







PRIVACY NOTICE FOR PERSONAL DATA PROCESSING
 under Article 13 of the General Data Protection Regulation (EU) 679/2016 ("GDPR")
 last update: 1 February 2019

	DATA CONTROLLER	RICERCA 15 S.r.l ("Controller" or "RICERCA 15") Tax Code 10059390962 via Vittor Pisani 20 -20124- Milan, Italy.
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	SOURCE FOR DATA COLLECTION The website www.21wol.it (the "Website"), the website www.facebook.com and cookies (small text files containing a given amount of information exchanged between the Website and the browser in use)
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 1 CATEGORIES OF PROCESSED PERSONAL DATA	 1.1 PURPOSES OF THE PROCESSING	 1.2 MANDATORY OR OPTIONAL PROVISION OF DATA	 1.3 LEGAL BASIS FOR THE PROCESSING	 1.4 PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED
<ul style="list-style-type: none"> PERSONAL DATA (name, surname) CONTACT DATA (e-mail, telephone number) EMPLOYMENT STATUS (student or worker) ANY OTHER DATA DISCLOSED THROUGH THE "SPECIFIC REQUESTS" SECTION OF THE WEBSITE CONTACT FORM (including any special data categories, "Sensitive Data", such as data revealing information about health status, relating to handicap or disabling diseases or allergies) 	<p>1.1.1 - Contractual purposes</p> <ul style="list-style-type: none"> Handling of reservation and presale requests for 21WOL services; Handling of queries on 21WOL by the Website user. 	<p>Mandatory.</p> <p>In the event of failure to provide the data, RICERCA 15 will not be able to process your reservation and presale requests or your queries.</p> <p>In case of provision of Sensitive Data along with sending your query, we could process them solely upon your prior express consent. You may withdraw your consent to the processing of such personal data at any time.</p>	<p>The necessity of performing a contract to which you are a party and complying with law requirements.</p> <p>Your express consent to the processing of Sensitive Data.</p>	<p>RICERCA 15 will store your personal data, acquired through your reservation and presale requests, for accommodations offered through the Website or your queries for a period not exceeding 10 years.</p>
<ul style="list-style-type: none"> PERSONAL DATA (name, surname) CONTACT DATA (e-mail, telephone number) EMPLOYMENT STATUS (student or worker) 	<p>1.1.2 - Marketing purposes</p> <ul style="list-style-type: none"> Sending commercial communications, updates on latest releases, offers and promotions relating to our services or to those of companies belonging to our group or our partners operating in the hotel business, catering, coworking, public and private event industries. Market research, statistical analyses or other research to improve our products and services and customer satisfaction survey. <p>We might carry out these activities through our newsletter via email or phone, this including by automated means (sms).</p>	<p>Optional.</p> <p>In the event of failure to provide the data, RICERCA 15 will not be able to keep you regularly updated about offers and promotions reserved to its customers or use your personal data for market researches and statistical analyses or customer satisfaction surveys.</p> <p>If you have granted your consent, you may withdraw it at any time by clicking onto the "unsubscribe" link included in the e-mail receive or by sending an e-mail to privacy@21wol.it</p>	<p>Your express consent to the processing of personal data.</p>	<p>As to the processing of your personal data for direct marketing purposes, if you have expressly granted your consent, in accordance with law requirements and the general Measure adopted by the Italian Data Protection Authority on 24 February 2005, RICERCA 15 will delete your personal data that were processed for direct marketing purposes within 24 months of their recording.</p>
<ul style="list-style-type: none"> PERSONAL DATA (name, surname) 	<p>1.1.3 – Purposes concerning the improvement of relations with customers (soft spam)</p>	<p>Optional.</p>	<p>The legitimate interest of the Controller to develop relations with its customers and increase the volume of</p>	<p>RICERCA 15 undertakes to delete the personal data of the user of the Website, in case no</p>

