

## INFORMATION TO DATA SUBJECTS REGARDING THIS WEBSITE

### GRAND HOTEL PALACE ROMA

This page will describe management of our web site as regards processing the personal data of users that visit us. This information is provided - also in pursuance of Section 13 of Legislative Decree no. 196/2003 - to any entity having to do with the web-based services that are made available by the Grand Hotel Palace via electronic networks as from the following address: [www.grandhotelpalacerome](http://www.grandhotelpalacerome) which corresponds to the home page of our official web site.

The information provided only applies to our web site and does not concern any web sites that may be visited by an user via external links. The information provided is also based on the guidelines contained in Recommendation no. 2/2001, which was adopted on 17 May 2001 by the European data protection authorities within the Working Party set up under Article 29 of European Directive 95/46/EC in order to lay down minimum requirements for the collection of personal data online - especially with regard to arrangements, timing and contents of the information to be provided by data controllers to users visiting web pages for whatever purpose. The above Recommendation as well as a summary of its purposes can be found in another section of this site.

### DATA CONTROLLER

Visiting this site may result into the processing of data concerning identified or identifiable persons. The data controller is Millennium Hotels Palace Management Srl, Via Vittorio Veneto, 70 - 00187 Roma, company submitted to management and coordination activity from ("M&C").

### DATA PROCESSOR

The company dgNet S.r.l. Via dei Cairoli n. 41, 50131 Firenze, has been appointed responsible for processing in accordance with Article 29 of the Privacy Code, as in charge of the maintenance of the technological part of the web site.

### PLACE WHERE DATA IS PROCESSED

The processing operations related to the web-based services that are made available via this website [physically "hosted" by the DgNet Internet Solutions ("http://www.dgnet.it/")] are carried out at the aforementioned office of the Grand Hotel Palace exclusively by technical staff in charge of said processing, or else by persons tasked with such maintenance activities as may be necessary from time to time.

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 Millennium Hotels Palace Management Srl, Grand Hotel Palace to whom Millennium Hotels Palace Management Srl transmits the data exclusively in order to avoid on-line reservations, including the Millennium & Copthorn Hotels chain which the Grand Hotel Palace is part;
- Persons, companies or professional offices who lend assistance and consulting services to Millennium Hotels Palace Management Srl, Grand Hotel Palace concerning accounting, administrative, legal, financial and tax matters;
- Subjects who are authorized to have access to the data by law or through requests by the authorities;

### CATEGORIES OF PROCESSED DATA

#### *Navigation 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 Provided Voluntarily by Users*

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 messages.

Data will be retained only for reservations, registration request to send the newsletters and / or special offers, and will not be disclosed to anyone.

Specific summary information notices will be shown and/or displayed on the pages that are used for providing services on demand.

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. Grand Hotel Palace 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. 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*

The Millennium Hotels Palace Management Srl accept Personal Curriculum Vitae of possible candidates via mail and e-mail. 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, within the limits set by the General Authorisations of the Garante no. 1 and 2 of December 12, 2013 (Published in the Official Gazette no. 302 of December 27, 2013);

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 minimum security measures ex Annex "B " of the Code. 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 (60 days) CVs will be deleted from the PC and, if printed, they will be destroyed.

To provide Curriculum Vitae use the following address:

*Human Resources Dpt, Millennium Hotels Palace Management Srl, Via Aurora 39, 00197 – Roma*

#### *Cookies*

### **COOKIES & JAVASCRIPT TECHNOLOGIES**

In this website we are applied cookies technologies for different purposes, including computer technology authentication or to monitor sessions, and to store specific technical information regarding the users that access the server of dgNet, the website maintenance.

