

## Privacy Policy for Commercial Partners

This Privacy Policy is valid for Quadra Srl. Via E. De Nicola, 9, 50125 Montevarchi. Describes as Quadra SRL collects and processes personal data on current, past, or potential Travel Providers and on other business partners. Therefore, this Notice applies to the personal data of owners, employees, representatives, or other individuals acting on behalf of a Travel Provider or other partner commercial (Travel Providers, other business partners and individuals connected to them will henceforth be hereafter referred to collectively or individually with the term "Business Partners" or with pronouns such as "you").

A Business Partner, within the meaning attributed to it in this Privacy Policy, it could be a Travel Supplier (intended as an accommodation facility but also an attraction, park, museum etc.), a partner who makes it possible to book Trips through its websites, apps and / or other channels (including travel agencies), third party suppliers or other partners who have a commercial relationship with Quadra srl.

We also remind you that the data will also be processed by Keesy Srl as publisher and Host of the application.

## Collection Data

The personal data that Quadra SRL collects on Business Partners depend on the context of the relationship and commercial interaction that binds the Shareholders themselves to Quadra SRL, from the choices made by Business partner and the products, services and features it benefits from.

Personal data collected by Quadra SRL on a Business Partner may include the following (depending on the situation specification, not all of the following types of data can be considered personal as they may relate to a company rather than a private individual):

### Personal data you provide to us

- **Contact details**

We collect Business Partner contact details such as name and / or surname, date of birth (if required), business e-mail address and postal address, telephone and fax number.

- **Financial data**

We collect the data necessary for payment and billing, including bank details: current account number, VAT number and credit notes.

- **Data for verification**

As part of the registration process, Quadra Srl can ask the Business Partner or his representative to provide a copy of the identity card or passport, a photo, a video or other information relevant to verify the authenticity of the Business Partner.

## **Other**

While you communicate with Quadra srl, Quadra srl collects and processes communications.

During phone calls with our service centre, some communications may be heard by the live or recorded for quality control or training purposes, which includes the use of recordings for the management of complaints and the detection of fraud. Records are kept for one limited period of time, after which they are automatically deleted, unless Quadra srl has no legitimate interest in keeping them for a longer period, for legal purposes or for the fraud detection.

## **Other Information We Collect Automatically**

When you use Quadra srl online services such as the online registration form or a user account it also collects information automatically and some of this may be personal data, such as set the language, IP address, location, settings and operating system of the device, the registration information, usage time, requested URL, your status report, user agent, browsing history, the user's reservation number and the type of data displayed.

By sharing the personal data of other individuals (e.g. members of your staff) in connection with your business, you confirm that these individuals have been informed of the use of their personal data by QUADRA SRL in accordance with this Privacy Policy and who have given their consent where required.

## **Other information we receive from other sources:**

- Information on insolvencies

In cases of insolvency, Quadra srl can receive information from insolvency administrators, from courts or other public authorities in relation to a Business Partner.

- Data relating to requests from law enforcement and tax authorities

Law enforcement and tax authorities can contact Quadra srl and provide information additional information on Business Partners if they are involved in an investigation.

- Fraud detection

In some cases, and as allowed by current legislation, Quadra srl may need collect data through third-party sources in order to prevent and detect fraud.

## **Purpose of the collection**

Quadra Srl uses the information on the commercial partners mentioned above, some of which they could be personal data, for the following purposes:

### **A. Registration and Account Management**

Quadra srl uses account details, financial details and contact details to register [www.keyresidence.it](http://www.keyresidence.it), or [www.costa58.com](http://www.costa58.com), the verification or management of the commercial relationship with thePartner.

#### B. Customer Service

uses the information provided, possibly including personal data, to provide support services how to answer questions, concerns and questions from business partners.

#### C. Other activities, including marketing

if a business partner uses the online registration function and has not yet completed the procedure, Quadra srl may send a reminder to remind you to continue. We believe this an additional service may be useful to our future business partners as it allows them to continue registration without having to re-enter all the required data from scratch. Quadra srl could invite partners participate in events that you organize and that you think are of interest to a Business Partner, or may use personal data to offer and host online forums that enable business partners to find the answers to the most frequently asked questions on the use of Quadra srl services and on the offer of its products and services.

#### E. Statistics, improvement and research

Booking.com uses the information provided, which may include personal data, for analytical purposes. This is part of our commitment to improve Booking.com's services and user experience, but it can also be for testing, troubleshooting and improving the functionality and quality of the Booking.com's online services. Additionally, Booking.com regularly invites Business Partners to participate in surveys or other market research. Some Business Partners may be invited to join one dedicated online platform on which to interact with Booking.com itself and / or exchange experiences with others Business partners. To know how personal data could be treated differently from as described in this Privacy Policy, see the information provided in the invitation to respond to the survey, take part in market research or join the online platform.

#### F. Security, fraud prevention and detection

We process the information you provide, which may include personal data, for the purpose of investigating, preventing and detect fraud and other illegal or infringing activities. This information could be personal data that the Business Partner has provided to Booking.com, for example for verification purposes as part of the registration process, or personal data collected automatically, or personal data obtained from third-party sources (including customers). Booking.com may also use personal data to facilitate an action penalty, if necessary. For these purposes, personal data may be shared with law enforcement or with external consultants. Booking.com has the right to use personal data to assess risks or for purposes of security, including user authentication.

