

Clients and Users Privacy Policy

A. Data controller

We wish to inform you that the personal data that you submit in the context of our contractual relation will be processed by Room Mate Rome 3 S.R.L. Vía XXVII Aprile 3, 50129 Firenze, Italia, for the purposes described below.

Unless expressly indicated otherwise at the time of the data collection, all the personal data are required as essential elements for the management, maintenance and control of our contractual relation and for the services provided in our Website. Failure to provide this data will make it impossible to process your application or provide the service you have contracted. The personal data shall be collected exclusively for the purposes indicated in this Privacy Policy.

You hereby confirm and guarantee the truth and accuracy of the data provided and that they reflect your current status. In this regard, you undertake to notify us of any changes to these data in accordance with the procedure established in section **E. Rights of the data subjects.**

B. Purposes of processing

We inform you that your data will be processed by Room Mate Rome 3 S.R.L. for the following purposes:

i. *Based on the contractual agreement:*

- a. To manage your booking through any of the channels provided to this effect and to process your registration as an Apartment customer, and for the subsequent business relation with you, as well as
- b. Managing, maintaining and effectively controlling the relation resulting from having contracted Room Mate Rome 3 S.R.L. goods or services.
- c. To proceed to charge the designated amounts in the event of a booking cancellation outside the established time frame, as appropriate.

To manage customers', stay at Room Mate Rome 3 S.R.L., in addition to providing the services requested during their visit, which includes, among other aspects, preparation of the visit and dealing with any requests made during their stay. For this purpose, we may request data, such as the age of any minors who are guests in order to prepare the room with a cot, if needed, or any pertinent health data of guests required to manage their stay in an adequate manner, and to prepare the appropriate food menus. This also includes invoicing and charging for services consumed during their stay.

ii. *Based on legal obligations:*

- a. Notify the public authorities or regulatory or government bodies in those cases where it is necessary to do so under law, local by-laws or in compliance with regulatory requirements.

iii. Based on Room Mate Rome 3 S.R.L.'s legitimate interests

- a. Carry out commercial actions and/or advertising communications through any medium including electronic or equivalent communications relating to goods or services similar to those contracted with Room Mate Rome 3 S.R.L..
- b. Create profiles based on the personal data available to Room Mate Rome 3 S.R.L. in order to ascertain the goods and services most appropriate to your profile, thus maximizing their results and in this way offering you the best of any goods and services of interest to you.
- c. To carry out customer satisfaction surveys with the goods and/or services you have contracted in order to assess your satisfaction so that Room Mate Rome 3 S.R.L. can improve its processes and services.
- d. To manage, process and respond to any possible complaints or claims.
- e. To record your voice and/or image and save the telephone conversation and/or video having expressly informed you of this fact. It is in Room Mate Rome 3 S.R.L.'s legitimate interests to maintain the quality of its service and to use the recordings, should it be necessary to protect its legal position in the event of any possible conflict.

iv. Based on your explicit consent:

- a. Should you so authorize, Room Mate Rome 3 S.R.L. may offer you goods and services other than those that you have contracted, including electronic or any other medium, as well as third party products that may interest you, even when this contractual relation has ended.
- b. If you so authorize, Room Mate Rome 3 S.R.L. will communicate your personal data and your commercial profile to third party companies in order to send you communications advertising their goods and services through any medium, including electronic channels, even when this contractual relation has ended. These companies may belong to the following sectors: infant and childcare products, food and nutrition, training and education, publishing, financial and credit, insurance, housing, health and pharmacy products, leisure, large consumption, automotive industry, personal care, computing, electronics, telecommunications, water, energy and transports, tourism and travel, real state, toys, garments, NGO's and products/services for animals and pets,
- c. If you so authorize, Room Mate Rome 3 S.R.L. may create a profile detailing your consumer habits using internal and external information, arising, for example, from sources accessible to the public (promotional census, list of persons who belong to professional groups or open social networks, among others), in order to advertise special offers on goods or services tailored to your needs. It may also communicate your data to third parties allow Room Mate Rome to show you advertisements about goods and services adjusted to your preferences when you visit other websites, or use social networks, even when this contractual relation has ended.

In case you request to subscribe to the newsletter

Should you so authorize, your personal data will be processed for the sole purpose of managing your subscription to the newsletter, as well as the delivery of the same.

