



PRIVACY POLICY

In accordance with Article 13 of the EU's General Data Protection Regulation (GDPR) 2016/679 of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and which replaces the Data Protection Directive 95/46/EC

Dear Customer, Employee or Supplier,

Hotel Lugano Dante Center is the Data Controller for the personal data of its customers (data subjects) that it processes in providing its accommodation services. We accept all ethical and legal liability regarding our customers, in accordance with the EU's General Data Protection Regulation (GDPR) 2016/679 of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and which replaces the Data Protection Directive 95/46/EC.

We put the same care into protecting the personal data of our customers as we do to providing them with accommodation services. As such, we are committed to informing our customers, in a complete and timely manner, about the purposes and methods used in processing their personal data. This information is provided in specific privacy policy statements that are readily available on our website. We also take steps to request and obtain consent from data subjects to process their personal data whenever necessary to achieve the purposes indicated.

Furthermore, to enhance the future stay of our guests, we request consent to authorize the Hotel to process information about guest preferences. These preferences may include specific information such as food intolerances, that can enable Hotel Lugano Dante Center to provide more personalized services. This data is processed using automated electronic tools (e.g. My Page).

Processing third-party personal data presents risks to the protection of this data. The loss of availability, integrity or confidentiality of personal data can significantly impact the fundamental rights and freedoms of data subjects. Violations of the GDPR can result in heavy administrative fines or reputational damage. To prevent these risks, we adhere to the following guidelines:

1. processing personal data in accordance with principles of lawfulness, fairness and transparency;
2. not processing data for purposes other than those specified;
3. teaching and training our employees and suppliers about compliance with this guidance, which they must apply in processing the personal data used in performing their duties, including the guidelines stated in this privacy policy;
4. ensuring that the personal data processed is adequate, relevant and limited to what is necessary to fulfill the purposes for which the personal data is processed ("data minimization");
5. ensuring that the personal data processed is accurate and updated as necessary;
6. taking all reasonable steps to correct or erase, as soon as possible, any data that is inaccurate with regard to the purposes for which the personal data is processed ("accuracy");
7. keeping the personal data processed in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
8. processing personal data securely, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures, also referred to as "operational controls" ("integrity and confidentiality"). Carefully



adopting all organizational and IT controls and all measures regarding the physical environment, in line with stipulations stated in policies, procedures, training and awareness plans, etc.

If you detect any weak points in the processing of personal data (“vulnerabilities”), violations to this policy or incidents involving the loss of availability, integrity or confidentiality of the personal data processed, you should immediately report them to the Data Controller.

We would like to thank all recipients of this policy for their collaboration and for providing any information or support necessary regarding privacy issues via the following email address: privacy@hotel-luganodante.com.

Hotel Lugano Dante Center SA