

## Clients Privacy Policy

### **A. Data controller**

We wish to inform you that the personal data that you submit in the context of our contractual relation will be processed by Room Mate Rome 1 S.R.L. Room Mate Rome 1 S.R.L. Vía XXVII Aprile 3, 50129 Firenze, Italia (hereinafter the "**Apartment**"), for the purposes described below.

Unless expressly indicated otherwise at the time of the data collection, all the personal data are required as essential elements for the management, maintenance and control of our contractual relation. Failure to provide this data will make it impossible to process your application or provide the service you have contracted. The personal data shall be collected exclusively for the purposes indicated in this Privacy Policy.

You hereby confirm and guarantee the truth and accuracy of the data provided and that they reflect your current status. In this regard, you undertake to notify us of any changes to these data in accordance with the procedure established in section

### **E. Rights of the interested party.**

### **B. Purposes of processing**

We inform you that your data will be processed by the Apartment for the following purposes:

#### ***i. Based on the contractual agreement:***

- a. To manage your booking through any of the channels provided to this effect and to process your registration as an Apartment customer, and for the subsequent business relation with you, as well as
- b. Managing, maintaining and effectively controlling the relation resulting from having contracted the Apartment goods or services.
- c. To proceed to charge the designated amounts in the event of a booking cancellation outside the established time frame, as appropriate.
- d. To manage customers', stay at the Apartment, in addition to providing the services requested during their visit, which includes, among other aspects, preparation of the visit and dealing with any requests made during their stay. For this purpose, we may request data, such as the age of any minors who are guests in order to prepare the room with a cot, if needed, or any pertinent health data of guests required to manage their stay in an adequate manner, and to prepare the appropriate food menus. This also includes invoicing and charging for services consumed during their stay.

#### ***ii. Based on legal obligations:***

- a. Notify the public authorities or regulatory or government bodies in those cases where it is necessary to so under law, local by-laws or in compliance with regulatory requirements.

**iii. Based on the Apartment's legitimate interests**

- a. Carry out commercial actions and/or advertising communications through any medium including electronic or equivalent communications relating to goods or services similar to those contracted with the Apartment.
- b. Create profiles based on the personal data available to the Apartment in order to ascertain the goods and services most appropriate to your profile, thus maximizing their results and in this way offering you the best of any goods and services of interest to you.
- c. To carry out customer satisfaction surveys with the goods and/or services you have contracted in order to assess your satisfaction so that the Apartment can improve its processes and services.
- d. To manage, process and respond to any possible complaints or claims. To record your voice and/or image and save the telephone conversation and/or video having expressly informed you of this fact. It is in the Apartment's legitimate interests to maintain the quality of its service and to use the recordings, should it be necessary to protect its legal position in the event of any possible conflict.

**iv. Based on your explicit consent:**

- a. Should you so authorize, the Apartment may offer you goods and services other than those that you have contracted, including electronic or any other medium, as well as third party products that may interest you, even when this contractual relation has ended.
- b. If you so authorize, the Apartment will communicate your personal data and your commercial profile to third party companies in order to send you communications advertising their goods and services through any medium, including electronic channels, even when this contractual relation has ended. These companies may belong to the following sectors: infant and childcare products, food and nutrition, training and education, publishing, financial and credit, insurance, housing, health and pharmacy products, leisure, large consumption, automotive industry, personal care, computing, electronics, telecommunications, water, energy and transports, tourism and travel, real state, toys, garments, NGO's and products/services for animals and pets,
- c. If you so authorize, the Apartment may create a profile detailing your consumer habits using internal and external information, arising, for example, from sources accessible to the public (promotional census, list of persons who belong to professional groups or open social networks, among others), in order to advertise special offers on goods or services tailored to your needs. It may also communicate your data to third parties allow Room Mate Rome to show you advertisements about goods and services adjusted to your preferences when you visit other websites, or use social networks, even when this contractual relation has ended.

**C. Addressees**

The Apartment may communicate your personal data in the terms described in section **B. Purposes of processing** to the following entities:

- i. Public authorities or regulatory or government bodies in those cases where it is necessary to do so under law, in accordance with local bylaws or in compliance with regulatory requirements.

- ii. Third party entities for the purposes described in section f) iii) Legitimate Interest, and sections b) and c) iv) Consent and collection in Section **B. Purposes of the treatment.**

Aside from the aforementioned data communications, the Apartment also collaborates with some third-party service providers who have access to your personal data and who process the aforementioned data on behalf of the Apartment as a result of a provision of services.

The Apartment pursues strict selection criteria for its service providers in order to comply with its obligations in data protection matters and undertakes to enter into the corresponding data processing agreements through which, among other obligations, it shall impose the following requirements, application of technical and organizational means; processing of personal data for the agreed purposes and only in accordance with written instructions from the Apartment; and deleting or returning data to the Apartment when the provision of services is complete.

Specifically, the Apartment will contract the provision of service from third party suppliers who, by way of example without limitation, perform their activity in the following sectors: logistics and legal advisory services, approval of suppliers, professional service companies, companies relating to maintenance, technological service providers, IT service providers, physical security, instant messaging and call center companies.

#### **D. Data sources**

In addition to the personal data that you have provided, the Apartment may also process personal data obtained from common files, sector files and /or public bodies, in accordance with the purposes and legitimate grounds described in section **B "Purposes of processing"** above.

In accordance with the foregoing, the Apartment will process the personal data facilitated by the aforementioned third parties from the following categories:

- i. Identification data
- ii. Postal or email addresses

Specially protected personal data will not be obtained.

#### **E. Rights of the interested party**

You may revoke the consent granted in the cases indicated in this document at any time, on request. We inform you that, pursuant to current law, you are entitled to exercise your rights of access, rectification, cancellation and opposition, as well the right to deletion, restriction of processing and right to portability of your data, by attesting to your identity (by means of a copy of your national or equivalent identity document) at the following address: Room Mate Rome 1 S.R.L. Room Mate Rome 1 S.R.L. Vía XXVII Aprile 3, 50129 Firenze, Italia or to the following email [privacy@theroomsofrome.com](mailto:privacy@theroomsofrome.com)

If you consider that Room Mate Rome 1 S.R.L. has failed to comply with the aforementioned rights, you may file a complaint with the Italian Data Protection Authority.

#### **F. Conservation**

Your personal data will be kept throughout the period of your contractual relation with the Apartment.

Upon termination of the agreement, your personal data will be deleted as soon as all the actions required to manage and conclude any obligation remaining between the parties have been completed, carrying out all the administrative formalities required during this period, except in those cases where mailing of commercial communications apply.

Without prejudice to the foregoing, your data will remain duly blocked while any liabilities resulting from execution of our contractual agreement remain, or any other legal obligations with which the Apartment is required to comply.

In this regard, the Apartment guarantees that it will not process the data unless this is necessary in order to formulate, exercise or defend any complaints or claims, or when it is required to do so in order to provide Public Authorities or Judges and Courts with the data during the limitation period of your legal rights or obligations.