



## PRIVACY POLICY FOR THE WEBSITE

07/11/2024  
Cod. 2.4 Bis  
Rev. 00

## PRIVACY POLICY FOR THE WEBSITE Pursuant to EU Regulation/2016/679 (GDPR)

**Nota:** Il contenuto del presente documento va riportato nel sito web aziendale.

### INFORMATION ON THE PROCESSING OF PERSONAL DATA

This page describes the privacy policy of <https://www.hotelvillaschuler.com>. For further clarification regarding the Policy on the Processing of User Data, please consult the appropriate page.

This page describes how the site is managed with regard to the processing of personal data of users who consult it. This information is intended for all users who interact with the web services of HOTEL VILLA SCHULER S.R.L.. You are therefore asked to pay special attention to the following Information Notice, bearing in mind that it:

- Specifically responds in accordance with Article 13 of the EU Regulation 679 of 2016 for the protection of personal data, accessible by electronic means from the address <https://www.hotelvillaschuler.com>, corresponding to the home page of this site.
- The information applies only to the official website of HOTEL VILLA SCHULER S.R.L. and not to other websites that may be consulted via links.
- The information is inspired by the most reliable codifications regarding the requirements for the collection of personal data online (the manner, timing and nature of the information that data controllers must provide to users when they connect to web pages, regardless of the purposes of the connection, recommended and/or suggested by the EEC directives (art. 29 of Directive No. 95/46/EC).

### THE DATA CONTROLLER

Following consultation of this site, data relating to identified or identifiable persons may be processed. The "Owner" of their processing is the Legal Representative of the Company:

*Mr. Gerhard Schuler*  
*Scesa Bastione, 2, 98039 – Taormina (ME)*  
*Tel. +39 0942 23481 – [info@hotelvillaschuler.com](mailto:info@hotelvillaschuler.com)*



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### THE DATA PROTECTION OFFICER

In accordance with the provisions of EU Regulation 2016/679, HOTEL VILLA SCHULER S.R.L. has appointed a Person in charge of the protection of personal data, including those related to the company's website. This appointed Manager is:

*Mr. Gerhard Schuler*

*Scesa Bastione, 2, 98039 – Taormina (ME)*

*Tel. +39 0942 23481 – info@hotelvillaschuler.com*

### THE PLACE OF DATA PROCESSING

The processing operations related to the web services of this website take place at the above-mentioned offices of HOTEL VILLA SCHULER S.R.L. and are carried out exclusively by technical personnel in charge of processing. No data deriving from the web service is communicated or disseminated. The personal data provided by users who submit requests to receive informative material (for example: periodicals, newsletters, reports, answers to questions, acts and measures, etc.) are used for the sole purpose of performing the service or provision requested and are communicated to third parties only if necessary.

### TYPE OF DATA PROCESSED AND PURPOSE

#### Navigation Data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes:

- The IP addresses or domain names of the computers used by users who connect
- The addresses in URI (Uniform Resource Identifier) notation of the resources requested
- The time of the request
- The method of connection
- The size of the files generated by the network traffic
- Other parameters related to the user's operating system and computer environment

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The



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data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: except for this possibility, at present the data on web contacts do not persist for more than seven days.

### Data voluntarily provided by the user

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site entails the necessary acquisition of the sender's address and any other personal data freely provided by the sender, which is necessary for HOTEL VILLA SCHULER S.R.L. to reply to requests. Specific summary information documents will be contingently proposed and/or displayed, on related pages of the site, for particular services, upon request, described elsewhere.

## COOKIES

### What is a "cookie"

A cookie is a short text sent to your internet browsing program (browser) from the site you visit that allows it to store information about your visit, such as your preferred language. This makes your next visit easier and increases the usefulness of the site to you by playing an important role; without them, using the web would be a much more difficult experience.

For more information about cookies, we recommend visiting the web page provided on the Privacy Guarantor's website or the AboutCookie.org website (in English).

### How they are used

As displayed in the opt-in message that is displayed when you open our website, it is not necessary to submit any explicit consent to use our services since it is sufficient to continue browsing to implicitly accept the sending of cookies to your browsing system (as established by the Privacy Guarantor himself with text published in the Official Gazette 126 of June 3, 2014).

This website uses the following types of cookies:

### Essential cookies

They are essential to enable one to move throughout the site and fully use its features without technical problems, such as accessing the various protected areas of the site. Without them some necessary services cannot be enjoyed.



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### Performance cookie

They collect information about how users use a website, for example which pages are visited most; however, they do not collect information that identifies the visitor as all data collected is aggregated and therefore anonymous. They are used only to improve the operation of a website through the study of statistical data.

### Functionality and technical cookies

They allow the site to remember choices made by the user and provide advanced customized functionality; they can also be used to remember changes made to text size, fonts, and other parts of web pages that you can customize. They may also be used to provide requested services, such as watching a video; information collected by this type of cookie may be anonymized.

This website does not track the behavior of its browsing users outside its Internet domain.

### How to manage cookies on your PC

For cookie management on your browser, see the documentation prepared by the manufacturer. All browsers also have an “incognito” browsing mode where no browsing track is kept and all cookies are rejected by default. In addition, it is possible to express your will toward the various tracking companies at any time and from any location via the website of the European Interactive Digital Advertising Alliance, YourOnlineChoices.eu.

