PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA
(EU REGULATION 2016/679 AND ITALIAN LEGISLATIVE DECREE 196/03, AS AMENDED AND SUPPLEMENTED)

Park Hyatt Milan (hereinafter also referred to as "Park Hyatt", "we", "us", or "our") places great importance on protecting the confidentiality of personal data. This Privacy Notice describes which personal data we collect or receive about you and how Park Hyatt uses such data. Our objective is to enable you to clearly understand which data we process, for what purposes, under which safeguards, and what your rights are.

DATA CONTROLLER

NEPA S.r.l., with registered office in Milan, 20121, Via Tommaso Grossi No. 1, Certified Email (PEC): nepasrl@pec.it, in the person of its legal representative, is the Data Controller of your personal data pursuant to and for the purposes of Italian Legislative Decree 196/2003, as amended and supplemented, and EU Regulation 2016/679 on the protection of personal data.

DATA PROTECTION OFFICER (DPO)

The Data Protection Officer may be contacted by mail at the registered office of NEPA S.r.l., Via Tommaso Grossi No. 1, 20121 Milan, Italy, or by email at dpo@hyatt.com.

CATEGORIES OF DATA

We collect personal data in various ways when you visit our websites, create an account, make reservations, stay at our Properties, use our services, communicate with us, or otherwise interact with our websites and Properties. The personal data we collect or receive may include the following categories of information:

A) Personal Data

- Identification Data: name, age, gender, passport details or other government-issued identification documents;
- Contact Information: residential address, ZIP/postal code, email address, and telephone number;
- Financial and Payment Information: credit card details, itemized charges, billing address, and transaction history;
- Reservation Information: type and location of reserved rooms, restaurant and spa reservations, booked experiences, other guests associated with your reservations, and reservation dates.

B) Special Categories of Personal Data

- Health Data: where provided and relevant for the provision of services (for example: allergies, food intolerances, special dietary requirements, reduced mobility information or facility-related needs, suitability for specific SPA treatments, temporary and necessary processing to provide immediate medical assistance or coordinate with healthcare providers in the event of an accident or illness).

C) Other Data

- Images: CCTV recordings, publicly available photographs, and images captured during events or during your stay;
- Preference Data: including, but not limited to, preferred pillow type and mattress firmness, special requests, interests, and information relating to previous experiences with us;
- Technical Data: information regarding the device used to interact with us (including hardware model, IP address, geolocation data, operating system and version, etc.).

PURPOSE OF PROCESSING

Processing of Data Referred to in Section A)

The collection and processing of the data referred to in Section A) are carried out for the following purposes:

1. To provide reservation services at our Properties and allow you to use our Services, both on-site and through our website;
2. To process transactions through our websites and assist you with transaction-related inquiries;
3. To invoice your stay or services provided at our Properties, confirm transactions, and reconcile statements or invoices;
4. To respond to specific requests for information regarding our Properties and manage any requests, correspondence, or complaints submitted by you;
5. To establish, exercise, or defend legal claims;
6. To comply with legal obligations.

Processing of Data Referred to in Section B)

The collection and processing of the data referred to in Section B) are carried out for the following purposes:

1. To ensure your food safety during meals served at the hotel or our hospitality facilities;
2. To ensure a safe and appropriate stay;
3. To verify your suitability for specific SPA treatments;
4. To provide immediate medical assistance or first aid and coordinate with healthcare authorities in the event of an accident or illness.

Processing of Data Referred to in Section C)

The collection and processing of the data referred to in Section C) are carried out for the following purposes:

1. To personalize and enhance your online experience as a Guest and/or Owner according to your preferences regarding our Properties, products, and services;
2. To send newsletters or marketing communications relating to our Properties or products and inform you about promotions or offers that may be of interest;
3. To conduct surveys or focus groups in order to collect your opinions regarding our Properties and service delivery;
4. To respond to requests for information about one or more Properties and manage any requests, correspondence, concerns, or complaints submitted by you;
5. For marketing, advertising, and promotional purposes, such as through online promotions or third-party social media networks, in accordance with your preferences and applicable laws;
6. To manage our business, including ensuring the safety of Guests, Owners, and Property staff, as well as for internal purposes such as audits, data analysis, statistical and research activities, and troubleshooting to improve our services.

