



TURIN PALACE

A TRUE STAY HOTEL

INFORMATIVA PRIVACY AI SENSI DELL'ART. 13 DEL REGOLAMENTO UE 2016/679 (GDPR)

This notice is a general obligation that must be fulfilled before or, at the latest, at the time personal data are directly collected. In the case of personal data not collected directly from the data subject, the notice must be provided at the time of the first communication to the data subject. Therefore, pursuant to the General Data Protection Regulation for the protection of natural persons (GDPR – Reg. (EU) 2016/679), the undersigned organisation, as Data Controller, provides the following information.

1. Data Controller

The Data Controller is Turin Palace Hotel srl, headquartered at Via Paolo Sacchi 8 – 10128 Turin (TO) – Italy, contactable at info@turinpalacehotel.com or +39 011 0825321.

2. Type of Data Processed

The personal data held by the undersigned organisation are collected directly from the clients concerned, freely provided by them, and from third parties (persons exercising parental responsibility or legal guardianship over minors). In general, the personal data processed include:

- . identification and contact details (e.g. name, surname, address, telephone number, e-mail);
- . banking/payment details (if required);
- . special categories of personal data, relating to health conditions, necessary to assess suitability for treatments (if voluntarily provided by the data subject);
- . declarations included in the “Self-Declaration Form for the Use of the Wellness Centre Services”.

3. Purpose of Processing and Legal Basis

The personal data collected will be processed for the following purposes:

- a) purposes strictly connected to the performance and provision of the requested services, including but not limited to the management of bookings and access to the Wellness Centre, assessment of health conditions for access to treatments and facilities, etc. (Art. 6(1)(b) and Art. 9(2)(a) GDPR);
- b) administrative and accounting management of the requested services, as well as compliance with civil, tax and accounting obligations (Art. 6(1)(c) GDPR);
- c) compliance with legal obligations and requirements issued by legally authorised authorities, and obligations under the internal regulations for access to the Wellness Centre (Art. 6(1)(c) GDPR);
- d) for the establishment, exercise or defence of legal claims in judicial or extrajudicial proceedings (legitimate interest) of the organisation (Art. 6(1)(f) and Art. 9(2)(f) GDPR), e.g. in the event of disputes or claims for damages.

La base giuridica del trattamento è l'esecuzione di un contratto (art. 6 co. 1 lett. b) del GDPR), l'adempimento di obblighi legali (art. 6 co. 1 lett. c) del GDPR). Per quanto riguarda il trattamento dei dati appartenenti a categorie particolari, relativi allo stato di salute, il trattamento avviene esclusivamente con il consenso esplicito dell'interessato (art. 9 co. 2 lett. a) del GDPR).



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4. Consequences of Refusal to Provide Data

Providing personal data is optional except for data indispensable for fulfilling the purposes referred to in letters b) and c). Should the data subject fail to provide the necessary data or deny consent for processing, it will not be possible to proceed with the provision of the requested services and communications.

If the required data, including special categories of health-related data, are not provided, access to the requested services cannot be guaranteed.

5. Methods of Processing

Data will be processed in paper and/or electronic form, according to logic strictly related to the stated purposes and in any case ensuring security and confidentiality. Personal data will be processed in compliance with Art. 5 of EU Regulation 2016/679, which requires, among other things, that data be processed lawfully, fairly and transparently, collected for specified, explicit and legitimate purposes, accurate and, if necessary, updated, relevant and limited to what is necessary, and handled with respect for the rights and dignity of the data subject, with appropriate protection and security measures.

6. Data Retention Period

Personal data will be retained for the time necessary to achieve the purposes described above and in compliance with legal obligations (e.g. fiscal and accounting requirements). Special categories of personal data, relating to health conditions, will be retained only for the time strictly necessary to provide the requested services.

7. Data Recipients

Data (only what is strictly necessary) may be disclosed to:

- . persons authorised and data processors, both internal and external to the organisation, who perform specific tasks (e.g. staff in charge of service access, administrative and tax consultants, etc.);
- . subjects to whom disclosure is required by law.

Data will not be disseminated not transferred outside the EU.

8. Rights of the Data Subject

At any time, the data subject may exercise their rights (access, rectification, erasure, restriction, portability, objection, absence of automated decision-making) where applicable, pursuant to Articles 15–22 GDPR; submit a complaint to the Data Protection Authority (www.garanteprivacy.it); and, where processing is based on consent, revoke such consent at any time, without affecting the lawfulness of processing prior to revocation.

9. Contact Details for Exercising Rights

To exercise their rights, the data subject may send a written request to the Data Controller at the contact details indicated above.