

Privacy Policy relating to the website www.hotelvilon.com, www.hotelvilon.it www.vilon.it

This privacy policy statement and the protection of your personal data (called Privacy Policy or Privacy Notice) will let you know how VILON S.R.L. with sole shareholder, with registered office in Rome, Via Nazionale 200, tax code with VAT number n. 14160441003, as manager of the hotel structure exercised under the "Vilon Hotel" sign in Rome, Via dell'Arancio n. 69 (hereinafter "VILON"), uses and manages the information that you will provide us, your personal data and any sensitive data that, in order to offer you the services requested, will be collected from the website www.hotelvilon.com, www.hotelvilon.it www.vilon.it.

Below are the methods proposed by the site through which the user can communicate with VILONVILON providing his personal data (hereinafter referred to as "contact methods").

Later in this document the individual contact modalities are described in detail.

To go directly to the description of the single contact mode click on its name below: CONTACT MODES OFFERED BY THE SITE www.hotelvilon.com, www.hotelvilon.it www.vilon.it TELEPHONE, FAX, EMAIL AND POSTAL ADDRESS CONTACT FORM MODULE SUBSCRIPTION TO SERVICE NEWSLETTER FORM REQUEST INFORMATION REQUEST FOR RESERVATION SPA TREATMENTS.

This information will also illustrate your faculties and your rights regarding the data that will be provided to us, in the absence of which VILON may not be able, in whole or in part, to offer you its services.

This information is also inspired by the Recommendation n. 2/2001 that the European Authorities for the protection of personal data, gathered in the Group established by the art. 29 of the directive n. 95/46 / EC, adopted on 17 May 2001 to identify certain minimum requirements for the collection of personal data online, and, in particular, the methods, timing and nature of the information that the data controllers must provide to the users when they connect to web pages, regardless of the purpose of the link.

Reproduction, even partial, in any form, of the contents of this document is forbidden.

PRIVACY DISCLOSURE PURSUANT TO ART. 13 EUROPEAN REGULATION 679/2016

Data controller

VILON S.R.L. Registered office: via Nazionale 200- 00184 Rome - operational headquarters: via dell'Arancio n. 69-00186 Rome tax code and VAT no. 14160441003 registered reg. Imp. Of Rome limited liability company
PEC: vilonsrl@pec.it

Identity of treatment

The collection and processing of data is carried out by dgNet S.r.l. – VAT no. 06305950484 exclusively for the web services of the site: www.hotelvilon.com, www.hotelvilon.it www.vilon.it and are handled by appointed technical staff.

Navigation data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users who connect to the site, where required.

Data provided voluntarily by the user:

The optional, explicit and voluntary sending of e-mails to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message.

While browsing the site www.hotelvilon.com, www.hotelvilon.it www.vilon.it you will be given the opportunity to contact VILON, even in non-electronic form. Regarding the information that may be requested or that will be spontaneously provided, we wish to inform you that the provision of data may be optional and in others, however, mandatory and, in such cases, any refusal to provide such data could have, as a consequence, the failure or partial execution of the relationship.

2. Processing methods

Your data will be processed - by the persons in charge of processing it - with manual, computerized and telematic tools within and for the purposes specified above and, in any case, always respecting the security and confidentiality of the same, also in compliance with the law and the provisions of the Guarantor for the protection of personal data.

In particular, it is guaranteed to store and control the personal data being processed, also in relation to the knowledge acquired according to the technical process, the nature of the data and the specific characteristics of the treatment, so as to minimize, through the adoption of suitable security measures, risks of destruction or loss, even accidental, of the data itself, of unauthorized access to the processing or not permitted or not in accordance with the purposes of the collection.

3. Responsible for processing company data

The data processors of Vilon Srl have been divided into concern areas having as their internal contact point Mr. Dario Di Domenico.

The designated managers constitute the point of contact for those interested in receiving information on the processing of their data and / or for the control authority; the same can be contacted at the certified e-mail address: vilonsrl@pec.it

4. Persons in charge of processing

The people in charge are the physical persons who, under the direct authority of the data owner or of the subjects appointed by the latter, carry out the processing operations of personal data.

VILON Srl warrants that it has appointed its employees in writing and that it is responsible for providing the parties whose written and detailed instructions regarding the method of processing, in compliance with the provisions of the law.

In the case of changes in the attributions of the individual officers, the latter will be communicated in writing.

In any case, external responsible for data processing Web services is dgNet S.r.l. – VAT number 06305950484, whose data can be traced on the site www.dgnet.it and in the special section: privacy / policy.

5. Obligation of supervision and control

VILON Srl guarantees to carry out training activities for its personnel involved in processing operations, according to their respective duties, diversifying the level of in-depth analysis and operating instructions on the basis of the types of data processed by the Distributors during their activity.