In case you request access to the news section of the website

Should you so authorize, your personal data will be processed for the sole purpose of granting access to the news section of the webpage, providing you a username and password.

C. Addressees

Room Mate Rome 3 S.R.L. may communicate your personal data in the terms described in section **B. Purposes of processing** to the following entities:

- i. Public authorities or regulatory or government bodies in those cases where it is necessary to do so under law, in accordance with local bylaws or in compliance with regulatory requirements.
- ii. Third party entities for the purposes described in section f) iii) Legitimate Interest, and sections b) and c) iv) Consent and collection in Section **B. Purposes of processing**.

Aside from the aforementioned data communications, Room Mate Rome 3 S.R.L. also collaborates with some third-party service providers who have access to your personal data and who process the aforementioned data on behalf of Room Mate Rome 3 S.R.L. as a result of a provision of services.

Room Mate Rome 3 S.R.L. pursues strict selection criteria for its service providers in order to comply with its obligations in data protection matters and undertakes to enter into the corresponding data processing agreements through which, among other obligations, it shall impose the following requirements, application of technical and organizational means; processing of personal data for the agreed purposes and only in accordance with written instructions from Room Mate Rome 3 S.R.L.; and deleting or returning data to Room Mate Rome 3 S.R.L. when the provision of services is complete.

Specifically, Room Mate Rome 3 S.R.L. will contract the provision of service from third party suppliers who, by way of example without limitation, perform their activity in the following sectors: logistics and legal advisory services, approval of suppliers, professional service companies, companies relating to maintenance, technological service providers, IT service providers, physical security, instant messaging and call center companies.

D. Data sources

In addition to the personal data that you have provided, Room Mate Rome 3 S.R.L. may also process personal data obtained from common files, sector files and /or public bodies, in accordance with the purposes and legitimate grounds described in section **B "Purposes of processing"** above.

In accordance with the foregoing, Room Mate Rome 3 S.R.L. will process the personal data facilitated by the aforementioned third parties from the following categories:

- i. Identification data
- ii. Postal or email addresses

Specially protected personal data will not be obtained.

E. Data processing coupled with mere navigation through the website

In order to improve our services, to provide you with more relevant content and to analyze how visitors use this website, we may use technologies, such as cookies or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

Nevertheless, when said technologies are personally identifiable, Room Mate Rome 3 S.R.L. will process your personal data based on its legitimate interest of providing you with the best service on the website and in the evaluation, improvement and simplification of the performance of our website.

Regarding the use of cookies on this website, please note that the same are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on this website and allow us to provide features such as remembering aspects of your last search to make subsequent searches faster. You can delete cookies if you wish, as better detailed in our Cookie Policy.

F. Rights of the data subjects

You may revoke the consent granted in the cases indicated in this document at any time, on request. We inform you that, pursuant to current law, you are entitled to exercise your rights of access, rectification, cancellation and opposition, as well the right to deletion, restriction of processing and right to portability of your data, by attesting to your identity (by means of a copy of your national or equivalent identity document) at the following address: Room Mate Rome 3 S.R.L. Via XXVII Aprile 3, 50129 Firenze, Italia or to the following email privacy@experiencebyrm.com

If you consider that Room Mate Rome 3 S.R.L. has failed to comply with the aforementioned rights, you may file a complaint with the Italian Data Protection Authority.

G. Conservation

Your personal data will be kept throughout the period of your contractual relation with Room Mate Rome 3 S.R.L.. In case we process personal data based on the consent granted, your personal data will be kept until you revoke said consent.

Upon termination of the agreement, your personal data will be deleted as soon as all the actions required to manage and conclude any obligation remaining between the parties have been completed, carrying out all the administrative formalities required during this period, except in those cases where mailing of commercial communications apply.

Without prejudice to the foregoing, your data will remain duly blocked while any liabilities resulting from execution of our contractual agreement remain, or any other legal obligations with which Room Mate Rome 3 S.R.L. is required to comply.

In this regard, Room Mate Rome 3 S.R.L. guarantees that it will not process the data unless this is necessary in order to formulate, exercise or defend any complaints or claims, or when it is required to do so in order to provide Public Authorities or Judges and Courts with the data during the limitation period of your legal rights or obligations.