

**INFORMATION ON THE PROCESSING OF PERSONAL DATA  
of the users visiting the websites of Residenza di Ripetta**

***Pursuant to Article 13 of EU Regulation 2016/679***

This page contains a description of the policies for managing the website in regard to processing the personal data of the users who visit the site and their privacy. This information is provided pursuant to article 13 of GDPR 679/2016 – Laws concerning the Protection of Personal Data and the individuals who interact with the web services of Hotel Residenza di Ripetta, which is accessible by telematics means through the following web address:

<http://www.residenzadiripetta.com>,

which corresponds to the home page of the official website of Hotel Residenza di Ripetta on Via di Ripetta, 231 - 00186 Rome

This informative note is provided only for the aforementioned website and not for other websites eventually accessed by the user through links.

**THE “CONTROLLER”**

Following access to this website, data pertaining to persons that are identified or identifiable may be processed. The “Data Controller” of the personal data collected following a visit to our website or any other data used for providing our services is Residenza di Ripetta Srl, Via Claudio Monteverdi, 16 - 00198 Roma. The Data Protection Coordinator is Mr. Massimo Bruno, who can be contacted at [privacy@residenzadiripetta.com](mailto:privacy@residenzadiripetta.com).

**PLACE WHERE DATA IS PROCESSED**

Data processing pertaining to the web services of this website [(physically hosted by OVH ("www.ovh.it") in France)] is carried out at the aforementioned headquarters and said data is processed only by the technical personnel in charge of processing of the Data Processing Office, or by eventual persons in charge of processing who are entrusted to process occasional maintenance operations.

The personal data obtained from the users who submit hotel reservation requests or through informative material (informative notes, newsletters, registration, etc) is used only to carry out the services or assistance requested and is not transmitted to third parties, except in the following possible cases:

- Business partners of Residenza di Ripetta Srl, Hotel Residenza di Ripetta to whom the controller transmits the data exclusively in order to avoid on-line reservations;
- Persons, companies or professional offices who lend assistance and consulting services to, Residenza di Ripetta Srl concerning accounting, administrative, legal, financial and tax matters;
- Subjects who are authorized to have access to the data by law or through requests by the authorities;

The credit card data used for booking will be automatically unavailable at the end of the stay.

**CATEGORIES OF PROCESSED DATA**

***Navigational data***

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties.

This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment.

These data are only used to extract anonymous statistical information on website use as well as to check its functioning; they are erased immediately after being processed. The data might be used to establish liability in case computer crimes are committed against the website; except for this circumstance, any data on web contacts is currently retained for no longer than seven days.

***Data voluntarily provided by the user***

Sending e-mail messages to the addresses mentioned on this website, which is done on the basis of a freely chosen, explicit, and voluntary option, entails acquisition of the sender's address, which is necessary in order to reply to any request, as well as of such additional personal data as is contained in the message(s).

Data will be retained only for registration request to send the newsletters or special offers and will not be disclosed to anyone.

The personal information regarding the individual who visited the website is not collected or used. The visitors remain anonymous. The only exception to this rule concerns the information for personal identification needed to fulfill the contractual obligations of reservations on behalf of the user.

### ***Reservations***

In the event of reservations made through the website, the user must provide his name, address, telephone number and information regarding the payment manners and credit card used. Residenza di Ripetta Srl will use said information only to process the reservations and to send specific information, which is relevant to the confirmation of said, such as a receipt, the reservation code and the conditions.

The information provided will not be used for marketing purposes and will not be sold, transmitted, given by contract or sent to third parties in any way, with the exception of our provider of on-line reservation services, BLASTNESS, (<https://www.blastness.com>), to whom elaboration of the reservations is entrusted to, only for online booking management purposes.

In any event, the administrator of the website guarantees the use of scrupulous procedures in order to protect the navigational data and the use of particular precautions to protect the data pertaining to the credit card, which is provided during on-line reservations.

### ***Personal Data Processing Collected from Curriculum Vitae***

Residenza di Ripetta Srl accept Personal Curriculum Vitae of possible candidates exclusively via e-mail in PDF format. Providing spontaneous and voluntary of the Curriculum Vitae data will be considered as implicitly informed consent by the data subjects for personal data processing contained, only following the purposes related to the selection of potential candidates.

The data processed for the purpose of selection of candidates are personal useful to search for the particular profile. In general, the nature of the data is normal, except in some cases where you may indicate any sensitive data necessary to identify the specific requirements of the regulations, such as specifying a particular protected classes, the suitability for certain jobs and / or start-ups required, within the limits set by the General Authorisation of the Garante no. 1 of December 15, 2016 (Published in the Official Gazette no. 303 of December 29, 2016);

The provision of data relating to the selection of candidates is required. Any refusal to provide such data makes it impossible to perform an orderly selection and the possible recruitment. The data in question will not be disclosed to anyone.

