



## INFORMATION

(on privacy within the meaning of GDPR - EU Regulation No 679/2016)

UIPA - Unione Italiana Portieri d'Albergo "Le Chiavi d'Oro-Les Clefs d'Or" in the figure of its pro-tempore President Mr. Federico Barbarossa - registered office in FLORENCE - via Antonio Giacomini, 28. - Tax Code 96331010585 - VAT 02371770906 - Email address: [segretario@lescledor.it](mailto:segretario@lescledor.it) / [Presidente@lescledor.it](mailto:Presidente@lescledor.it) is the owner of the processing of your personal data, or its identifiers, personal data and contact details.

### 1) Purpose of the treatments

UIPA will process the data in a lawful, correct and transparent manner in compliance with the principles of the European legislation on the protection of personal data (GDPR) for the following purposes:

- a) management of the request for admission to member of the association pursuant to the Statute of the organization
- b) administrative and accounting management of the annual membership
- c) service communications relating to projects and / or invitations to training seminars and events
- d) communication activities, promotion and publication of identifying images and events

The Entity will not process and publish identifying images of the Interested parties for purposes other than those listed, or further than those referred to in the Association's Statute, for example for marketing or profiling purposes, in specific cases it may prepare a specific Information and request specific consent to the interested party.

### 2) Processing methods.

The processing takes place through the use of paper, electronic tools, or the use of IT systems - via the web - in safety pursuant to articles 24 and 32 of the GDPR. The data are processed by persons duly authorized by the Association and trained in the treatment. The webmaster of the body's website ([www.lescledor.it](http://www.lescledor.it) and [www.ilbollettinodellechiavidoro.it](http://www.ilbollettinodellechiavidoro.it)) has also been appointed as External Manager of the treatments, who has received instructions for the processing of personal data pursuant to art. 28 of the GDPR.

### 3) Obligation of the conferment

The provision of your data is necessary and mandatory for the aforementioned purposes described in points a); b); c) and d). The refusal would make it impossible to join and participate in the Association. In case of further purposes, specific, free and informed consent will be required pursuant to art. 6 par. f) of the GDPR.

### 4) Communication of data

Your data may be communicated to UICH - International Union of Hotel Concierges - based in Paris as an international reference body and an independent data controller. Your data will not be disclosed to further third parties outside the European economic area.

### 5) Place and method of data storage

Personal data are stored with the Data Controller, on paper and / or computerized media and on physical and Cloud usually located within the European Community. If it were necessary to transfer the data to providers having Data Centers located in non-EU areas, the transfer would respect the guarantees established by EU Regulation 2016/679, having the Data Controller take care to choose the supplier that has adhered at least to the US Privacy Shield.

### 6) Data retention period

Your data will be kept for the entire period of validity of your status as a member or aspiring member, and for another two years from the loss of this qualification. After this deadline, they will be destroyed.



## 7) Rights of the interested party

You have the right to:

- ✓ access your personal data;
- ✓ obtain the correction or cancellation of the data or the limitation of the relative treatment;
- ✓ if the data is in electronic format, request portability;
- ✓ oppose the treatment;
- ✓ lodge a complaint with the supervisory authority.

You can assert your rights by contacting the owner; the Data Controller is required to respond to it within 30 days from the date of receipt of the request, (term that can be extended up to 90 days in case of particular complexity of the application). If you believe that the processing of your data does not comply with the current provisions or if the response to an instance with which you have exercised one or more of the rights indicated above or provided for in articles 15-22 of the GDPR, does not arrive within the time frame indicated or not satisfactory, you can contact the judicial authority or the Guarantor for the protection of personal data ([www.garanteperlaprotezionedeidati.it](http://www.garanteperlaprotezionedeidati.it))

## 8) Technical and organizational security measures

The Association undertakes to keep the following security measures updated and verified:

- ✓ Access control and traceability through ID and Password of different levels;
- ✓ Coding of Treatment with identification and partitioning of processes;
- ✓ Malware protection system;
- ✓ Minimization of the data processed.
- ✓ Storage of paper supports in protected places accessible only to authorized personnel;
- ✓ Storage of the server's physical media in a protected place and data backup;
- ✓ Conclusion of adequate contracts in compliance with the GDPR discipline;
- ✓ Instructions and periodic training of staff on the protection and processing of personal data.

This information was updated on April 9, 2020

Read and Informed