

**INFORMATION ON THE PROCESSING OF PERSONAL DATA**  
**of the users visiting the websites of Cosmopolita Hotel Rome - Tapestry Collection by Hilton**

***Pursuant to Article 13 of EU Regulation 2016/679***

This page contains a description of the policies for managing the website in regard to processing the personal data of the users who visit the site and their privacy. This information is provided pursuant to article 13 of GDPR 679/2016 – Laws concerning the Protection of Personal Data and the individuals who interact with the web services of Cosmopolita Hotel Rome - Tapestry Collection by Hilton, which is accessible by telematics means through the following web address:

<https://www.hotel-cosmopolita.com>,

which corresponds to the home page of the official website of Cosmopolita Hotel Rome - Tapestry Collection by Hilton on Via di Santa Eufemia, 5 - 00187 Roma.

The information provided does not concern other online websites, pages or services that can be accessed via hyperlinks on the above website but relate to resources outside the Cosmopolita Srl domain.

**DATA CONTROLLER**

Following access to this website, data pertaining to persons that are identified or identifiable may be processed. The “Data Controller” of the personal data collected following a visit to our website or any other data used for providing our services is Cosmopolita Srl, Via di Sant’Eufemia, 5 - 00187 – Roma. The Data Protection Officer can be contacted at [privacy@hotel-cosmopolita.com](mailto:privacy@hotel-cosmopolita.com).

**PLACE WHERE DATA IS PROCESSED**

Data processing pertaining to the web services of this website [(physically hosted by SUPPORTHOST OÜ ("www.supporthost.com") in a intra Eu server] is carried out at the headquarters and said data is processed only by the technical personnel in charge of processing of the Data Processing Office on instructions from the controller, or by eventual persons in charge of processing who are entrusted to process occasional maintenance operations.

The personal data obtained from the users who submit hotel booking requests or through informative material (informative notes, newsletters, registration, etc) is used only to carry out the services or assistance requested and is not transmitted to third parties, except in the following possible cases:

- Business partners of Cosmopolita Srl, to whom the hotel transmits the data exclusively in order to process on-line reservations.
- Persons, companies or professional offices who lend assistance and consulting services to Cosmopolita Srl, concerning accounting, administrative, legal, financial and tax matters;
- Subjects who are authorized to have access to the data by law or through requests by the authorities;

Personal Data can be shared within the hotels of “HILTON” or controlling companies located in the world, (Hilton Worldwide Holdings Inc. and its subsidiaries and members of the Hilton portfolio of brands, including franchised and managed hotels), with your consent, including companies located in a country that is not a member of the European Union and that may not guarantee the adequate safeguards provided by the Privacy Code, in accordance with Chapter V of the GDPR 679/2016, with a view to supplying specific services requested. The credit card data used for booking will be automatically unavailable at the end of the stay.

**CATEGORIES OF PROCESSED DATA – LEGAL BASIS – NATURE OF DATA PROVISION**

**NAVIGATIONAL DATA**

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols. Such information is not collected in order to relate it to identified data subjects, however it might allow user identification per se after being processed and matched with data held by third parties.

This data category includes IP addresses and/or the domain names of the computers used by any user connecting with this web site, the URI/URL (Uniform Resource Identifier /Locator) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment. The data necessary for the use of web services are also processed in order to:

- obtain statistical information on the use of services (most visited pages, number of visitors by time or day, geographical areas of origin, etc.);
- check the correct functioning of the services offered.

The data will be used to ascertain responsibility in the event of hypothetical IT crimes against the site.

*Legal Basis:* The processing is necessary for the pursuit of the legitimate interest of the data controller or third parties, provided that the interests or fundamental rights and freedoms of the data subject who require the protection of personal data do not prevail, taking into account the reasonable expectations of the interested party and the activities strictly necessary for the functioning of the site and navigation itself. (Art. 6, par. 1, lett. f) and Recital 47 of the GDPR).

*Nature of Data Provision:* The provision of data is necessary for browsing the website.

