

Browsing and cookie data processing statement

Last update: September 2018

Dear User,

H.n.h. Hotels & Resorts SpA (hereinafter "**Hotel**") respects and safeguards your privacy, therefore below we set out our statement concerning handling of the personal data of users who interact with the website of the Hotel (hereinafter "**Users**") starting from the address www.hotelsantelena.com (hereinafter "**Site**"), specifically referring to cookie data collected during the browsing of the Site.

This statement relates solely to any treatment of users' personal data handled by the Hotel during and on occasion of browsing on the Site. Specific privacy statements will be indicated or shown on Site pages relating to the provision of specific services on request.

1. **Data controller**

The Data Controller responsible for the handling of Site Users' personal data is the company H.n.h. Hotels & Resorts SpA with registered offices in Trinity Palace - Via Saragat, 1 - Mestre - Venezia (VE)

2. **Purpose of data handling and processing**

Users' data are collected and used to permit browsing on the Site, improve the browsing experience and also to respond to any requests or communications from Users.

3. **Types of data handled and processed**

Browsing data: during the course of their normal operation, the information technology systems and software procedures used to operate this Site capture some personal data whose transmission is implicit in the use of Internet communication protocols. These are items of information that are not collected to be associated with identified interested parties but that, by virtue of their intrinsic nature, could make it possible, via processing and association with data held by third parties, to identify the Users. This category of data includes IP addresses or the domain names of the computers used by Users who connect to the Site, the addresses in URI (Uniform Resource Identifier) format of the resources requested, the time when the request is made, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server (e.g. OK, error, etc.) and other parameters concerning the User's operating system and computer environment. These data are used solely for the purpose of obtaining anonymous statistical information on Site utilization, to check that the Site is working properly, and to improve the User browsing experience. They are deleted immediately after processing. The data may be used to ascertain liability in the event of hypothetical cybercrimes to the detriment of the Site.

Data voluntarily provided by Users: the optional, explicit and voluntary dispatch of data in web forms or of electronic mail to the addresses indicated on this Site involves subsequent acquisition of the sender's address – necessary to respond to requests – as well as of any other personal data included in the message.

4. **Optional nature of provision of data**

Apart from what has been specified for browsing and cookies data, the User is free to provide his/her personal data to ask for the dispatch of informative material or other communications.

5. **How data are handled and processed**

Handling and processing is done by means of automated tools (e.g. using electronic procedures and supports) for the time strictly necessary to achieve the purposes for which the data have been collected and, in any case, in compliance with current relevant regulatory requirements. Specific security measures are observed to prevent loss of data, unlawful use or abuse and unauthorized access.

6. **Cookie handling**

Cookies are small pieces of text that a website, when visited by a user, sends to the user's browser. These text cookies are then stored on the user's computer and are used by the same website the next time the user browses them. When browsing a website, users can also be sent cookies which come from different sites or web servers (so-called "third parties"), which can be included in various elements (for example, images, maps, sounds and specific links to pages of other domains) found on the same site as the one that the user is browsing.

Cookies can have different functions:

- *Technical cookies* allow websites to remember the user while browsing a website;
- *Analytical cookies* collect aggregated information concerning the most frequently visited sections of websites and monitor the promotional messages conveyed from the website, in order to enhance contents and facilitate consultation;
- *Profiling cookies* are aimed at creating profiles related to the user, based on the browsing experience of both individual websites and of general web navigation. These cookies are used to send advertising messages in line with the preferences shown by the user whilst surfing the net.

Cookies installed from www.hotelsantelena.com

- **Technical cookies:**
They can be divided into browsing or session cookies, which ensure normal browsing and use of a website (allowing you, for example, to make a purchase or to login to access a restricted area); analytics cookies, which are integrated with technical cookies when used directly by the website manager to collect

information, in aggregate form, on the number of users and how they browse the website; and functionality cookies, which allow browsing for users on the basis of a set of selected criteria (for example, language or the products selected for purchase) in order to improve the service offered to users. To install (save) these cookies, prior consent from users is not required. You can find further information on the individual use of cookies that we use and what they are used for in the following table.

| Cookie | Name | Type | What are they used for | Expiration | More info |
|------------------|--|----------------------------|--|--|--|
| BW Cookie | donotviewcookiemsg | Browsing / session cookies | This cookie saves the consent to install profiling cookies | Never | |
| Website Session | .ASPXANONYMOUSASP.NET_SessionId, ASPSESSIONIDQABRCA CD, _storejs_, _atuvc, _atuv, ASP.NET_SessionId | Browsing / session cookies | These cookies store information about your settings (language, property preference, etc.), and allow us to personalise the website | Session | |
| Google Analytics | _utma, _utmb, _utmc, _utmt, _utmz | Cookie analytics | These cookies are used to collect information about the way users browse our website. We use this information to create relationships about user traffic on the website, for conversion statistics and to improve the website in general. The cookies collect information in an anonymous form | _utma: 2 years _utmb: session _utmc: session _utmt: session _utmz: 6 months | Click here for a privacy recap on Google Analytics |
| AddThis | bku, cw_id, loc, mus, na_id, na_tc, ouid, ssc, uid, uvc | Functional cookies | These cookies are not closely linked to our website. They allow the user to share Site content on social networks and through various message platforms | bku: 1 year cw_id: 1 month loc: 390 days mus: 390 days na_id: 390 days na_tc: 390 days ouid: 390 days ssc: 390 days uid: 390 days uvc: 390 days | Click here for a privacy recap on AddThis |
| TripAdvisor | CM, PAC, PMC, SFP, ServerPool, TAAuth3, TACds, TART, TALanguage, TASSK, TASession, TASocialNetwork, TATravelInfo, TAUD, TAUnique, VRMCID_gads, fbm_162729813767876 | Functional cookies | These cookies are not closely linked to our website. They allow the use of TripAdvisor content to be integrated into our website | CM: 10 years PAC: 2 years PMC: 2 years ServerPool: session TAAuth3: 10 years TACds: 2 months TART: 5 days TASSK: 6 months TASession: session TATravelInfo: 15 days TAUD: 15 days TAUnique: 2 years VRMCID: 2 years | Click here for a privacy recap on TripAdvisor |