Therefore, by virtue of the present document, it is guaranteed to supervise the work of its persons in charge of processing.

6. Purpose and legal basis of data processing

The data collected and processed will be used exclusively for the purposes: commercial and services related to the website.

The processing of personal data - including any sensitive data ("special categories of data" Article 9 GDPR) and relating to criminal convictions or crimes ("judicial" article 10GDPR) for which you need your consent to be expressed at the bottom to this information - collected, takes place for the purposes of management identified above.

All data collected are treated, therefore, exclusively for obligations related to the activity of the owner, whose legal bases can be found at the time of signing a contract with the structure.

In the absence of a written document, the processing of data will be made on the explicit consent of the interested party and considered as a condition of lawfulness pursuant to and for the purposes of art. 6 of the EU Regulation.

The services / products offered by the owner are reserved for subjects legally able, on the basis of the national reference legislation, to conclude obligations.

The service acquires personal data for the following purposes: To respond to your general requests and / or reservation of a hotel service provided by VILON. SERVICE DESCRIPTION By browsing the site you may find our telephone numbers, fax numbers, e-mail addresses and postal addresses to be able to contact you. Contact Form SUPPLIER-MANAGER OF CONTACT MODE The service is provided and managed directly by this Application. PURPOSE OF THE ACQUISITION OF PERSONAL DATA The service acquires personal data for the following purposes: Respond to the request for information. SERVICE DESCRIPTION This module is used to request general information. Subscription form to the newsletter service SUPPLIER-MANAGER OF CONTACT MODE The service is provided and managed directly by this Application. PURPOSE OF ACQUISITION OF PERSONAL DATA The service acquires personal data for the following purposes: Newsletter subscription. TRANSFER OF THE DATA COLLECTED TO THIRD PARTIES The data acquired from this service will be transferred to the following categories of third parties: Employees, Employees, Possible service providers sending bulk emails, Personnel handling and maintaining the site, Interns, Trainees. SERVICE DESCRIPTION This form is used to provide your email address to request subscription to the Newsletter service. Request Form Information SUPPLIER-MANAGER OF CONTACT MODE The service is provided and managed directly by this Application. PURPOSE OF THE ACQUISITION OF PERSONAL DATA The service acquires personal data for the following purposes: Respond to the request for information. SERVICE DESCRIPTION This module is used to request general information. Reservation request SPA treatments SUPPLIER-MANAGER OF CONTACT MODE The service is provided and managed directly by this Application. PURPOSE OF THE ACQUISITION OF PERSONAL DATA The service acquires personal data for the following purposes: Making a reservation. DESCRIPTION OF THE SERVICE Through this form users of the site have the possibility to book SPA treatments for a specific date. During your contact with VILON. You may be asked to provide us with useful information

for the continuation of our relationship through "free" request fields (sending forms, sending e-mails and other contacts). In this specific case you will be free to send us further information that will always be treated in accordance with the current provisions on the protection of privacy. It is important to point out that, in some cases, in the absence of the information we may request, we will not be able to offer, in whole or in part, our services.

7. Nature of the provision of data

The provision of personal data and the consequent processing by the Data Controller, for the purposes set out above, are necessary for the establishment, for the continuation and for the correct management of the relationship between the Data Controller and the Data Subject or must be understood as mandatory on the basis of law, regulation or community legislation; any refusal to provide the requested personal data may cause the impossibility, in whole or in part, to refine and manage the relationship in being or in progress.

The provision of personal data and the consequent processing by the Owner for the purposes referred to in paragraph 6), is optional and failure to provide, even partially, will not result in any consequence.

8. Right of access and portability of data

The right concerns the data "supplied" by the interested party is limited to personal data in the broadest sense.

The interested party has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet registered, and their communication in intelligible form.

On the other hand, the data generated by the data controller are not included on the basis of the analysis of data provided or collected by the data subject (inferred and derived data, eg credit score), or obviously data obtained from third parties.

The right to data portability does not imply any obligation to store data beyond the period established by the rules for the sole purpose of guaranteeing the exercise of portability.

The interested party has the right to receive, free of charge, the data **in a structured and readable form by a data processor** (therefore absolutely not in paper format), in a commonly used format ("structured format, commonly used and readable by automatic device").

In compliance with article 20, the interested party has the right to **transmit personal data from one owner to another** "without obstacles".

The data must be provided "without undue delay and, in any case, no later than one month after receipt of the request" (Article 12.3 GDPR).

The portability of data will be guaranteed only if the data processing is based on consent or contractual necessity, and **only if the processing is based on electronic processing** (not paper then), in all other cases it does not apply.

9. Categories of subjects to whom the data can be communicated:

The processing of personal data will be carried out by subjects expressly and specifically designated as specifically instructed persons in charge; these subjects will process the data according to the instructions

received from the Data Controller, according to the operating profiles assigned to them in relation to the functions performed.

