

NOTICE ON THE PROCESSING OF PERSONAL DATA

Quote request through the website

Pursuant to and for the purposes of Articles 12 and 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), the Data Controller provides data subjects with the following information regarding the processing of personal data provided through the quote request form on the website.

1. Data Controller and contact details

Rome Art Hotel S.r.l

TAX CODE / VAT NUMBER: **15495151001**

REGISTERED OFFICE ADDRESS: **VIA DEI DUE MACELLI 120 - CAP 00187 - ROMA**

LEGAL REPRESENTATIVE AND DATA CONTROLLER: **PALERMO LINO**

PHONE: **06 69 94 04 87**

EMAIL: **info@romearthotel.com**

PEC (CERTIFIED EMAIL): **romearthotelsrl@legalmail.it**

2. Data Protection Officer (DPO)

The Data Controller has appointed a Data Protection Officer, who may be contacted at: Dr. Antonello Dionisi **dpo@hideea.com**.

3. Purposes of processing and legal basis

Personal data is processed for the following purposes:

Purpose	Legal basis
a) Management of the quote request: Examination of the request, preparation of the quote, possible contact for clarifications and pre-contractual communications.	Art. 6, para. 1, letter b) GDPR — Processing necessary for the performance of pre-contractual measures taken at the request of the data subject.
b) Preparation of the quote requiring the processing of special categories of personal data: management of the quote request which, due to the nature of the service or project described by the data subject, entails the need to process data under Art. 9, para. 1, GDPR (racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation) for the purposes of the correct and complete preparation of the quote	Art. 9, para. 2, letter a) GDPR — Explicit consent of the data subject.

The provision of data for the purpose referred to in letter a) is **optional**, but failure to provide it makes it impossible for the Data Controller to follow up on the request and prepare the quote.

The provision of any special categories of personal data for the purpose referred to in letter b) is **entirely voluntary** and requires **separate, explicit consent**, which will be collected by means of a specific *checkbox* in the request form, not pre-selected. In the absence of such consent, any special data entered will not be processed and will be immediately deleted. Failure to consent to the processing of special data does not in any way preclude the handling of the quote request for ordinary data.

4. Types of personal data processed

The Data Controller processes the following categories of personal data:

- **Identification and contact data:** first name and surname, e-mail address, telephone number (if provided), any company or entity of affiliation.
- **Data relating to the request:** content of the message, descriptive information on the project or service for which the quote is requested, any attachments uploaded by the data subject.
- **Technical browsing data:** IP address, session data and system logs, automatically processed by the web servers for security and site operation purposes pursuant to Art. 122 of Legislative Decree 196/2003, without the need for consent.
- **Special categories of personal data (Art. 9, para. 1, GDPR):** should the description of the project or service requested make it necessary, for the correct preparation of the quote, for the data subject to communicate data relating to their health, religious beliefs, trade union membership or other special categories — consider, by way of example, a quote for the removal of architectural barriers for a person with a disability, catering services with religious requirements, consultancy services for trade union bodies, or professional services involving the use of biometric data — the Data Controller will process such data exclusively subject to the **explicit consent** of the data subject, pursuant to Art. 9, para. 2, letter a), GDPR.

Explicit consent is collected by means of a dedicated, non-pre-selected *checkbox*, placed in the quote request form immediately adjacent to the submit button, with clear and specific wording.

In the absence of a check on the *checkbox*, any special data present in the message or attachments will be immediately deleted and will not be subject to any processing. The Data Controller adopts enhanced technical and organizational measures to isolate and protect the special data processed, including encryption and storage separate from ordinary data, in accordance with Art. 32 GDPR and the principle of minimization set out in Art. 5, para. 1, letter c), GDPR.

Processing is carried out using IT and telematic tools, as well as e-mail systems, with organizational and processing logic strictly related to the purposes indicated and, in any case, in such a way as to guarantee the security, confidentiality and integrity of the data, in compliance with the appropriate technical and organizational measures set out in Art. 32 GDPR.

No automated decision-making processes or profiling activities are adopted pursuant to Art. 22 GDPR.

