

PRIVACY POLICY

(pursuant to Article 13 of EU Regulation 2016/679 – GDPR)

This Privacy Policy describes how personal data of users who browse the websites managed by **Smart Family Hotel S.r.l.** (hereinafter also “Websites”) are processed.

This Privacy Policy applies in particular to the following domains:

- www.smartfamilyhotel.com
- www.hotelparadisocomo.com
- www.hotelgardeniafiera.com
- www.mamagina.it
- www.lapolenteria.com

1. Data Controller

The Data Controller is **Smart Family Hotel S.r.l.**, with registered office at Via Giacomo Scalini 70, 22034 Brunate (CO), Italy.

Email: amministrazione@smartfamilyhotel.com

The Data Controller has not appointed a Data Protection Officer (DPO), as this is not required pursuant to Article 37 GDPR.

2. Types of data processed

The Data Controller processes common personal data, including:

- identification data (name, surname)
- contact details (email, phone number)
- billing and payment data
- data relating to hotel, restaurant and event bookings
- stay details, preferences and special requests
- data provided through contact forms or information requests
- browsing data (via cookies, as specified in the Cookie Policy)

3. Purposes and legal basis of processing

A) Service-related purposes

(Article 6(1)(b) and (c) GDPR – contractual and legal obligations)

Personal data are processed without consent for:

- handling information requests
- managing hotel, restaurant and event bookings
- providing requested services
- administrative, accounting and tax management
- compliance with legal obligations or authority orders
- protection of the Data Controller’s rights (e.g. legal defense)

Providing data for these purposes is **mandatory**. Failure to do so will prevent the provision of requested services.

B) Marketing purposes

(Article 6(1)(a) GDPR – consent)

Subject to explicit consent, personal data may be processed for:

- sending newsletters and promotional communications
- sending offers related to facilities, services and events of the Smart Family Hotel group
- customer satisfaction surveys

Pursuant to Article 130(4) of Italian Legislative Decree 196/2003 (*soft spam*), the Data Controller may send communications relating to services similar to those already purchased, unless the data subject objects.

Consent may be withdrawn at any time.

4. Processing methods

Processing is carried out using paper-based, electronic and telematic tools, in compliance with the principles of lawfulness, fairness, transparency, data minimization and security set out by the GDPR.

No automated profiling activities are carried out.

5. Data retention period

Personal data are retained:

- for **up to 10 years** for administrative, accounting and tax purposes
- for **up to 5 years** for contractual relationship management
- for **up to 24 months** for marketing purposes, unless consent is withdrawn earlier

6. Data recipients

Personal data may be processed by:

- authorized employees and collaborators of the Data Controller
- external companies providing outsourced services (hosting, booking engines, management software, consultants), appointed as Data Processors

The updated list of Data Processors is available at the Data Controller's registered office.

7. Data communication and disclosure

Personal data will not be disclosed.

They may be communicated, without consent, to public or private entities when required by law.

8. Data transfer outside the EU

Where services involve the transfer of data outside the EU, such transfers will be carried out in compliance with GDPR safeguards (adequacy decisions or standard contractual clauses).

9. Data subject rights

Data subjects may exercise the rights provided by Articles 15–22 GDPR, including:

- access
- rectification or erasure
- restriction of processing
- objection to processing

- data portability
- lodging a complaint with the Data Protection Authority

10. How to exercise rights

Rights may be exercised by sending:

- an email to **amministrazione@smartfamilyhotel.com**
- a registered letter to Smart Family Hotel S.r.l., Via Giacomo Scalini 70, 22034 Brunate (CO), Italy

11. Minors

The services are not intended for minors under 18 years of age.

The Data Controller does not knowingly collect personal data relating to minors.

12. Cookies

For information on the use of cookies and other tracking tools, please refer to the dedicated **Cookie Policy** available on the Websites.

13. Changes to this Privacy Policy

This Privacy Policy may be updated. Users are encouraged to review it periodically.