**DATA CARRIED OUT THROUGH SOCIAL MEDIA PLATFORMS**

Regarding the processing of personal data carried out by the managers of the Social Media platforms used by the Data Controller, please refer to the information notice provided by them through their respective privacy policies. The Data Controller processes the personal data provided by users through

the pages of the dedicated Social Media platforms, to manage interactions with users (comments, public posts, etc.) and in compliance with current legislation.

#### *DATA VOLUNTARILY PROVIDED BY THE USER*

Sending messages, on the basis of the user's free, voluntary, explicit choice, to this website contact addresses, or sending private messages to the data controller social media pages and profiles (where this option is available), and filling in and sending the forms made available on the data controller websites entail the acquisition of the sender's contact information – which is necessary to provide a reply – as well as of any and all the personal data communicated in that manner.

The personal information regarding the individual who visited the website is not collected or used. The visitors remain anonymous. The only exception to this rule concerns the information for personal identification needed to fulfill the booking contractual obligations on behalf of the user.

#### **A. Reservations**

The information provided will not be used for marketing purposes and will not be sold, transmitted, given by contract, or sent to third parties in any way, except for our provider of on-line booking services together with credit card issuing companies that can be contacted to verify their validity, Hilton Worldwide Holdings Inc, (<https://www.hilton.com/>), to whom elaboration of the reservations is entrusted to, only for online booking management purposes.

In any event, the website administrator guarantees the use of scrupulous procedures in order to protect the navigational data and the use of particular precautions to protect the credit card data provided for on-line reservations.

*Legal Basis:* The processing is necessary for the execution of a contract of which the interested party is a party (Recital 44 - art. 6 §. 1 lett. b of the GDPR)

*Nature of Data Provision:* The provision of personal data is mandatory, as it is essential to be able to execute legal obligations.

#### **B. Personal Data Processing Collected from Curriculum Vitae**

You can use the Cosmopolita Srl contact to send candidates' CVs both on paper and in an electronic format. Providing spontaneous and voluntary of the Curriculum Vitae data will be considered as implicitly informed consent by the data subjects for personal data processing contained, only following the purposes related to the selection of potential candidates.

The data processed for the purpose of selection of candidates are personal useful to search for the particular profile. In general, the nature of the data is normal, except in some cases where you may indicate any sensitive data necessary to identify the specific requirements of the regulations, such as specifying a particular protected class, the suitability for certain jobs and / or start-ups required, within the limits set by the General Provision of June 5, 2019 which modified the General Authorisation of the Garante (Italian Supervisor Authority) no. 1 of December 15, 2016 on the processing of sensitive data in work relationships;

*Legal Basis:* the processing is based on the consent to the processing of personal data (Recitals 42 and 43 and art. 6, §. 1, lett. a) of the GDPR) and/or the processing is necessary for the execution of a contract of which the data subject is a party or for the execution of pre-contractual measures adopted at the request of the same. (Recital 44 and Art. 6, §. 1, lett. b of the GDPR).

*Nature of Data Provision:* The provision of personal data is mandatory, failure to provide the necessary data will make it impossible to apply.

#### **General Rules for providing the CV**

Any CV received spontaneously, replying to a job advertisement, will be stored directly by person in charge of the processing in accordance with the safety guidelines of personal data adopted in compliance with the security measures according to Chapter IV Section 2 of GDPR 679/2016. These will be printed only on the occasion of a meeting and a conversation with the data subject.

To send Curriculum Vitae use the following addresses: Human Resources Dpt, Cosmopolita Srl, Via di Sant'Eufemia, 5 - 00187 – Roma, e-mail: [hr@gwhotels.com](mailto:hr@gwhotels.com)

#### **C. Administrative, Financial and Accounting Data Management**

For organisational, administrative, financial nature and for accounting and customer/user data management, it is possible that the data controller may process the relevant personal data.

*Legal Basis:* The processing is necessary for the execution of a contract of which the data subject is a party (Recital 44) or for the fulfillment of legal obligations (Recital 45) - art. 6 §. 1 lett. b) and c) of the GDPR.

*Nature of Data Provision:* The provision of personal data is mandatory, as it is essential to be able to execute legal obligations.