### ***General Rules for providing the CV***

Any CV received spontaneously, replying to a job advertisement, will be stored directly by person in charge of the processing in accordance with the safety guidelines of personal data adopted in compliance with the security measures according to Chapter IV Section 2 of GDPR 679/2016. These will be printed only on the occasion of a meeting and a conversation with the data subject. After the interview, if the candidate is not selected, the CV will be deleted and / or destroyed.

In all other cases, the CVs will be stored for a year and after will be deleted from the PC and, if printed, they will be destroyed.

To send Curriculum Vitae use only the following addresses:

Human Resources Dpt, Residenza di Ripetta Srl, Via Claudio Monteverdi, 16 - 00198 Roma

e-mail: [eva.damico@residenzadiripetta.com](mailto:eva.damico@residenzadiripetta.com).

### **PERIOD FOR DATA RETENTION - CRITERIA USED**

According to the provisions set forth in art. 5 par. 1 lett. e) of the Regulation (EU) 2016/679, collected personal data shall be kept in a form which permits identification of data subjects for a period not exceeding the purposes for which the personal data were collected and subsequently processed.

Data retention periods depend on the purposes of the processing:

- purposes related to technical navigation data for the correct functioning of the website: retention only for the related session, after which the data are deleted;
- purpose of reply to info request/services supply request (up to 12 months for contact requests ; 10 years for administrative / accounting / financial documentation relating to the provision of a service);
- data collection for staff recruitment (up to 12 months);
- newsletter, marketing or promotional communications in general (up to 24 months -until withdrawal of consent)
- purpose of administrative / accounting / financial management: 10 years as as required by law for the conservation of administrative / accounting / financial documentation.

## COOKIES TECHNOLOGIES

In this website we are applied cookies technologies for different purposes, including computer technology authentication or to monitor sessions, and to store specific technical information regarding the users that access the server of OVH and BLASTNESS, respectively the website hosting maintenance and hotel booking service provider.

### **Description of the cookie mechanisms adopted:**

- Cookie implanted in the user/contracting party's terminal directly (that will not be used for other purposes) such as session cookies used for on-line booking on the website, authentication or customisation cookies (for example, the choice of the browsing language); these cookies remain active only for the duration of the session.
- Cookie used to statistically analyse accesses/site visits (the so-called "analytic" cookie) that are used for statistical purposes, and to collect aggregate information without the possibility of tracing back to the identification of the individual user personal computer. In these cases, since current legislation requires that, when using analytic cookie, the user is given clear and adequate instructions to easily oppose implementation of such (including any mechanisms to make the cookies anonymous), we give instructions on how to disable installed cookies below. The duration of analytic technical cookie is averagely of 30 minutes.

### *How to modify settings on the cookies*

Most browsers allow to clear cookies from your computer hard drive, block acceptance of cookies or receive a warning before a cookie is stored.

Therefore, to remove cookies we encourage you to follow the instructions on the pages of the most used internet browsers:

Chrome: <https://support.google.com/chrome/answer/95647?hl=it>

Fire fox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>

Microsoft Edge: <https://privacy.microsoft.com/it-IT/windows-10-microsoft-edge-and-privacy>

Safari: [http://support.apple.com/kb/HT1677?viewlocale=it\\_IT](http://support.apple.com/kb/HT1677?viewlocale=it_IT)

### **"Third-party" cookies**

Third-party cookies are code parts set by a website different than the website you are currently browsing.

This involves the transmission of cookies from third parties. In this website is carried out the google analytics technology for statistical monitoring of the website visits. This technology uses a tracking code that sets third party cookies and JavaScript files lingering on each visitor's computer. In addition to transmitting information to a Google server, these cookies store information such as whether the visitor has been to the site before (new or returning visitor), the timestamp of the current visit, and the referrer site or campaign that directed the visitor to the page.

The privacy policies available on the websites described above. Visitors in any case can turn off the advertising features of Google Analytics on this site by installing the Add-off for your browser downloadable from this [LINK](#).

More google analytics privacy policies available on <http://www.google.com/policies/technologies/ads/>

List of used cookie

Nome	Tipo	Finalità	Dati Inviati in	Scadenza	Fornitore
PHPSESSID	HTTP	This third party cookie is used to maintain information about each visit to the website and enable core site functionality. This cookie does not contain any personal information, and only lasts for the duration of user's visit, being deleted as soon as a user closes a web browser.	Italy (Adequate)	Session	dimoredieccellenza.it
SESS#	HTTP	Questo cookie di prima parte viene utilizzato per conservare informazioni su ogni visita al sito Web e abilitare la funzionalità del sito principale. Questo cookie non contiene alcuna informazione personale, e dura solo per la durata della visita dell'utente, essendo cancellato non appena un utente chiude un browser web.	France (Adequate)	Session	residenzadiripetta.com