The data may also be processed by third parties (outsourcers), which are used for the provision of services related to the purposes pursued, which our organization evaluates from time to time, to ensure greater protection, if you appoint as external managers of the treatments from these existing places.

In all cases, these subjects will process the data in accordance with the instructions received from the Controller, according to operational profiles assigned to them in relation to the functions performed, limited to what is necessary and instrumental for the execution of specific operations within the requested services and exclusively for the achievement of the purposes indicated in this statement.

All data processing operations described in this privacy policy may require that the information collected by VILON be shared with any of our affiliated companies, including foreign companies, and with our partners, our suppliers (eg lenders, shippers, logistics company), consultants, any Joint Venture and any future owner of the site or our business, within the scope of the provision of services requested by You. We may disclose your personal data to other companies in connection with any type of possible or effective reorganization, merger, sale, assignment, transfer or other provisions concerning our business or part of it, assets and shares / units. We may use and / or use the services of other companies or individuals to carry out actions and functions on our behalf, including, for example, providing services, sending correspondence, providing marketing assistance, analyzing data, providing customer support services, for accounting, financial, commercial, administrative and invoicing, legal and tax purposes, etc. In order to carry out the task assigned to them, the individuals or companies mentioned above may process your personal information as data controllers, from we are appointed, or as independent data controllers. We will disclose to such companies or individuals only and only that personal information that is strictly necessary for the specific performance of their functions. Upon specific request, we may cooperate with any court, administrative authority, police authority, or other similar authority in any investigation or proceeding that may affect you or be relevant to the use of the site you are going to make. This collaboration may involve communication to the authorities, upon explicit request, of personal information concerning you.

Please note that this Privacy Policy applies only and exclusively to the personal information that we collect via our site and we can not be held responsible in any way for personal information collected, stored and used by third parties through their sites.

The data will not be subject to dissemination.

10. Data retention period

The collected data will be stored for a period of time not exceeding that necessary for the purposes for which they were collected, to fulfill contractual or pre-contractual obligations, of the law and / or regulation (without prejudice to the statutory and legal terms, in respect for the rights and in compliance with the consequent obligations).

In particular, the criteria used to determine the retention period are established by specific laws that regulate the activity of the Data Controller or by specific provisions of the Guarantor for the protection of personal data that have regulated the processing activity and purposes pursued by the Owner; Finally, it is specified that your personal data may be kept even up to the time allowed by Italian law.

Plugin – **cookies**

The site www.hotelvilon.com, www.hotelvilon.it www.vilon.it owned by VILON can use Plugins provided by third parties.

When you visit a page of our site that contains one or more of these elements, your browser will display content (text and / or images) and / or sent and / or decided by the owner of the Plugin. These plugins could also install cookies (third-party cookies). Therefore, our website is not responsible for such content and therefore, please refer to the privacy information of the owner of the Plugin. Our site may use social plugins from the following, for indicative and non-limiting purposes, social networks: facebook.com ("Facebook"), plus.google.com ("Google+"), microblogging service twitter.com ("Twitter") etc. .. In the future can be inserted other Plugins, other sites and / or Social Network in the pages of our site. Use of Cookies Cookies are small text strings that the sites visited by the user send to his terminal, usually to the browser, where they are stored before being re-transmitted to the same sites on the next visit to the same terminal.

This Internet site, owned by VILON, uses technical cookies.

These cookies do not allow the acquisition of personal identification data of the user.

11. Modification and revocation of consent to the processing of data

The interested party has the right to:

- obtain deletion or transformation into anonymous form or blocking of data processed in violation of the law;
- obtain updating, rectification and integration of data;
- obtain the certification that these operations have been brought to the attention of those to whom data are communicated;
- oppose for legitimate reasons the processing of data or any automated decision-making process (including profiling);
- obtain treatment limitation or portability from another holder.

To this end it will be necessary to send the request, by means of specific communication by e-mail addressed to ivilonsrl@pec.it (specifying in the "Privacy" object) or to Vilon srl, with registered office in Rome at Via Nazionale, 200.

12.

Minors

In the communication of personal data, it must be guaranteed that it is not less than 16 years old, pursuant to art. 8. On this point it is specified that the aforementioned article does not refer to any online processing of data, nor any information society service to which minors can access.

The rule applies only to services that are the subject of direct offer, and in which the processing of data is legitimate only if based on the informed consent of the interested party.

13.

Complaint

to

the

Authorities

The interested party, if he finds possible violations in the processing of data, has the right to lodge a complaint with _____ the _____ competent _____ authorities.

Consent

Having read the information, I consent to the processing of my personal data for the achievement of the above-mentioned purposes.