- **Third-party profiling cookies:**
These cookies are used to create an anonymous user profile based on your browsing experience on this website and on other websites. In this way, during

your internet browsing, you will receive targeted advertising based on your interests rather than generic advertising. These cookies are not managed by our company and are known as *third-party cookies*.

You can find further information on the individual use of cookies that we use and what they are used for in the following table

| Cookie | Name | Type | What are they used for | Expiration | More info |
|--------------------------|------------------|---------------------|---|------------|---|
| Facebook Custom Audience | fr | Advertising cookies | These Remarketing and Behavioural Targeting cookies are provided by Facebook, Inc. they link the activity of this website with the Facebook advertising network | 3 months | Click here for a privacy recap on Facebook |
| DoubleClick | IDE, test_cookie | Advertising cookies | These cookies are not closely linked to our site. They allow third party advertisements to be updated as the user browses the internet | 1 year | Click here for a privacy recap on DoubleClick |

Links to social network plug-in cookies:

This Website uses social network plug-in cookies from various third parties. This allows you to share the contents of the Website on specific social networks. Thanks to these plug-ins, using the Website becomes much easier. The use of data collected by third parties through social network plug-ins is determined exclusively by the third parties concerned. Hotel is not able to access these cookies and third parties cannot access cookies from the Hotel.

You can find further information on the individual use of cookies that we use and what they are used for in the following table.

| Cookie | Name | Type | What are they used for | Expiration | More info |
|-----------|---|---------------------|---|------------|---|
| Pinterest | _pinterest_cm, csrtoken, _b | Advertising cookies | These cookies are used for the "pin it" button functionality on the website | | Click here for a privacy recap on Pinterest |
| Google+ | APISID, GoogleAccountsLocale_session, HSID, NID, PREF, SAPISID, SID, SSID | Advertising cookies | These cookies are used for the "+1" button functionality on the website | | Click here for a privacy recap on Google+ |
| Twitter | _ga, guest_id | Advertising cookies | These cookies are used for the sharing button functionality on Twitter | | Click here for a privacy recap on Twitter |
| Facebook | csr, datr, fm, lu, s, xs, c_user | Advertising cookies | These cookies are used for the "Like" button functionality on the website | | Click here for a privacy recap on Facebook |

Options regarding the use of cookies

Upon your first access to the website, a banner appeared on your screen. If you have clicked the "X" on the banner itself or have continued browsing our website, you automatically consent to the collection and use of cookies by the Hotel.

Anyway, you can then change your browser settings so that cookies are deleted or not saved on your computer or mobile device without your explicit consent. The following links help you better understand how to set your *browser*:

- o Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

- Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>
- Google Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- Safari: <https://support.apple.com/en-us/guide/safari/manage-cookies-and-website-data-sfri11471/mac>
- Opera: <http://www.opera.com/browser/tutorials/security/privacy/>

We would like to highlight that, if you disable cookies, you will not have access to the many features that make this Website more efficient.

7. **Communication of data to third parties**

Saving any handling and processing performed by third parties appointed by the Hotel to manage the Site, duly appointed as external processors, no information collected during Users' browsing of the Site is communicated to third parties or disclosed.

8. **Rights of those concerned**

You will be able to: (I) to obtain confirmation of the existence or non-existence of your personal data; (II) know the purposes and methods of data processing, the recipients of the data, the conservation period; (III) obtain the correction or the cancellation of data, and where applicable, the limitation of data processing; (IV) object to the processing; (V) where applicable, receive your personal data provided by the Company in a structured, common format and readable by automatic device. You will also be able to transmit such data to another data controller without impediments by the Company; (VI) propose a complaint to the Guarantor for the protection of personal data.

Requests should be sent to the fax 041 2771569, via e-mail to the address info@hotelsantelena.com or by recorded-delivery letter to the following address: H.n.h. Hotels & Resorts SpA - Trinity Palace - Via Saragat, 1 - Mestre - Venezia (VE).

9. **Links to other websites**

This privacy statement refers exclusively to the Site. The Site contains links to third-party websites, over which the Hotel has no form of control. Hotel will therefore not in any way be responsible for any handling and processing of personal data performed by such third parties.