

PRIVACY POLICY OF THE WEBSITE WWW.WESTEND.IT

Strohmer Alexander Sas (hereafter "Hotel Westend") explains, on this page, how it processes the data of users who visit its site and how the cookies that are installed by the site act.

This Privacy Policy is made in compliance with Article 13 of the GDPR 2016/679 (General Data Protection Regulation, European Data Protection Regulation), the Privacy Guarantor's Guidelines of June 10, 2021, the EDPB Guidelines 5/2020 referring to consent, the ECJ Judgment October 1, 2019 C-673/17, the General Measure of the Privacy Guarantor on Cookies of May 8, 2014, no. 229, the "Working Document 02/2013 providing guidance on obtaining consent for cookies," WP 29 Opinion No. 4/2012 On Cookie Consent Exemption, Directive 2002/58/EC, and Recommendation No. 2/2001 of the Working Group Article 29.

The following applies only to the site www.westend.it; the Data Controller is not responsible for the data entered and cookies installed by other sites that may be consulted through links.

Information about the data controller and data protection officer (if any)

The Data Controller is Strohmer Alexander Sas, with registered office in via Speckbacher 9, 39012 Merano (BZ). To exercise your rights under the regulations, you can contact the Data Controller at its office or by calling +39 0473 447654 or writing to info@westend.it.

Purpose and legal basis for processing

The Data Controller explains below for what purposes it processes site user data.

Purpose of processing	Fulfilling legal obligations
Description	Data processing is necessary for the fulfillment of obligations required by law, regulation, or EU legislation
Legal Basis	Fulfillment of a legal obligation to which the data controller is subject (Art. 6 para. 1 lit. c) GDPR 2016/679)
Nature of conferment	The provision of data is necessary to fulfill a legal obligation
Consequences of failure to confer	N.A.
Storage time	That required by the relevant legislation
Effective retention time	From the provision of data

Purpose of processing	Statistical analysis on aggregated or anonymized data
Description	The processing does not allow user identification, but serves to verify the adequacy of the web marketing campaigns adopted and/or the proper functioning of the site, measuring the user traffic it generates. The processing of aggregated or anonymous data, which do not allow the identification of the

	user, does not fall under the scope of the legislation on the protection of personal data and therefore no consent is required for their processing.
Legal Basis	N.A.
Nature of conferment	N.A.
Consequences of failure to confer	N.A.
Storage time	N.A.
Effective retention time	N.A.

Purpose of processing	Information Request/Contacts
Description	Data processing is necessary to provide feedback to your request.
Legal Basis	Execution of a contract to which the data subject is a party or execution of pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 lit. b) GDPR 2016/679)
Nature of conferment	The provision of data is necessary to fulfill a contractual obligation
Consequences of failure to confer	Failure to provide data may result in the total or partial inability to respond to the submitted request.
Storage time	20 years
Effective retention time	From the provision of data

Purpose of processing	Availability request
Description	Data processing is necessary to provide feedback to the availability request on the dates indicated
Legal Basis	Execution of a contract to which the data subject is a party or execution of pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 (b) GDPR 2016/679)
Nature of conferment	The provision of data is necessary to fulfill a contractual obligation
Consequences of failure to confer	Failure to provide data may result in total or partial inability to respond to the submitted request.
Storage time	20 years
Effective retention time	From the provision of data

Purpose of processing	Reservation of stay
Description	Data processing is necessary to book the stay at the Facility
Legal Basis	Execution of a contract to which the data subject is a party or execution of pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 (b) GDPR 2016/679)
Nature of conferment	The provision of data is necessary for the conclusion of a contract

Consequences of failure to confer Failure to provide data may result in the total or partial inability to respond to the submitted request.

Storage time 20 years

Effective retention time From the provision of data

Purpose of processing **Digital check-in**

Description Data processing is required to check in online, so as to replace the waiting time in the Facility

Legal Basis Performance of a contract to which the data subject is a party or performance of pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 lit. b) GDPR 2016/679) and performance of a legal obligation to which the data controller is subject (Art. 6 para. 1 lit. c) GDPR 2016/679)

Nature of conferment The provision of data is necessary to fulfill a legal or contractual obligation

Consequences of failure to confer Failure to provide data may result in total or partial inability to respond to the submitted request.