<ul style="list-style-type: none"> • CONTACT DATA (e-mail, telephone number) • EMPLOYMENT STATUS (student or worker) 	<ul style="list-style-type: none"> • Sending commercial and promotional communications containing offers for products and services similar to those covered by your reservation and presale requests. <p>We will carry out these communications through the e-mail address you provide within the form on the Website.</p>	<p>You are entitled to exercise your right to object to the receipt of these communications at any time by clicking onto the <u>“unsubscribe” button included in the e-mail, or by sending an e-mail to privacy@21wol.it</u></p> <p><u>If you exercise your right to object, you will no longer receive such communications.</u></p>	<p>service requests and sales in relation to which you have already expressed interest.</p>	<p>relation has been entertained with the same for two years from the date on which RICERCA 15 and the user last interacted.</p>
<ul style="list-style-type: none"> • PERSONAL DATA (name, surname) • CONTACT DATA (e-mail, telephone number) • EMPLOYMENT STATUS (student or worker) • ANY OTHER DATA IN YOUR CURRICULUM VITAE, INCLUDING ANY SENSITIVE DATA 	<p>1.1.4 - Personnel selection purposes</p> <ul style="list-style-type: none"> • Personnel recruitment, selection and assessment, including for other companies belonging to RICERCA 15 group, by submitting unsolicited applications (curriculum vitae) or replying to job alerts and/or advertisements on the Website. 	<p>Mandatory.</p> <p>In the event of failure to provide the data, RICERCA 15 will not be able to process your reservation and presale requests or your queries.</p> <p>In case of provision of Sensitive Data through your application, we can only process them if you grant your express consent. Sensitive Data will be processed solely if needed to consider your application. You may withdraw your consent to the processing of such data at any time.</p>	<p>The necessity of performing pre-contractual obligations to which you are a party and complying with law requirements.</p> <p>Your express consent to the processing of Sensitive Data.</p>	<p>RICERCA 15 will store your personal data acquired through your application (if any), for a period not exceeding one year from the date of their latest provision.</p>
<p>BROWSING DATA (log files, IP addresses, domain names of users' terminals, URI addresses, server request times and methods, server responses, other parameters concerning the operating system and the IT environment of the Website user)</p>	<p>1.1.5 - Purposes concerning the analysis of the Website browsing</p> <ul style="list-style-type: none"> • Collection of anonymous statistical data on the use of the Website by users; • Controlling the Website operation 	<p>Optional.</p> <p>The failure in providing the data, carried out by disabling cookies in the browser (see table No 4 below), could prevent you from accessing all the Website functions.</p>	<p>The legitimate interest of the Controller to control the Website operation and to obtain data on its usage.</p>	<p>see COOKIE POLICY Table No. n. 4</p>

The Controller intends to store your personal data for a period of time no longer than it is necessary in view of the purposes for which the data were collected and processed. The above does not apply if the Controller needs to store such data to comply with law requirements, or to establish, exercise or defence of right in court proceedings. Once the purposes for which personal data were collected and processed are achieved, we will remove them from our systems and registers and/or implement adequate measures to anonymise them, so that you cannot be identified.

In general, and with regard to any type of personal data, if RICERCA 15 cannot accurately determine in advance the period for which personal data are to be stored, RICERCA 15 hereby undertakes to process such data in line with the data adequacy, relevance and minimisation principles, as prescribed by the GDPR, by verifying the necessity of storing them on an annual basis.



2 - SUBJECTS AUTHORISED TO PROCESS DATA

Your data may be processed by employees of RICERCA 15 corporate departments in charge of achieving the above purposes, expressly authorised to process data and equipped with adequate operating instructions.



3 - POSSIBLE RECIPIENTS OF THE DATA

The personal data processed will not be disclosed.

The following subjects may become aware of your personal data for processing purposes set out above:

- RICERCA 15 group companies for administrative and accounting purposes.
- Subjects who may access data by virtue of EU law or of the law of the Member State to which the Controller is subject;
- Persons who, within EU borders and acting as independent controllers or processors specifically appointed by RICERCA 15, autonomously supplementing the activities and services under Table 1 above, i.e., bank operators, internet providers, carriers and shippers, companies carrying out marketing activities, companies providing IT infrastructure and IT support and consulting services as well as software and website design and building, law firms, companies providing services aimed customising and optimising our services, companies providing data analysis and development services (including those relating to our users' interactions with our services), service centres, companies or consultants in charge of providing the Controller with further services, within the limits of the purposes for which the data were collected;
- RICERCA 15 purchasers or successors in the event of merger, sale, restructuring, reorganisation, winding-up or other sale or transfer of some or all of RICERCA 15 assets in the context of which personal information are transferred.



4 - COOKIE POLICY

The Website uses the following types of cookies:

Technical cookies

Technical cookies (session or persistent cookies), i.e., small text files containing a given amount of information exchanged between the Website and the terminal (the browser in use) are employed. These cookies allow the Website to operate properly and be fit for use, to provide a better experience within the same. For example, they allow to identify and store language preferences for the Website, or to identify and store preferences relating to accommodation presale requests on by a user.

Analytics cookies

Analytics cookies created and made available by a third party, i.e. Google Analytics, are used for mere internal statistical analyses concerning access, to enhance the Website and simplify its use, as well as to monitor its proper operation. Nevertheless, the Controller has implemented the most adequate measures to minimise the identification power of these cookies. For the Google Analytics cookie policy, click [here](#).

Profiling Cookies

User profiling cookies are currently not in use, nor are other tracing methods.

Third-party cookies

Third parties can install cookies on the device from which you access the Website. RICERCA 15 does not control the deployment of third-party cookies and, therefore, it is not responsible for their use. Third parties that own the aforementioned cookies set out their own privacy notices and manners for collecting and processing data.