#### G. Legal Purposes and Compliance with Laws

In some cases, Booking.com must use the information provided, which may include personal data, for manage and resolve legal disputes, for government investigations and compliance, to enforce agreements with Business Partners or resolve a customer complaint in a reasonable manner. It is important to note that the information about the accommodation, including name and address, will be used in compliance with the General Terms and as part of the Contract with the Accommodation facilities entered into separately; for example displayed on third-party websites to allow the Booking of the Trip. If we use automated means to process personal data that produce legal effects or have an effect significant about you, we will take the necessary measures to safeguard your rights and freedoms, including the right to human intervention.

**Legal principles:** With regard to A and B purposes, Booking.com uses necessity as a legal basis to process personal data for the execution of the agreement between the Business Partner and Booking.com. If not the necessary information is provided, Booking.com cannot register a Travel Provider or work otherwise with a Business Partner, nor can it provide customer service. As for the purposes from C to G, Booking.com relies on its legitimate business interest to provide its services or obtain services from Business Partners, in order to prevent fraud and improve their service. When the data personal data are used for the legitimate interest of Booking.com or a third party, Booking.com will reconcile always the rights and interests of the Business Partner for the protection of his personal data and i rights and interests of Booking.com or the third party.

## Sharing of data

- Sharing with third parties. We share information about Business Partners (who may include personal data) with third parties as permitted by law and described below. Not we sell or rent personal data. o Service and product providers. We share your information with third party Service Providers to provide our products and services, store data or manage business on our behalf. These service providers will process personal data only as indicated by Quadra srl e to provide the services to the same o Payment Providers and other Financial Institutions. To process payments between a Partner commercial and Quadra srl or a user who books, personal data, if considered relevant, they will be shared with Payment Providers and other financial institutions o Mandatory disclosure. If required by law, where strictly necessary for to perform our services, in legal proceedings or to protect our or others' rights members of the Quadra srl group of companies. or users, we share personal data with law enforcement agencies, investigative organizations or other group members.

Sharing and disclosure of aggregate data: we may share information with third parties, for example for sector analysis and demographic profiling, in aggregate form and / or in a form that does not allows the recipient of such data to identify you.

## International data transfer

The transmission of personal data as described in this Privacy Policy may include the transfer overseas to countries that do not have comprehensive data protection laws e complete as those of the countries of the European Union. Where required by Community law, we will only transfer personal data to recipients who offer an adequate level of protection for personal data. In such circumstances it may be necessary to establish contractual measures to ensure that the protection of the data is in line with European standards.

## Safety

In compliance with European laws on the protection of personal data, Quadra srl observes suitable procedures to prevent information containing personal data from being accessed without authorization or used improperly. We use industry-specific systems and procedures to safeguard information that contains data personal. We also rely on security procedures and technical and physical restrictions to prevent access and use of personal data contained in our servers. Only authorized personnel can access to personal data while carrying out their work.

## Data retention

We will retain personal data for as long as we deem necessary to manage the relationship commercial with a commercial partner, provide the services of Quadra srl to a commercial partner, comply with applicable laws (including those relating to the conservation of documents), resolve disputes with any party and if otherwise necessary to allow Quadsra srl to carry out its own business. All personal information stored will

be subject to what is prescribed in this Privacy Policy and our internal retention guidelines. If you have any questions on specific data retention periods, contact us using the contact details below.

## **Your choices and your rights**

We want you to have control over how your personal data is processed. You can do it in the following ways:

- you can ask us for a copy of your personal data in our possession;
- you can inform us of any changes to your personal data or you can ask us to correct it any of your information in our possession;
- in specific situations, you can ask us to delete, block or limit your personal data in ours possession, or object to particular ways in which we are using your personal information; is
- in specific situations, you can also ask us to send your personal information to us possession to a third party.

When we use your personal data based on your consent, you have the right to withdraw that consent in any time under applicable law. Furthermore, when we process your personal data on the basis of a legitimate interest or a public interest, you have the right to object at any time to the use of yours personal data pursuant to applicable law.

We rely on you to ensure that your personal data is complete, accurate and current. Please notify us immediately if there are any changes or inaccuracies regarding your personal data.

## **Questions and complaints**

If you have any questions or concerns regarding the management of your personal data or if you want to exercise your envisaged rights as part of this Privacy Policy, please contact our Data Protection Officer at [a.mecacci@keyresidence.it](mailto:a.mecacci@keyresidence.it). All questions and complaints addressed to Quadra srl and regarding privacy will be examined; Quadra srl will attempt to resolve complaints and questions in line with internal procedures.

You can also contact your local data protection authority with any questions or complaints.

## **Changes to the information**

Since our activities are subject to change, so does this privacy policy could be changed. If we make any material changes or modifications that impact about you (for example if we start processing your personal data for purposes other than those outlined above), we will contact before starting.