LEGAL BASIS FOR PROCESSING

The legal basis for processing the data referred to in Section A) is the performance of contractual obligations and compliance with legal requirements.

The legal basis for processing the data referred to in Sections B) and C) is your explicit, specific, and freely revocable consent, which can be withdrawn at any time.

Methods of Processing

Data processing for the purposes described above is carried out using both automated methods, through electronic or IT-based systems, and non-automated methods, through paper-based records, in compliance with confidentiality and security requirements established by applicable laws, regulations, internal policies, and both national and European legislation.

Place of Processing

Data are currently processed and stored at the operational offices of the Data Controller located in Milan, 20121, Via Tommaso Grossi No. 1, and at Regus S.p.A., Via Mengoni No. 4, 20121 Milan, Italy.

Data Retention Period

Your personal data will be retained for a limited period of time, which varies according to the type of processing activity and its specific purposes.

Disclosure of Data to Third Parties

Your data may be disclosed to third parties (suppliers, consultants, etc.) acting on our behalf for the purpose of providing the services requested at our Properties. Such parties process personal data in accordance with the instructions provided by the Data Controller pursuant to Article 28 of the GDPR.

Transfer of Data Outside the EEA

Your personal data may be processed by the Data Controller and its third-party service providers anywhere in the world.

In such cases, we will implement appropriate measures to ensure that your personal data remain protected and secure when transferred outside your country. Such measures include data transfer agreements incorporating Standard Contractual Clauses, reliance on relevant adequacy decisions adopted by the European Commission or equivalent authorities, and other lawful transfer mechanisms permitted under applicable data protection legislation.

Data Subject Rights

We inform you that, in accordance with applicable legislation, you have the following rights:

- To request and obtain information regarding the existence of your personal data held by the Data Controller and access to such data;
- For data processed through automated means, to request data portability to another data controller;
- To request and obtain correction and/or updating of your personal data if you believe them to be inaccurate or incomplete;
- To request and obtain erasure and/or restriction of processing where such data are unnecessary or no longer necessary for the purposes for which they were collected, including after expiration of the applicable retention period.

In particular, you are entitled to exercise the rights set out in Articles 15 (Right of Access), 16 (Right to Rectification), 17 (Right to Erasure), 18 (Right to Restriction of Processing), and 20 (Right to Data Portability) of the GDPR, within the limits and conditions established by Article 12 of the Regulation.

Such requests may be addressed to the Data Controller by email at dpo@hyatt.com or by certified email (PEC) at nepasrl@pec.it.

You also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) at urp@gpdp.it.

CONSENT STATEMENTS

a) I authorize the processing of my health and special category personal data for the purposes of verifying my suitability for specific SPA treatments, ensuring my food safety during meals at the hotel or hospitality facilities, providing immediate medical assistance or first aid, coordinating with healthcare authorities in the event of an accident or illness, and ensuring a safe and appropriate stay.

YES NO

b) I authorize the processing of my personal data for participation in loyalty programs offered by Park Hyatt Milan or other entities within the Hyatt network.

YES NO

c) I authorize the processing of my personal data to receive information regarding events and activities organized by Park Hyatt Milan or other entities within the Hyatt network.

YES NO

d) I authorize the processing of my personal data to receive commercial and promotional information from Park Hyatt Milan or other entities within the Hyatt network.

YES NO

e) I authorize the processing and disclosure of my personal data to receive external messages and telephone calls.

YES NO

f) I authorize the sharing of my personal and sensitive data within entities belonging to the Hyatt network in order to improve my hospitality experience.

YES NO

g) I authorize the retention of my personal data in the Guest Database in order to benefit from an enhanced hospitality experience during future visits to any entity within the Hyatt network.

YES NO