Storage time 20 years

Effective retention time From the provision of data

Purpose of processing **Newsletter**

Description Processing is required to subscribe to the newsletter and receive commercial communications

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

Nature of conferment The provision of data is optional

Consequences of failure to confer Failure to provide data will only result in non-subscription and inability to receive the newsletter

Storage time Until consent is revoked

Effective retention time From the consensus

Purpose of processing **Marketing in general**

Description The processing is necessary to receive commercial communications in the manner provided by the Data Controller, which may be, by way of example and, e-mail, SMS, paper material etc.

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

Nature of conferment The provision of data is optional

Consequences of failure to confer Failure to provide data will only result in the inability to receive commercial communications

Storage time Until consent is revoked

Effective retention time From the consensus

Purpose of processing	Stay insurance
Description	Treatment is required to purchase insurance for the stay
Legal Basis	Execution of a contract to which the data subject is a party or execution of pre-contractual measures taken at the request of the data subject (Art. 6 para. 1(b) GDPR 2016/679)
Nature of conferment	The provision of data is necessary for the conclusion of a contract
Consequences of failure to confer	Failure to provide data may result in the total or partial inability to respond to the submitted request.
Storage time	20 years
Effective retention time	From the provision of data

Purpose of processing	Nominations
Description	Processing is necessary for sending and managing the application and for participation in the candidate search and selection process
Legal Basis	The legal basis is the performance of a contract to which the data subject is a party or performance of pre-contractual measures taken at the request of the data subject (Art. 6 para 1 lett. b) GDPR 2016/679). Any special data will be processed by virtue of the fulfillment of obligations and for the exercise of specific rights of the Data Controller or the data subject in the field of labor law and social security and protection (Art. 9 paragraph 2 letter b) GDPR 2016/679). In case of the continuation of the personnel selection procedure, up to the recruitment, for the processing of special data, Article 9 paragraph 2 lett. h) GDPR 2016/679 is added, whereby the processing is necessary for purposes of preventive medicine or occupational medicine, evaluation of the employee's ability to work [...].
Nature of conferment	The provision of data is necessary
Consequences of failure to confer	Failure to provide data may result in the total or partial inability to respond to the submitted request.
Storage time	20 years from the conclusion of the personnel selection procedure in case of continuation in the personnel selection procedure
Effective retention time	From the provision of data

Purpose of processing	Geolocation and user location
Description	Authorization is required to allow the site to locate your location
Legal Basis	Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)
Nature of conferment	Authorization is optional, failure to authorize will result in the inability to track the user's location
Consequences of failure to confer	Failure to provide data may result in the total or partial inability to respond to the submitted request.
Storage time	Until consent is revoked

Effective retention time From the consensus

Methods of processing, automated decision making.

Data processing is carried out in computer-based mode, although potential processing in paper-based mode is not excluded. No automated decision-making processes are used to process your personal data. Any profiling by cookies is done against specific user consent: more information is available in the cookie policy and/or information banner at first access.

User profiling carried out by means other than cookies is described in the section "Purposes of processing," where carried out.

Target audience

Your data may be disclosed to the following categories of recipients:

- Computer service providers and hosting companies to ensure the operation of the site and other explicit purposes
- Communications companies, agencies, marketing consultants and platform providers for sending promotional communications
- Printing and sending documentation by postal mail
- Platforms that enable the use of specific services (e.g. electronic payment systems, fast check-in etc.)
- Public authorities, administrations and agencies.

Transfer of data to third countries or international organizations

Data disclosed may be transferred to third countries and/or international organizations outside the EU. The transfer is legitimized by the presence of an adequacy decision.

The service providers listed below may transfer your personal data outside the European Union. In detail:

SUPPLIER	DATA TRANSFER STATUS	ADEQUACY DECISION
Alphabet (Google Font)	USA	EU-US Data Privacy Framework del 10.07.2023
Yanovis	EU	GDPR 2016/679
Booking Südtirol	EU	GDPR 2016/679
Easymailing.eu (Fast Check-in)	EU	GDPR 2016/679
Hogast.it	EU	GDPR 2016/679
Altea Software Srl	EU	GDPR 2016/679

The hosting of the site is within the European Union.

Rights of the data subject and complaint to the Privacy Guarantor

You have the right to ask us at any time for access to the data concerning you, their amendment, supplementation or deletion, the restriction or opposition to their processing, where there are legitimate reasons, as well as the portability of these data to another Data Controller. We will provide you with a response in writing within 30 days. You may revoke, at any time, the consents you have given on this site, by contacting one of the contact details given within this Privacy Policy. You may also lodge a complaint with the Control Authority, where you believe that your data has been processed unlawfully.