

**INFORMATION ON THE PROCESSING OF PERSONAL DATA  
of the users visiting the websites of Hotel STRAF**

*Pursuant to Article 13 of the Italian Lgs. Decree 196/03 and EU Regulation 2016/679*

This page contains a description of the policies for managing the website in regards to processing the personal data of the users who visit the site and their privacy. This information is provided pursuant to article 13 of Italian Legislative Decree no. 196/2003 and GDPR 679/2016 – Laws concerning the Protection of Personal Data and the individuals who interact with the web services of Hotel Straf, which is accessible by telematics means through the following web address:

<http://www.straf.it>,

which corresponds to the home page to the home page of the official website of Hotel Straf on Via San Raffaele, 3 - 20121 Milano

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 “Controller” of the personal data collected following a visit to our website or any other data used for providing our services is Lira Spa - Gestione Hotel Straf.

**PLACE WHERE DATA IS PROCESSED**

Data processing pertaining to the web services of this website [physically hosted by Telecom Italia S.p.A., Milano, Via Gaetano Negri 1 ([www.telecomitalia.it](http://www.telecomitalia.it))] 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 Hotel Straf, to whom Lira Spa transmits the data exclusively in order to avoid on-line reservations;
- Persons, companies or professional offices who lend assistance and consulting services to Lira Spa;
- Subjects whose right to access data is recognized by legal provisions or by authorities’ orders.

**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. Lira Spa - Gestione Hotel Straf 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, Design Hotels and his sub data processor Sabre GLOB Inc. with his Reservations Central System SynXis ([www.sabrehospitality.com](http://www.sabrehospitality.com)) with server located in a country outside the EU (USA), to whom elaboration of the reservations is entrusted to, only for online reservations 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***

Lira Spa - Gestione Hotel Straf accept Personal Curriculum Vitae of possible candidates exclusively via electronic 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;

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 pursuant to Chapter IV Section 2 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, after a short period of time and after the talks and after the trial period (90 days) CVs 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, Lira Spa - Gestione Hotel Straf

e-mail: [hr@straf.it](mailto:hr@straf.it)

### **COOKIES**

None of the user's personal data is purposely acquired by the website. Cookies are, in fact, not used for the transmission of information of a personal nature, nor are any kind of persisting cookies used, or rather systems for tracing the user. The use of session cookies (which are not memorized persistently on the user's computer and vanish when the browser is closed) are strictly limited to the transmission of session identification data (made up of causal numbers generated by the server), which is necessary in order to allow safe and efficient exploration of the website. The session cookies used in this website avoid resorting to other informatics techniques that could be potentially un-safe for the user's navigation and do not allow acquisition of the user's personal identification data.

## DATA RETENTION

The processing will be carried out with methods and tools aimed at ensuring the best security and confidentiality, by persons specifically appointed to perform such processing activities pursuant to articles 28 and 29 of the Regulation (EU) 2016/679. 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.

1. Data retention periods depend on the purposes of the processing:
  1. 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;
  2. 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);
  3. data collection for staff recruitment (up to 24 months);
  4. newsletter, marketing or promotional communications in general (until withdrawal of consent);
  5. purpose of di administrative / accounting / financial management: 10 years as as required by law for the conservation of administrative / accounting / financial documentation

## 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 Hotel Straf 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 Lira Spa - Gestione Hotel Straf on Via San Raffaele, 3 - 20121 Milano. The data Protection Coordinator is Mr. Massimo Bruno. You may contact them at any time to exercise your rights as provided for in Section 7 of Law 196/03 and Chapter III GDPR 679/2016, in particular, the right to obtain confirmation as to whether or not personal data concerning him 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 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@straf.it](mailto:privacy@straf.it).

## 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.