



## Privacy Policy for Website Navigation

### Preamble

Co-Hotel S.R.L. – Hotel Madison

TAX CODE / VAT NUMBER: IT16878251004

REGISTERED OFFICE ADDRESS: VIA PALERMO, 67 - 00184 - ROME (RM)

LEGAL REPRESENTATIVE AND DATA CONTROLLER: RIBACCHI FILIPPO

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Co-Hotel S.R.L. – Hotel Madison

a company belonging to the BZAR Hotels group operating in the hospitality sector, is distinguished by professionalism and excellent hospitality inspired by Italian simplicity. As Data Controller, we wish to inform users about the collection and processing of personal data arising from browsing the website.

### What personal data do we collect?

As the Data Controller, Co-Hotel S.R.L. – Hotel Madison collects the following personal data:

- User identification data, such as IP addresses and domain names of the user's computer.
- Data related to website usage, collected via technical and third-party analytical cookies.
- Data voluntarily provided by users, such as identifying information submitted to access certain services offered through the website (please refer to the relevant privacy notices in sections like "Contact Us").

### About cookies:

Cookies are text files automatically generated on a user's device when visiting certain pages of the website.

Some cookies (session cookies) are automatically deleted when the browser is closed.

Other cookies may remain on the user's computer (e.g., to allow automatic login to the reserved area, the user can choose to save their User ID and password in



one of these files).

Another category includes analytical cookies, used to collect aggregated information about the number of users and how they visit the website. These cookies may be installed by the site operator or by a third party via the site (so-called third-party analytical cookies).

If users prefer not to receive cookies, they can disable them through their web browser settings. However, certain parts of the website may not function properly if cookies are disabled.

### **For what purposes do we use your personal data?**

Co-Hotel S.R.L. – Hotel Madison processes personal data for the following purposes:

- To ensure proper use and operation of the website.
- To analyze website usage for statistical purposes.
- To detect any unlawful activity by users that may harm third parties or the company itself.
- To comply with applicable European and national laws, as well as requirements from data protection authorities.

### **Why is this data processing legitimate?**

The data processing carried out by the Controller is lawful under Article 6(1)(a) of the GDPR, as it is based on the user's consent given while navigating the website.

### **How do we process your data and how long is it retained?**

Your data is processed both in paper form and electronically (e.g., servers, cloud databases, application software, etc.).

Co-Hotel S.R.L. – Hotel Madison retains your personal data based on criteria linked to the specific purpose of collection and legal limitation periods.

Details about retention times for each category of data are available on the website.

### **Who can access your personal data?**

Within Co-Hotel S.R.L. – Hotel Madison, personal data is accessible only to employees and collaborators who need it in order to provide the requested services. Access is limited to only the strictly necessary data. This includes:



- Administrative staff.
- Sales department personnel.
- Production and order management personnel.
- Marketing operations personnel.

All personnel are informed and trained to maintain strict confidentiality in data processing, in line with our ethical code. The company takes all necessary steps to ensure awareness of data protection responsibilities.

### **Disclosure to third parties**

Personal data will not be disclosed publicly. It may be shared with technological, IT, or consultancy service providers who typically act as Data Processors. This may also include group companies that provide services to the Data Controller. Data will be processed in line with the data minimization principle, favoring anonymized or anonymous data where possible.

Third-party recipients may include:

- Group companies and external providers offering technical or organizational services on behalf of the Data Controller, including IT support or service management.
- Third-party autonomous data controllers such as public authorities or law enforcement agencies, when legally required and in the exercise of their functions.

### **Service Providers**

Co-Hotel S.R.L. – Hotel Madison shares personal data with certain service providers who assist in the delivery of services.

Where third parties access data, they do so in accordance with applicable data protection laws and under the instructions of Co-Hotel S.R.L. – Hotel Madison as the Data Controller.

### **Legal Requirements**

Your personal data will not be shared with third parties without your express consent, unless required by law or an authority.

### **Is your data transferred abroad?**



Your data is processed within the European Union.

If international data transfers are required, they will be managed using the appropriate safeguards under the GDPR, including:

- Adequacy decisions by the European Commission.
- Standard Contractual Clauses (SCCs) issued by the European Commission, with any supplementary measures as recommended by the EDPB.

### **What are your rights as a data subject and how can you exercise them?**

Under the EU General Data Protection Regulation (2016/679), you have the following rights:

- Right of access: To receive a copy of your personal data held by us.
- Right to rectification: To update or correct your data if inaccurate or outdated.
- Right to object to data processing for marketing purposes: To stop receiving marketing communications at any time.
- Right to object to automated decision-making: Including profiling-based decisions.
- Right to withdraw consent: At any time, without affecting the lawfulness of prior processing.
- Right to lodge a complaint with the Data Protection Authority if you have concerns.
- Right to erasure ("right to be forgotten"): If:
  - the data is no longer necessary for the original purpose,
  - consent has been withdrawn, and no other legal basis applies,
  - the data was processed unlawfully,
  - the data must be erased to comply with legal obligations.
- Right to object to specific processing activities.
- Right to restrict processing.
- Right to data portability: To receive your data in a structured, machine-readable format and transfer it to another controller.

To exercise your rights, please send an email to [dpo@hideea.com](mailto:dpo@hideea.com), specifying your request and providing sufficient identification information (including a copy of your ID).

Co-Hotel S.R.L. – Hotel Madison will respond within one month. If we are unable to fulfill your request, we will explain the reasons in detail.



### **How can you contact us?**

This privacy notice is intended to inform users about the personal data collected by Co-Hotel S.R.L. – Hotel Madison and how it is processed. For any questions or clarifications, please contact: [dpo@hideea.com](mailto:dpo@hideea.com)