<i>_gid</i>	<i>HTTP</i>	This cookie is used to distinguish users. Is used only to realise statistical analysis (through Google analytic service)	<i>USA (Adequate)</i>	<i>1 Day</i>	<i>residenzadiripetta.com</i>
<i>_gat</i>	<i>HTTP</i>	This cookie is used by Google Analytics to monitor requests rate toward their servers. This cookie helps us to identify website areas to be improved and the <i>_gat</i> cookie does not allow us to identify user personally as no personal information or data is tracked	<i>USA (Adequate)</i>	<i>1 Day</i>	<i>residenzadiripetta.com</i>
<i>_ga</i>	<i>HTTP</i>	This cookie is used to distinguish users when collecting information about page visits. This cookie helps us to identify website areas to be improved and the <i>_ga</i> cookie does not allow us to identify user personally as no personal information or data is tracked	<i>USA (Adequate)</i>	<i>2 Years</i>	<i>residenzadiripetta.com</i>
<i>r/collect</i>	<i>Pixel</i>	This cookie is used to send data to Google Analytics about the device and user behavior. It tracks the user on devices and marketing channels.	<i>USA (Adequate)</i>	<i>Session</i>	<i>doubleclick.net</i>
<i>rc::c</i>	<i>HTML</i>	This cookie is used to distinguish the action between humans and robots.	<i>USA (Adequate)</i>	<i>Session</i>	<i>google.com</i>
<i>_gcl_au</i>	<i>HTTP</i>	This cookie is used by Google AdSense to test advertising efficiency on all websites that use their services.	<i>USA (Adequate)</i>	<i>3 Months</i>	<i>residenzadiripetta.com</i>
<i>scd</i>	<i>HTTP</i>	Unclassified	<i>France (Adequate)</i>	<i>Session</i>	<i>residenzadiripetta.com</i>
<i>time_in_page</i>	<i>HTTP</i>	Unclassified	<i>Francia (Adequate)</i>	<i>Session</i>	<i>residenzadiripetta.com</i>
<i>z_cookie_wow</i>	<i>HTTP</i>	Technical cookie of the Zillioon platform (Mentefredda)	<i>France (Adequate)</i>	<i>20 Years</i>	<i>residenzadiripetta.com</i>

### ***Embedded content (Third party cookies)***

Residenza di Ripetta Srl sometimes uses social content like Instagram, Facebook, LinkedIn and possibly embeddable content from other platforms. Residenza di Ripetta Srl cannot control these third-party cookies and for this is it possible to contact any third party to have more control over these cookies. A few links to the privacy policy of third-party cookies:

- [\*Facebook\*](#)
- [\*Instagram\*](#)
- [\*LinkedIn\*](#)

Nevertheless, if you block or erase cookies, it may not be possible to reset previously specified preferences or customised settings, and our capacity to customize the user experience will be limited.

### **TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES**

Personal data is not transferred to non-EU third countries, except for any cases described above where the controller provide appropriate safeguards in particular, for transfers to the USA, it takes place on the basis of an adequacy decision of the EU Commission vs third country or an International organization (Article 45 GDPR), particularly the decision on the adequacy of the protection provided by the EU-U.S. Privacy Shield of 12 July 2016.

### **OPTIONAL DATA PROVISION**

Subject to the specifications made with regard to navigation data, users are free to provide the personal data listed in the request forms of Residenza di Ripetta or referred to in contacting the hotel in order to provide CV, to make on-line reservations or to request delivery of information materials and other communications. Failure to provide such data may entail the failure to be provided with the items requested.

### **PROCESSING ARRANGEMENTS**

Personal data is processed with automated means for no longer than is necessary to achieve the purposes for which it has been collected. Specific security measures are implemented to prevent the data from being lost, used unlawfully and/or inappropriately, and accessed without authorisation.

## DATA SUBJECTS' RIGHTS

The data Controller is Residenza di Ripetta Srl. The Data Protection Coordinator is Mr. Massimo Bruno- You may contact them at any time to exercise your rights as provided for in Chapter III GDPR 679/2016, in particular, the right to obtain confirmation as to whether or not personal data concerning you exist and the logic applied to the processing, the right to ask for their integration, the right to object to their processing on legitimate ground, and the right to request rectification, updating, erasure (right to be forgotten) or blocking of data that have been processed unlawfully, the right to obtain a copy of the personal data being processed as well as the right to data portability, also by sending a written request to the following e-mail address: [privacy@residenzadiripetta.com](mailto:privacy@residenzadiripetta.com). At the same address it is possible to contact the Data Protection Officer.

## RIGHT TO LODGE A COMPLAINT

If a data subject considers that the processing of personal data relating to him or her as performed via this website infringes the Regulation, he or she has the right to lodge a complaint with the Garante pursuant to Article 77 of the Regulation, or else to bring a judicial proceeding against the Garante pursuant to Article 79 of the Regulation.