Below is the list of third-party cookies used:

Facebook - [https:// en-gb.facebook.com/policies/cookies/](https://en-gb.facebook.com/policies/cookies/)

Instagram - <https://help.instagram.com/1896641480634370?ref=ig>

Twitter - <https://help.twitter.com/en/rules-and-policies/twitter-cookies>

Pinterest: <https://policy.pinterest.com/en/cookies>

Youtube: <https://policies.google.com/technologies/cookies>

Pingdom - <https://www.pingdom.com/legal/cookie-policy>

Tripadvisor - <https://www.tripadvisor.co.uk/CookiePolicy>

Trivago - <https://www.trivago.com/privacy-policy>

Booking - [https://www.booking.com/general.en-gb.html?aid=356980;label=gog235jc-](https://www.booking.com/general.en-gb.html?aid=356980;label=gog235jc-1BCBQoggJCBXRlcm1zSDNYA2hQjAEBmAEJuaEXyAEM2AEB6AEBiAIBqAIDuAK83fPjBQ:sid=28623e6d4a959090bd08b10ab7181b96;tmpl=docs/privacy-policy)

[1BCBQoggJCBXRlcm1zSDNYA2hQjAEBmAEJuaEXyAEM2AEB6AEBiAIBqAIDuAK83fPjBQ:sid=28623e6d4a959090bd08b10ab7181b96;tmpl=docs/privacy-policy](https://www.booking.com/general.en-gb.html?aid=356980;label=gog235jc-1BCBQoggJCBXRlcm1zSDNYA2hQjAEBmAEJuaEXyAEM2AEB6AEBiAIBqAIDuAK83fPjBQ:sid=28623e6d4a959090bd08b10ab7181b96;tmpl=docs/privacy-policy)

To withdraw your consent to these cookies, please click on the following:

<http://www.youronlinechoices.com/uk/your-ad-choices>

or<

<http://www.allaboutcookies.org/manage-cookies/index.html>

Options on how the Website uses cookies through the browser settings

You can in any event disable cookies by changing your browser settings. However, it is worth pointing out that changing these settings could disable the Website, if cookies that are necessary to provide our services are blocked. Each browser features different settings to disable cookies. Links to instructions on commonly used browsers are as follows [Apple Safari](#), [Google Chrome](#), [Microsoft Internet Explorer](#), [Mozilla Firefox](#), [Opera](#).



5 – TRANSFER OF PERSONAL DATA ABROAD

The entire processing of personal data is carried out in Italy and in countries within EU borders.

Should it be necessary to transfer personal data to third countries, the Controller undertakes to:

- ensure that the country to which your personal data will be sent guarantees an adequate level of protection, as provided under Article 45 of the GDPR; or
- comply with the standard contractual clauses approved by the European Commission as to the transfer of personal information outside the EEA (these are clauses approved under Article 46(2) of the GDPR); or
- ensure that, should your personal data be required to be transferred to the United States, the relevant third party is registered with the Privacy Shield.

For further information on rules regulating data transfers to third countries, click [here](#).



6 – YOUR RIGHTS AS DATA SUBJECT – COMPLAINT TO THE SUPERVISORY AUTHORITY

With regard to the aforementioned personal data processing, you may exercise the following rights at any time under the conditions and within the limits provided under Articles 12 and 13 of the GDPR by sending an email to privacy@21wol.it:

- Right of access (Article 15 GDPR);
- Right to rectification of inaccurate data and to have incomplete personal data completed (Article 16 GDPR);
- Right to erasure of personal data (Article 17 GDPR);
- Right to restriction of processing (Article 18 GDPR);
- Right to object to processing under Article 6(1), point (e) or (f), of the GDPR, including profiling (Article 21 GDPR);
- Right to lodge a complaint with a supervisory Authority (Article 77 GDPR)

Moreover, if the processing is based on your consent or on the contract and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit those data to another controller without hindrance under Article 20 of the GDPR.

You may withdraw your consent granted for marketing purposes at any time.

You may object to the processing of your data at any time with regard to unsolicited communications by the Controller for direct service sale ("soft spam") directly to the email address you provided when reserving, purchasing in advance or purchasing any of the services offered on the Website, under Article 130, paragraph 4, of Italian Legislative Decree No. 196/2003, as amended by Italian Legislative Decree No. 101/2018.

You may choose to be contacted for the above purpose only through traditional methods, and object to receiving communications by automated means.



7 – MINORS

The Website and the services offered by RICERCA 15 are in no way intended for minors. Therefore, the Controller may not collect and/or process personal data with regard to minors. If personal data regarding minors are included on the Website, RICERCA 15 will promptly delete them.