#### ***Description of the cookie mechanisms adopted:***

- Cookie implanted in the user/contracting party's terminal directly (that will not be used for other purposes) such as session cookies used for on-line booking on the website, authentication or customisation cookies (for example, the choice of the browsing language); these cookies remain active only for the duration of the session.
- Cookie used to statistically analyse accesses/site visits (the so-called "analytic" cookie) that are used for statistical purposes, and to collect aggregate information without the possibility of tracing back to the identification of the individual user personal computer. In these cases, since current legislation requires that, when using analytic cookie, the user is given clear and adequate instructions to easily oppose implementation of such (including any mechanisms to make the

cookies anonymous), we give instructions on how to disabled installed cookies below. The duration of analytic technical cookie is averagely of 30 minutes.

#### *How to modify settings on the cookies*

Most browsers allow to clear cookies from your computer hard drive, block acceptance of cookies or receive a warning before a cookie is stored.

Therefore, to remove cookies we encourage you to follow the instructions on the pages of the most used internet browsers:

Chrome: <https://support.google.com/chrome/answer/95647?hl=it>

Fire fox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>

Internet Explorer: <http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9>

Safari: [http://support.apple.com/kb/HT1677?viewlocale=it\\_IT](http://support.apple.com/kb/HT1677?viewlocale=it_IT)

#### **“Third-party” cookies**

Third-party cookies are code parts set by a website different than the website you are currently browsing.

This involves the transmission of cookies from third parties. In this website is carried out the Google analytics technology for statistical monitoring of the website visits and Adobe scripts for monitoring of the website reservations. This technology use a tracking code that sets third party cookies and javascript files lingering on each visitor's computer. In addition to transmitting information to a Google and Adobe servers, these cookies store information such as whether the visitor has been to the site before (new or returning visitor), the timestamp of the current visit, and the referrer site or campaign that directed the visitor to the page. It is possible, in these cases, the possibility of tracing back to the identification of the individual personal computer user.

The privacy policies available on the websites described above. Visitors in any case can turn off the advertising features of Google Analytics on this site by installing the Add-off for your browser downloadable from this [LINK](#).

More google analytics privacy policies available on <http://www.google.com/policies/technologies/ads/>

More Adobe cookies policies available on <http://www.adobe.com/it/privacy/cookies.html>

#### **Embedded content (Third party cookies)**

- Millennium Hotels Palace Management Srl sometimes uses Youtube videos from social content like Twitter, Facebook, Google+ and possibly embeddable content from other platforms. The specifications of the "How to reach us" web page in addition retrieve data from Google Maps. Millennium Hotels Palace Management Srl cannot control these third party cookies and for this is it possible to contact any third party to have more control over these cookies. A few links to the privacy policy of third party cookies:

- Facebook
- Twitter
- Youtube
- Google+
- Vimeo

Nevertheless, if you block or erase cookies, it may not be possible to reset previously specified preferences or customised settings, and our capacity to customize the user experience will be limited.

#### **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 Grand Hotel Palace 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

Data subjects are entitled at any time to obtain confirmation of the existence of personal data concerning them and be informed of their contents and origin, verify their accuracy, or else request that such data be supplemented, updated or rectified (Section 7 of Legislative Decree no. 196/2003). The above Section also provides for the right to request erasure, anonymisation or blocking of any data that is processed in breach of the law as well as to object in all cases, on legitimate grounds, to processing of the data.

All requests should be emailed to [privacy@grandhotelpalacerome.com](mailto:privacy@grandhotelpalacerome.com) or sent to: Grand Hotel Palace, Via Vittorio Veneto, 70 – 00187 Roma.

### P3P

This privacy notice can be viewed in automatic format by means of the most recent browsers implementing the P3P (Platform for Privacy Preferences Project) standard as proposed by the World Wide Web Consortium ([www.w3c.org](http://www.w3c.org)).

All efforts will be made to ensure the highest interoperability between the functions of this site and the automatic privacy verification mechanisms that are made available by some software products applied by users.

Bearing in mind that the current development status of automatic verification mechanisms is such as not to allow ruling out errors and malfunctioning, it is hereby specified that this document as posted at

[http://www.grandhotelpalacerome.com/pdf/millennium\\_privacy\\_en.pdf](http://www.grandhotelpalacerome.com/pdf/millennium_privacy_en.pdf)

is the privacy policy of this site and will be updated as necessary.