 L' ITALIA NEL CUORE	System Documentation GDPR 2016/679	Form	INFOX_00
	STARHOTELS S.p.a. Registered office: VIA F. TURATI, 29 20121 MILAN VAT No. 03360930154	Revision	2 updated 14/10/2022
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Policy pursuant to <u>Art. 13</u> of EU Regulation 2016/679 for "I AM STAR"			

Dear Customer,

Pursuant to Art. 13 of the EU Regulation 679/2016 (hereinafter referred to as GDPR - General Data Protection Regulation) and the legislation on the protection of personal data, the company Starhotels S.p.A. (hereinafter referred to as "Starhotels"), informs you of the processing of your personal data, which will be carried out in compliance with the principles of lawfulness, correctness, transparency, purpose, minimisation, accuracy and limitation of retention.

Data Controller

Pursuant to Art. 4(7) of GDPR 2016/679, the Data Controller is the Company Starhotels S.p.A., with administrative offices in Florence - 50144, Viale Belfiore No. 27. Tel. 055 36921 - fax 055 36924. email: privacy@starhotels.it

Data Protection Officer

Pursuant to Art. 37 of GDPR 2016/679, STARHOTELS S.p.a. has appointed a company Data Protection Officer (DPO), who can be contacted at the following email address: dpo@starhotels.com. Certified email (PEC): starhotels_dpo@legalmail.it

Data Processors

Where necessary for the performance of its institutional activities, Starhotels will identify and formally appoint Data Processors, i.e., in accordance with the provisions of Art. 4(8) of the GDPR, "*natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller*". Data subjects may, at any time, request the updated list of Data Processors from the Data Controller.

Purpose and legal basis of processing

Personal data will be processed by Starhotels in relation to the "I AM STAR" programme and will apply only to customers who are members of the same and in accordance with the following purposes:

- a) management of the programme registration phase and related issue of credentials (user ID and password) for access to the I AM STAR reserved area on the website www.starhotels.com;
- b) periodic communication and provision of benefits (discounts, services, advantages) under the programme on a lasting or occasional basis for specific events;
- c) communication of other advertising and promotional initiatives reserved exclusively for members of the I AM STAR programme implemented by Starhotels, by associated, related, subsidiary, affiliated companies and partners of Starhotels S.p.A. or by third parties commissioned by Starhotels itself.

The purposes indicated will be pursued through the processing of your personal data in accordance with the principles mentioned above. The legal basis, i.e. the condition that makes processing lawful, is the explicit consent given by the data subject in the specific section of the website or on the forms available on the premises (Art. 6(1)(a) of the GDPR).

Categories of data processed and nature of provision

For the pursuit of the described purposes, the following categories of personal data may be processed:

- so-called "common" data (e.g. personal details data, contact data - email, telephone).

The provision of data is optional, therefore, express consent to the processing of data must be given by the Data Subject. Once consent has been given, the Data Subject may, at any time, withdraw it easily and free of charge by contacting the Data Controller directly, who can be contacted at the addresses given above. From that moment on, Starhotels will cease such processing, but this will mean that you will not be able to be promptly updated on new services offered by our company or to take advantage of certain services and benefits reserved for Starhotels customers.


Withdrawal of consent does not affect the lawfulness of processing based on the consent originally given.

Data processing methods

Personal data will be processed using computerised and analogue means by duly authorised, instructed and trained personnel.

Starhotels guarantees the application of appropriate security measures to reduce the risk to which data may be exposed.

Data retention times

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In accordance with the principles of proportionality and necessity, data will be processed until the customer requests to be removed from the "I AM STAR" programme.

Recipients and dissemination of personal data

The data collected will be processed exclusively for the above-mentioned purposes and, subject to the customer's consent, may be communicated to subsidiaries, affiliates or otherwise associated companies of the Starhotels Group, both in Italy and abroad and exclusively for the management of services offered to Starhotels customers with the "I AM STAR" programme.

Furthermore, your data may be communicated, always in compliance with appropriate security measures, to public authorities and private parties for the fulfilment of specific legal obligations, including those of a fiscal, administrative and financial nature. Personal data will not be disseminated.

Place of data processing and areas of transfer

The data are processed at the headquarters of the Data Controller and at the Data Processors specified in the list held by the Data Controller.

Personal data will be processed within the Italian territory or in any event within the European Union and will not be subject to transfer to non-EU countries or International Organisations.

If, during the course of the relationship, a transfer should become necessary, the data controller guarantees compliance with the provisions of Chapter V of the GDPR.

Rights of the data subject

The Data Controller guarantees the exercise of the rights set out in articles 15 et seq. of the GDPR, in particular:

1. Right of access;
2. Right of rectification;
3. Right to erasure (so-called right to be forgotten);
4. Right of restriction of processing;
5. Right of portability;
6. Right of opposition.

In the event that the personal data relates to deceased persons, the aforementioned rights may be exercised, in accordance with the provisions of Art. 2-terdecies of Legislative Decree 101/2018, by those who have an interest of their own, or are acting to protect the data subject, in their capacity as their representative, or for family reasons worthy of protection.

Requests regarding the exercise of rights should be addressed to the Data Controller at: privacy@starhotels.it.

Automated processing and profiling

The data controller does not carry out automated processing, including profiling.

Right to complain and protection of the data subject

Finally, we would like to remind you that if you feel that your privacy rights have been violated, you have the right to lodge a complaint with the Italian Data Protection Authority, with headquarters at Piazza Venezia 11, 00187 - Rome, Tel. (+39) 06 696771, email: protocollo@gpdp.it, Certified email (PEC): protocollo@pec.gpdp.it.