








**PRIVACY POLICY**

**Pursuant to and for the purposes of Article 13 of Regulation (EU) 2016/679 (GDPR) for the processing of personal data collected through the "Hotel Reservation" form.**

	<p><b>WHO IS THE DATA CONTROLLER? HOW CAN I CONTACT HIM?</b> The Data Controller is <b>UCIMU-SISTEMI PER PRODURRE SPA</b>, with its registered office at Viale Fulvio Testi 128 – 20092 Cinisello Balsamo – Milan, represented by its pro-tempore Legal Representative, who can be contacted for any information via email: <a href="mailto:privacy@ucimu.it">privacy@ucimu.it</a>, Phone: 02262551], PEC: <a href="mailto:ucimu@legalmail.it">ucimu@legalmail.it</a>.</p>
	<p><b>2. MAIN DEFINITIONS</b> <b>Personal data:</b> any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity.</p>

**3. PURPOSE OF PROCESSING, LEGAL BASIS, DATA RETENTION, NATURE OF CONFERRAL**

	 <b>PURPOSE OF PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>DATA RETENTION</b>	 <b>NATURE OF CONFERRAL</b>
A)	<p><b>Filling of the hotel reservation form and management of the reservation at the hotel"</b></p>	<p>The processing is necessary for the execution of pre-contractual measures taken at the request of the data subject (C44). Article 6(1)(b) of the GDPR.</p>	<p><b>10 years.</b>  Article 2220 of the Civil Code, unless issues of a contractual and non-contractual nature arise, and unless different legal obligations apply.</p>	<p>The provision of personal data is necessary for pre-contractual purposes.  In case of non-provision of the necessary personal data, it will be impossible to manage the hotel reservation.</p>
B)	<p><b>Collection of particular persona data provided by the data subject (in case of food intolerances or specific diets). Such data will be communicated to the hotel</b></p>	<p>The processing is based on the consent to the processing of personal data (C42, C43). Article 6(1)(a) of the GDPR.</p>	<p>Until the revocation of consent (or opt-out)</p>	<p>The provision is optional.  In case of non-provision of the data, it will not be possible to proceed as requested.</p>
C)	<p><b>Management of the data subject's requests regarding personal data protection and requests from other data subjects, pursuant to Articles 15 et seq. of the GDPR (rights of the data subject).</b></p>	<p>The processing is necessary to comply with a legal obligation to which the data controller is subject (C45). Article 6(1)(c) of the GDPR.</p>	<p>5 years from the closure of the request, unless there are disputes</p>	<p>The provision of personal data is mandatory, as it is essential to comply with legal obligations.</p>

	<p>Personal data will be communicated to subjects who will process them as autonomous Data Controllers or Data Processors (Article 28 GDPR) and handled by individuals (Article 29 GDPR) acting under the authority of the Data Controller and Processors based on specific instructions regarding the purposes and methods of processing. The data will be communicated to recipients in the following categories:</p> <ul style="list-style-type: none"> <li>• Group companies, based in EEA countries;</li> <li>• Entities, based in Italy, that manage/support/assist, even occasionally, the Data Controller in the administration of the Information System and telecommunication networks (including email, websites, and/or web platforms);</li> <li>• Entities, based in Italy, required by current accounting and tax regulations to receive mandatory communications;</li> <li>• Banking and equivalent institutions, based in Italy;</li> <li>• Hotels, affiliated hotel structures, restaurants;</li> <li>• Firms or Companies, based in Italy, in the context of tax assistance and administrative/accounting management services;</li> <li>• Competent Authorities for fulfilling legal obligations and/or requests from public bodies.</li> </ul>
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	<p>Personal data will also be communicated to SOFIMU Srl, for supporting the Data Controller in organizing the EVENT. The list of Data Processors (Article 28) is available by writing to <a href="mailto:privacy@ucimu.it">privacy@ucimu.it</a>.</p>
	<p><b>5. DATA TRANSFERS</b> Personal data will not be transferred to third countries outside the EEA.</p>
	<p><b>6. AUTOMATED-MEAN PROCESSES?</b> Personal data will be subjected to traditional and manual, electronic or automated processing. Fully automated decision-making processes are not carried out.</p>
	<p><b>7. DATA SUBJECTS' RIGHTS</b> Data subjects may exercise their rights as outlined in Articles 15 and following of the GDPR by contacting the Data Controller at the email address: <a href="mailto:privacy@ucimu.it">privacy@ucimu.it</a>, or by writing to the contact details provided above. The Data Controller guarantees data subjects the right to request, at any time, access to their personal data (Article 15), rectification (Article 16), deletion (Article 17), or restriction of processing (Article 18). The Data Controller will communicate (Article 19) to each recipient to whom personal data has been transmitted any rectifications, deletions, or restrictions of processing that have been carried out. The Data Controller will inform data subjects who request such information about these recipients. The Data Controller guarantees the right to data portability (Article 20) and, in the case of requests under Article 20, will provide data subjects with their data in a structured, commonly used, and machine-readable format. Data subjects have the right to withdraw their consent at any time, without affecting the lawfulness of processing based on the consent given prior to the withdrawal. If data subjects believe that their personal data is being processed by the Data Controller in violation of the provisions of Regulation (EU) 2016/679, they are free to lodge a complaint with the national supervisory authority, particularly in the Member State in which they normally reside or work, or where the alleged violation of the Regulation has occurred (Garante Privacy <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>), or to seek appropriate judicial remedies.</p>
	<p><b>8. UPDATES</b> The controller may change, modify, add, or remove any part of this Privacy Policy. To facilitate the verification of any changes, the Policy will include the date of the last update.</p>

Date of update: 02.12.2024

**The Data Controller  
UCIMU-SISTEMI PER PRODURRE SPA**

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**Pursuant to and for the purposes of Articles 13 and 6 of Regulation (EU) 2016/679 (GDPR)**

The undersigned (first name and last name) \_\_\_\_\_

declares:

to have read the above privacy policy regarding the processing of personal data

and

with regard to the purpose referred to in letter B) (**only in case of providing special categories of data**)

Consents to the processing      Signature for consent \_\_\_\_\_

Does not consent to the processing      Signature for non-consent \_\_\_\_\_

Date, \_\_\_\_\_