



MAISON SENATO

INFORMATION ON THE PROCESSING OF PERSONAL DATA CUSTOMERS

Subject: Information on the processing of personal data in accordance with Article 13 of Regulation (EU) 2016/679

Dear Client,

Pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter “GDPR” or “Regulation”) - we inform you that the personal data relating to you and to - any - other persons staying with you, provided by you to our Company, prior to the beginning of your stay and during the same (hereinafter “Data”), will form the subject, in compliance with the aforementioned legislation and in accordance with the obligations of confidentiality that inspire the activity of our Company, of the processing referred to in Art. 4 of the GDPR. In particular, we wish to inform you of the following:

a. Data relating to the Data Controller

The Data Controller is Diomede S.r.l. (hereinafter referred to as “Company” or “Structure”) based in Milan, Via San Giuseppe Cottolengo n. 15, zip code 20143, Italy.

b. Purposes and Legal Bases

The collection and processing of Data referred to you is carried out in order to allow our Facility to perform the following activities:

1. fulfillment of legal obligations under Italian law (in particular for purposes of registration and communication to the State Police in accordance with Article 109 of the TULPS - Testo Unico delle Leggi di Pubblica Sicurezza);

2. Invoicing and administrative accounting.

Legal basis legitimizing the aforementioned processing is the execution of a legal obligation, pursuant to Article 6, paragraph 1, letter c) of the GDPR;

3. Management of the residence contract and collateral services that you may request.

Legal basis legitimizing the processing is the execution of contractual measures, pursuant to Art. 6, paragraph 1, lett. b) of the GDPR.

4. Marketing activities by the Facility to deliver you commercial communications containing information and offers related to our services;

5. Collection of your preferences in order to provide you with a personalized service during the period of your stay and on the occasion of your future bookings at our Facility.

The legal basis legitimizing the processing is the consent given by the data subject, pursuant to Article 6(1) (a) of the GDPR.

Your Personal Data will be processed by authorized personnel in accordance with Article 29 of the GDPR.

The processing of your Data for said purposes will take place using computer and manual methods, according to logical criteria compatible with and functional to the purposes for which the Data were collected, in compliance with the rules of confidentiality and security provided for by law and the Company's internal regulations. Some Data may also be processed on behalf of the Company by third companies,

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entities or professionals who, as outsourced Data Processors, perform specific processing services or activities complementary to ours.

c. Categories of recipients of Personal Data

The Data, or some of the Data, may be disclosed to the following persons or entities that for this purpose may carry out processing operations as autonomous controllers or on our behalf:

1. public security authorities for the registration of attendance;
2. consultants and freelancers, including in associated form;
3. payment institutions;
4. providers of ancillary services.

The Data will not be disseminated in any way.

d. Transfer of Personal Data to a Third Country

Your Data will not be transferred outside the European Union.

e. Retention Period

Your Personal Data will be retained for the duration of your stay and thereafter for no longer than 12 years after the end of your stay, depending on the different purposes legitimately pursued and the retention periods for each of them provided. After two years from the end of your stay, the Data will be destined for retention only, discontinuing the data processing referred to in purposes 4. and 5. above - unless otherwise indicated by you, including through the renewal of consents, if issued.

f. Rights of the Interested Party

Current legislation grants the Interested Party numerous rights that we urge you to consider carefully. These include the rights to:

1. Access to the following information:
 - a. purpose of processing,
 - b. categories of personal data concerned,
 - c. recipients or categories of recipients to whom such personal data have been or will be disclosed, particularly if recipients in third countries or international organizations,
 - d. existence of the data subject's right to request from the data controller the rectification or erasure of personal data or restriction of the processing of personal data concerning him or her or to object to their processing.
2. Rectification, by which is meant:
 - a. correction of inaccurate personal data concerning him/her without justified delay,
 - b. supplementation of incomplete personal data, including by providing a supplementary statement.
3. Deletion of data concerning him/her without undue delay, if:
 - a. the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
 - b. a revocation of consent is formulated and there is no other legal basis for the processing,
 - c. you object to the processing and there is no overriding legitimate reason for processing,
 - d. personal data have been processed unlawfully,
 - e. personal data must be deleted to fulfill a legal obligation,



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f. personal data have been collected in connection with the provision of information society services;

4. Limitation of processing:

- a. where the accuracy of personal data is contested, for the period necessary for the data controller to verify the accuracy of such personal data
- b. when the processing is unlawful and the data subject objects to the erasure of the personal data and instead requests that its use be restricted,
- c. when the personal data are necessary to the data subject for the establishment, exercise or defense of a legal claim, although the data controller no longer needs them for the purposes of the processing,
- d. where you object to the processing under the right to object;

5. Receive notification in case of successful rectification or deletion of personal data or restriction of processing.

6. Data portability, i.e., the right to receive in a structured, commonly used and machine-readable format personal data concerning you and you have the right to transmit such data to another data controller if:

- a. the processing is based on the express consent of the data subject for one or more specific purposes or takes place by reason of a contract signed with the data subject; and
- b. the processing is carried out by automated means;

7. Object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her.

To exercise the rights indicated, it is possible to write an email to privacy@maisonsenato.com or a registered letter to the Data Controller. The Regulations also provide for the data subject's right to lodge a complaint with the Data Protection Authority or take appropriate legal action.

g. Compulsory or optional nature of the provision of Data and consequences

The provision of personal data for the purposes of letter b. numbers 1., 2. and 3. is strictly necessary. Consent for the activities referred to in letter b. numbers 4. and 5. relates only to personal data related to you and is optional; it will not prevent you from using the services of our Facility. We reiterate that at any time you may revoke the consent given without affecting the legitimacy of the processing carried out up to that moment..