## **ADDITIONAL SERVICES**

### Google Analytics

This website uses Google Analytics services provided by Google, Inc. (“Google”) for statistical purposes. This information will be transmitted to and stored on Google's servers in the United States for the purpose of examining your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data, which in any case is anonymized at the time of transmission. You can completely prevent Google from collecting cookies related to your use of this website and processing such data by downloading and installing the appropriate official browser plug-in.

By using this website, you consent to the processing of your data by Google in the manner and for the purposes stated above.



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### Other services

There may be other services on this website in a minor form, whose function is limited to simply linking to an external function. For example, sharing on social networks such as Twitter and Facebook, or watching a video through an integrated YouTube player.

No record is kept of these kinds of activities, whose only function is to provide more information and a broader social and multimedia user experience.

### **FREEDOM TO PROVIDE DATA**

The user is free to provide the personal data indicated in the request forms to HOTEL VILLA SCHULER S.R.L. or however indicated in contacts for communications. Failure to provide them may result only in the impossibility of obtaining what has been requested.

### **MODE OF DATA PROCESSING**

Personal data are processed by computer for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

### **RIGHTS OF DATA SUBJECTS TO DATA PROCESSING**

The subjects to whom the personal data refer have the right at any time to:

- Obtain confirmation of the existence or otherwise of the same data
- Know its content
- Know its origin
- Verify its accuracy
- Request their integration and/or updating, or their rectification, portability and deletion (Articles 13, 15, 16, 17, 18, 20 and 21 of the EU Regulation 2016/679).

Requests should be addressed to the Data Controller of HOTEL VILLA SCHULER S.R.L.

### **NOTES**

This privacy policy constitutes the "Privacy Policy" of this site and will be subject to continuous updates related to the stages of refinement of the technologies and automatisms adopted for the purpose of providing the site's information services.



## INFORMATIVA SUL TRATTAMENTO DEI DATI PERSONALI

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Dear Customer,

in accordance with applicable privacy laws (EU Regulation 2016/679), we would like to take this opportunity to inform you that your personal information will be processed in an ethical and transparent manner, only for lawful purposes, and in a manner that safeguards your privacy and your rights.

Processing takes place manually and using IT tools, and is done for the following purposes:

1. to obtain and confirm your booking of accommodations and other services, and to provide such services as requested. Since this processing is required to define our contractual relationship and to perform under our contract with you, your consent is not required, unless certain “sensitive” information is submitted. Should you refuse to submit your personal information, we will not be able to confirm your booking or provide you with the requested services. Processing shall cease once you check out, although some of your personal information may (or in some instances, has to) continue to be processed for the purposes and in the manner described below;
2. to comply with our “Public Safety Law” (Article 109 Royal Decree n. 773 of 18/06/1931) which requires that we provide identification data of our guests to the police, for purposes of public safety, in the manner established by the Ministry of the Interior (Decree of 7 January 2013). Data submission is mandatory, and does not require your consent. Should you refuse to provide such information, we will not be able to host you in our hotel. Data acquired for such purposes shall not be retained by us, unless you provide consent to their retention as required under point 4, infra;
3. to comply with applicable administrative, accounting, and tax regulations. For these purposes, your consent is not required. Personal information is processed by us and our persons in charge of data processing, and is disclosed outside the company only when and if required by law. Should you refuse to submit the required data for the above purposes, we will not be able to provide you with requested services. Data acquired for such purposes is retained by us for the required statutory period (10 years, or longer in case of tax audits);
4. to speed-up check-in on your next visit to our hotel. For such purposes, upon obtaining your consent (which can be revoked at any moment) your information will be retained for a maximum of 5 years, and will be used the next time you are our guest, for the reasons listed supra;
5. to allow you to receive messages and telephone calls during your stay. Your consent is required for such purposes. You can revoke your consent at any time. Such processing, where consent is granted, shall end when you check out.



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6. to send you advertising messages and updates on special rates and promotions. For this purpose, upon obtaining your consent, your information shall be retained for a maximum of 5 years, and will not be disclosed to third parties. You may revoke your consent at any moment;
7. for purposes of protecting persons, property, and company assets, using a video-surveillance system for some areas of the hotel, which are duly identified by signage. Your consent is not required for such processing because it is conducted pursuant to our legitimate interest to safeguard persons and property against potential violence, theft, robbery, damage, and vandalism. Surveillance is also conducted for purposes of fire prevention and occupational safety and health. Recorded images are erased after 24 hours, except on holidays or other days the business is closed; images are never retained for more than one week. These images are not subject to third-party disclosure, except as required to comply with a specific investigatory demands from a court or the police.

We also would like to inform you that the European Regulation grant you certain rights, including rights of access to, adjustment, erasure, limitation of, or objection to the processing of your data, as well as data portability rights, when and insofar as applicable (Articles 15-22 of the EU Regulation 2016/679). You can also file a complaint with the Data Protection Authority, according to the procedures set forth under applicable regulations.

For any other concern, and to assert your rights under the EU Regulation, please contact:

▪ **Data Controller:**

*Mr. Gerhard Schuler,  
Legale Rappresentante della HOTEL VILLA SCHULER S.R.L.  
Scesa Bastione, 2, 98039 - Taormina (ME) – [info@hotelvillaschuler.com](mailto:info@hotelvillaschuler.com)  
Tel. +39 0942 23481*

▪ **Data Protection Officer (DPO):**

*Mr. Gerhard Schuler  
Scesa Bastione, 2, 98039 - Taormina (ME) – [info@hotelvillaschuler.com](mailto:info@hotelvillaschuler.com)  
Tel. +39 0942 23481*