6. Recipients and categories of recipients

Personal data is processed by the Data Controller's personnel expressly authorized to process data and may be disclosed to the following parties, acting as data processors pursuant to Art. 28 GDPR or as independent controllers:

- **IT and hosting service providers:** companies that manage and maintain the website and e-mail servers.
- **Consultants and professionals engaged by the Data Controller:** where necessary for the preparation of the quote or for administrative and accounting compliance.
- **Public authorities and supervisory bodies:** in the cases provided for by law.

The updated list of data processors is available at the Data Controller's premises.

7. Transfer of data to third countries

Personal data is not transferred to third countries or international organizations outside the European Economic Area. Should data transit on servers located outside the EEA for the provision of IT services, the transfer takes place on the basis of adequacy decisions of the European Commission or appropriate safeguards (standard contractual clauses), available from the Data Controller.

8. Retention period

Data collected through the quote request form is retained for the time strictly necessary to manage the request and, in any case:

- **If the quote is not accepted and no contractual relationship is established:** the data is retained for a maximum period of 15 days from the date the request is received, unless the data subject requests earlier deletion.
- **If the quote is accepted and a contractual relationship is established:** the data will be included in the contractual file and retained for the duration of the relationship and for the following 10 years from its termination, a period corresponding to the ordinary limitation period under Art. 2946 of the Civil Code and to the retention period for accounting records under Art. 2220 of the Civil Code, necessary for tax and accounting compliance and for the judicial protection of rights.

Technical browsing data (system logs) is retained for the minimum time required by IT security needs, without prejudice to any further retention necessary to comply with legal obligations or for the purposes of investigating and prosecuting crimes pursuant to Art. 132 of Legislative Decree 196/2003.

9. Rights of the data subject

The data subject may exercise the following rights against the Data Controller at any time:

Right	Regulatory reference	Content
Access	Art. 15 GDPR	Obtain confirmation of the existence of processing and access to one's own personal data and to the information referred to in this notice
Rectification	Art. 16 GDPR	Obtain the correction of inaccurate personal data or the completion of incomplete data
Erasure (right to be forgotten)	Art. 17 GDPR	Obtain the erasure of personal data, in the cases provided for by law
Restriction of processing	Art. 18 GDPR	Obtain the restriction of processing where the conditions set out by law are met
Portability	Art. 20 GDPR	Receive data in a structured, commonly used and machine-readable format, and transmit it to another Data Controller, where technically feasible
Objection	Art. 21 GDPR	Object to processing for reasons connected with one's particular situation, including processing for direct marketing purposes
Withdrawal of consent	Art. 7, para. 3, GDPR	Withdraw consent at any time, without affecting the lawfulness of processing based on consent given before its withdrawal
Complaint	Art. 77 GDPR	Lodge a complaint with the Data Protection Authority (Garante) (www.gpdp.it) or seek judicial remedy (Art. 79 GDPR)

The data subject also has the right to **withdraw consent at any time**, where processing is based on consent, without affecting the lawfulness of processing carried out before the withdrawal (for the processing covered by this notice, the legal basis is not consent, so withdrawal does not apply).

10. Right to lodge a complaint

The data subject has the right to lodge a complaint with the competent supervisory authority, which for Italy is the **Data Protection Authority (Garante per la protezione dei dati personali)** (www.garanteprivacy.it), or to take legal action pursuant to Art. 79 GDPR and Art. 140-bis of Legislative Decree 196/2003.

11. Manner of exercising rights

To exercise the rights indicated above, the data subject may send a written request to the Data Controller:

- by e-mail to: **dpo@hideea.com**
- by certified e-mail (PEC) to: **romearthotelsrl@legalmail.it**
- by ordinary mail to the Data Controller's registered office.

The Data Controller will respond within one month of receipt of the request (a period that may be extended by two months in the event of particular complexity or number of requests, with an obligation to inform the data subject of the extension within the first month), pursuant to Art. 12, para. 3, GDPR. The response is free of charge, except in the case of manifestly unfounded or excessive requests.