Data portability

(Art. 20 of Regulation (EU) 2016/679)

With reference to all personal data provided to the Controller, the undersigned requests (*please tick only the boxes that apply*)

- ☐ receive such data in a structured, commonly used and machine-readable format;
- ☐ transmit directly to the following different data controller (*please specify the identification and contact details of the data controller:*):
 - ☐ all personal data provided to the Controller;
 - ☐ a subset of such data.

This request concerns (indicate the personal data, data categories or processing referred to):

4. Objection to treatment

(Art. 21(1) of Regulation (EU) 2016/679)

- ☐ I object to the processing of my personal data pursuant to Article 6(1)(e) of Regulation (EU) 2016/679, on the following grounds related to my particular situation (please specify):

The undersigned:

- ☐ Asks to be informed, pursuant to Article 12(4) of Regulation (EU) 2016/679, at the latest within one month of receipt of this request, of any reasons preventing the Controller from providing the information or carrying out the requested operations.
- ☐ He asks, in particular, to be informed of the existence of any conditions preventing the Controller from identifying him as a data subject, pursuant to Article 11(2) of Regulation (EU) 2016/679.

Address for reply (please enclose identification)

Street/Square _____ No. _____
Municipality _____ Province _____ Postal code _____ or
e-mail/PEC: _____

Any clarifications

The undersigned specifies (provide any relevant explanations or indicate any attached documents):

(Place and date) _____

(Signature)