#### **COOKIES AND TRACKING TECHNOLOGIES USED**

In this website we are applied cookies technologies for different purposes, including computer technology authentication or to monitor sessions, and to store specific technical information regarding the users that access to the web server provider, in compliance with Guidelines on cookies and other tracking tools adopted on the websites (10 June 2021) of the Italian Data Protection Authority and Guidelines of the European Data Protection Board (EDPB) of May 2020. More information on the cookies adopted available in the Cookie Policy of this site web.

*Legal Basis:* For the non-technical cookies and similar technologies, the processing is based on the consent to the processing of personal data (Recitals 42 and 43 and art. 6, §. 1, lett. a of the GDPR). The consent is given through the banner and the cookie policy of the website.

*Nature of Data Provision:* See the cookie policy in the website footer.

#### **PERIOD FOR DATA RETENTION - CRITERIA USED**

**Rev: 22/07/2025**

According to the provisions set forth in art. 5 par. 1 lett. e) of the Regulation (EU) 2016/679, collected personal data shall be kept in a form which permits identification of data subjects for a period not exceeding the purposes for which the personal data were collected and subsequently processed.

Data retention periods depend on the purposes of the processing:

- purposes related to technical navigation data for the correct functioning and browsing the website: data are kept for no longer than seven days (except where judicial authorities need such data for establishing the commission of criminal offences);
- purpose of reply to info request/services supply request (up to 12 months for contact requests; 10 years for administrative / accounting / financial documentation relating to the provision of a service);
- data collection for staff recruitment (up to 24 months). In principle, the data collected during the recruitment process will be deleted as soon as it becomes apparent that no job offer will be made or that the offer will not be accepted by the candidate;
- purpose of administrative / accounting / financial management: 10 years as required by law for the conservation of administrative / accounting / financial documentation.
- purpose of cookie management: See the cookie policy in the website footer.

#### **TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES**

Personal data is not transferred to non-EU third countries, except for any cases described above where the controller provide appropriate safeguards, in compliance with the provisions of Chapter V of the GDPR 679/2016, in particular by standard data protection clauses adopted by the EU Commission (Article 46, 2c GDPR) according to commission implementing decision (EU) 2021/914, pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council for Transfer controller to controller of 4 June 2021 for the transfer of personal data to third countries.

#### **OPTIONAL DATA PROVISION**

Subject to the specifications made with regard to navigation data, users are free to provide the personal data listed in the request forms of Cosmopolita Hotel Rome - Tapestry Collection by Hilton or referred to in contacting the hotel in order to provide CV, to make on-line reservations or to request delivery of information materials and other communications. Failure to provide such data may entail the failure to be provided with the items requested.

#### **PROCESSING ARRANGEMENTS AND DATA PROTECTION MEASURES**

Personal data is also processed with automated means for no longer than is necessary to achieve the purposes for which it has been collected indicated in this information. The Data Controller and the Data Processors ensures the adoption of appropriate technical and organisational measures to ensure a level of security appropriate to the risk and that personal data are processed adequately and in accordance with the purposes for which they are processed, in compliance with the provisions of the art. 32 of the GDPR 2016/679. Specific security measures are implemented to prevent the data from being lost, used unlawfully and/or inappropriately, and accessed without authorisation. There is no provision for an automated decision-making process for the processing of personal data.

#### **DATA SUBJECTS' RIGHTS**

The data Controller is Cosmopolita Srl. The Data Protection Officer is Mr. Massimo Bruno. You may contact them at any time to exercise your rights as provided for in Chapter III GDPR 679/2016, in particular, the right to request access to and rectification or erasure of personal data or restriction of processing concerning you or to object to processing, the right to obtain a copy of the personal data being processed as well as the right to data portability, also by sending a written request to the following e-mail address: [privacy@hotel-cosmopolita.com](mailto:privacy@hotel-cosmopolita.com).

#### **RIGHT TO LODGE A COMPLAINT**

If a data subject considers that the processing of personal data relating to him or her as performed via this website infringes the Regulation, he or she has the right to lodge a complaint with the Data Protection Authority pursuant to Article 77 of the Regulation, or to an effective judicial remedy pursuant to Article 79 of the Regulation.