

Privacy Policy

Last updated: August 2025

This document (the “**Privacy Policy**”) is intended to provide certain information, also pursuant to Article 13 of Regulation (EU) 2016/679 (“**GDPR**”), concerning the processing of personal data of users collected and/or provided through the website www.poltuquatu.com (the “**Website**”). Any data provided to us or obtained through the Website in the course of using the related services shall be processed in accordance with the applicable data protection laws.

Before providing any personal data and making use of the services available on the Website, you are kindly requested to read this Privacy Policy carefully.

1. Data Controller

The data controller is Gem Hospitality S.r.l., with registered office in Via Giacomo Puccini, 3 - 20121 - Milan, Tax Code and VAT No. 13421430961, e-mail gemhospitalitysrl@legalmail.it (hereinafter, “**Gem Hospitality**” or the “**Data Controller**”), which is part of the Marriott Group.

The Data Controller has appointed its Data Protection Officer (“**DPO**”), who can be contacted at the following e-mail address: l.tarullo@inlinesrl.com.

1. Categories of personal data processed

The following categories of personal data relating to users of the Website shall be processed:

- **identification and contact details** (e.g. name, surname, e-mail address);
- **other data** provided in the “Book a table” section of the Website or when interacting with the Website (please refer to the following section 4 “Interactions with the Website”);
- **browsing or technical data** (e.g. device IP address, URI/URL addresses, http response code, browser parameters, etc.). With regard to data collected through cookies installed on the Website, please refer to the Cookie Policy accessible by clicking the following links: <https://www.poltuquatu.com/it/cookie-declaration>
<https://www.poltuquatu.com/en/cookie-declaration/>

1. Purpose and legal basis of processing

Browsing the Website is free.

Personal data will be collected and processed for the purposes and on the legal bases set out below.

There is no obligation to provide personal data, although failure to provide such data, or providing partial or inaccurate data, may prevent you from using the services made available on the Website from time to time.

- **Processing necessary for the provision of services through the Website or for the adoption of pre-contractual measures**

Based on the contractual obligations related to the services offered/provided through the Website, as well as based on any pre-contractual measures taken or to be taken at the user’s request, personal data may be processed:

- to allow navigation and use of the services on the Website;
- to manage any contact requests or requests for interaction from users;
- to manage any requests for assistance and/or support in using the Website;

- **Compliance with legal or regulatory obligations**

Based on the legal and/or regulatory obligations applicable to the Data Controller, personal data may be processed for:

- fulfilling the legal obligations to which the Data Controller is subject or any orders from the competent authorities;
- to inform or respond to requests from the competent authorities for the purpose of assessing liability in the event of damage to the Website, as well as for the prevention of criminal offences;
- fulfilling any accounting, tax and administrative obligations related to the provision of the services available on the Website.
- **Pursuit of legitimate interests**

Based on the legitimate interest of the Data Controller, which coincides with the need to improve and protect the Website, personal data may also be processed for:

- prevent fraud of any kind from being committed through the Website;
- ascertain, exercise or defend a right of the Data Controller in pre-litigation or judicial proceedings;
- improve the services offered and/or provided through the Website.

Furthermore, based on the legitimate interest of the Data Controller and/or the Marriott Group, users' personal data may be processed to conduct and/or conclude extraordinary corporate transactions (*e.g.*, mergers, acquisitions, disposals and/or purchases of business units, *etc.*). In this case, the personal data of users of the Website may be evaluated and/or disclosed to third parties, potential buyers or sellers, and consultants, in the context of the transaction and at every stage related to it (*e.g.*, due diligence, signing of insurance policies, *etc.*), based on appropriate safeguards (data aggregation, pseudonymisation, *etc.*).

- **User consent**

Based on the consent of users, their personal contact details (*i.e.* e-mail address) may be processed in order to receive the newsletter service offered by the Data Controller.

This service is intended to enable users who so wish to stay informed about news, activities, experiences and offers from Poltu Quatu and the Marriott Group. Consent to receive the newsletter may be withdrawn at any time by using the "unsubscribe" function available at the bottom of each communication received, or by following the procedure set out in Section 7 ("Rights of Data Subjects") of this document.

1. **Interactions with the Website**

The Website provides various means of interaction with the user. In particular, users may, via the Website, book experiences at the facilities and restaurants or subscribe to the newsletter in order to receive news and updates relating to the world of Poltu Quatu.

If the user decides to select one or more options for interaction with the Website, the latter may collect additional categories of personal data from the user (including, but not limited to, information relating to the time of booking, the type of experience booked, *etc.*).

Such personal data will be processed on the basis of regulatory or legal obligations incumbent on the Data Controller, contractual obligations related to the services offered/provided through the Website, on the basis of the consent given and on the basis of any pre-contractual measures taken or to be taken at the user's request, or on the legal bases and in the manner that may be disclosed to the user through the information on the processing of personal data made available from time to time by the Data Controller, including through the Website.

1. Categories of recipients of personal data

Personal data may be disclosed to the following categories of subjects:

- employees and collaborators of the Data Controller, to the extent necessary to fulfil a request made by the user on the Website;
- suppliers who provide maintenance and assistance services for the information systems and hosting of the Website, as well as additional suppliers of services that may be made available and/or accessible through the Website and which may be used (e.g. newsletters);
- freelancers, professional firms or associations appointed to defend and/or protect the interests of the Data Controller, including in pre-litigation or in proceedings of any kind;
- Marriott Group: the Data Controller may disclose the personal data of users of the Website to other companies in the Marriott Group for the purposes indicated in this Privacy Policy or to provide and personalise services, communicate with the users, promote loyalty programmes and achieve Marriott Group business objectives, as well as to make reservations at Marriott Group properties;
- Public security authorities, judicial authorities, entities or bodies to whom it is mandatory to disclose personal data pursuant to legal provisions or orders from the competent authorities.

The data communicated will be exclusively those necessary to achieve the purposes for which they were provided or collected.

In the event of transfer of personal data to countries outside the European Economic Area, such transfer will be carried out in accordance with the provisions of Articles 44 *et seq.* of the GDPR. In particular, the transfer may take place on the basis of an adequacy decision adopted by the European Commission (Article 45 of the GDPR) or, for those third countries where no such decision has been made by the Commission, on the basis of “adequate safeguards” whereby the Data Controller undertakes to ensure an adequate level of protection of personal data in accordance with Article 46 of the GDPR.

1. Retention periods

Personal data will be retained for a period not exceeding that necessary for the purposes for which it was collected, provided or subsequently processed, and in compliance with applicable legal provisions. In particular:

- any data contained in invoices or other accounting documents produced in connection with the services provided through the Website will be retained for 10 years;
- contact and browsing data will be processed for the time strictly necessary for the use of the Website and, in particular, for a maximum of 7 days ;
- contact details provided by the user to use the newsletter service will be deleted after 24 months from the date of subscription, without prejudice to the user’s right to withdraw their consent at any time and the Data Controller’s right to ask the user to renew their consent to receive marketing communications;
- if the right to erasure is exercised, the data may be stored in a secure form with limited access (where necessary for the purposes of investigating and prosecuting crimes) for a period not exceeding 12 months from the date of the request, after which it will be deleted or anonymised, unless there is another legal basis for processing.

At the end of the retention period, personal data will be deleted and/or anonymised in an irreversible manner, without prejudice to the need to protect a right of the Data Controller in the competent forums (which may make it necessary to further retain the data).

1. Rights of data subjects

At any time, the subjects to whom the personal data refer may obtain clarity on the processing carried out on their personal data and exercise the rights referred to in Articles 15 *et seq.* of the GDPR, within the limits and in the manner provided therein. By way of example, the following rights may be exercised:

- **Right of access:** request confirmation from the Data Controller that your personal data is being processed and what processing is being carried out. You may also request that the Data Controller provide you with a copy of your data by email and verify what data is held by the Data Controller;
- **Right to rectification:** modify the data if it is incorrect or complete incomplete data;
- **Right to erasure:** to erase, in whole or in part, the data provided;
- **Right to restriction:** restrict the processing of personal data in the cases provided for by law;
- **Right to portability:** obtain, in a structured, commonly used and machine-readable format, the data provided or request that it be transmitted to another data controller;
- **Withdrawal of consent:** if the processing is based on consent, the user may withdraw it at any time, without prejudice to the lawfulness of the processing carried out prior to withdrawal;
- **Right not to be subject to automated decision-making:** request the Data Controller (where applicable) not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- **Right to lodge a complaint with the Data Protection Authority:** without prejudice to any other administrative or judicial remedy, you may lodge a complaint with the Italian Data Protection Authority if you believe that the processing of your personal data infringes applicable data protection legislation. Further information is available on the Authority's website (www.garanteprivacy.it).

You may send any request for information or exercise the above rights by writing an email to the DPO at the following address: l.tarullo@inlinesrl.com.

1. Other websites

The Website may contain links to third-party services, sites, applications and/or platforms (including, for example, sites where you can make reservations at Marriott Group properties, location service providers such as Google Maps, social network providers such as Instagram, etc.) through specific *links* or other connection methods (e.g. APIs) made available through the Website. Access to and consultation of such sites, services, applications or platforms remain outside the scope of the activities, controls and/or security measures adopted by the Data Controller to protect personal data. In such cases, the Data Controller assumes no responsibility for the processing of data carried out by operators of other sites and/or applications. To this end, please read the terms of use and privacy policies of these sites, services, applications or platforms carefully to understand how your personal data will be processed.

1. Updates

The Data Controller reserves the right to modify this Privacy Policy if necessary in relation to any changes to the services made available on the Website and the manner in which they are used, as well as to ensure that this document complies with any changes to the legislation on the protection of personal data or in the event of any instructions from the competent authorities. To this end, please consult this page periodically to remain informed about the methods of processing personal data implemented by the Data Controller.

