



RomaSi Europe LLC – Privacy Policy

Last Updated May 1, 2019

RomaSi Europe values you, our clients and guests, and recognizes that privacy is important to you. We want to familiarize you with how we collect, use and disclose data.

This Privacy Statement describes the privacy practices of RomaSi Europe LLC for data that we collect through the following:

The website(s) operated by us from which you are accessing this Privacy Statement

Any social media services via handles that we control

Email messages that we send you that link to this Privacy Statement and through your email communications with us

When you book and use our services, or through other offline interactions

Collectively, we refer to the Websites and our Social Media Feeds, as the “Online Services” and, together with offline channels, the “Services.” By using the Online Services and the Services, you agree to the terms and conditions of this Privacy Statement.

Collection of Personal Data

“Personal Data” are data that identify you as an individual or relate to an identifiable individual.

We may collect Personal Data in accordance with law, such as:

Name

Gender

Postal address

Telephone number

Email address

Credit and debit card number or other payment data

Financial information in limited circumstances

Language preference

Date and place of birth

Nationality, passport, visa or other government-issued identification data

Employer details

Social media account ID, profile photo and other data publicly available, or data made available by linking your social media

If you submit any Personal Data about other people to us or our Service Providers, you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

How We Collect Personal Data

We collect Personal Data in a variety of ways:

Online Services. We may collect Personal Data when you make a reservation, purchase goods and services from our Website(s), communicate with us, or otherwise connect with us or post to Social Media Feeds, or sign up for a newsletter or participate in a survey, contest or promotional offer.

Offline Interactions. We may collect Personal Data when you use our “Services.” Services are defined as hotel or plane reservations, tours or excursions, and private transfers by vehicle.

Customer Contacts. We may collect Personal Data when you communicate with us by email, fax, telephone or via online chat services. Owners. We may collect Personal Data from owners of properties and services that we work with (“Owners”).

Other Sources. We may collect Personal Data from other sources, such as public databases or websites, joint marketing partners and other third parties.

Collection of Other Data

“Other Data” are data that generally do not reveal your specific identity or do not directly relate to an individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data.

Other Data includes:

Browser and device data
Data collected through cookies, pixel tags and other technologies
Demographic data and other data provided by you
Aggregated data

How We Collect Other Data

We collect Other Data in a variety of ways:

Your browser or device. We may collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services you are using. We may use this data to ensure that the Online Services function properly.

Cookies. We may collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies permit the collection of data such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We may use this data for security purposes, to facilitate navigation, to display data more effectively, to collect statistical data, to personalize your experience while using the Online Services and to recognize your computer to assist your use of the Online Services. We may also gather statistical data about use of the Online Services to improve design and functionality, understand how they are used and assist us with resolving questions. Cookies may further allow us to select which offers are most likely to appeal to you and display them while you are using the Online Services or to send marketing emails.

We may also use cookies to track responses to online advertisements and marketing emails. If you do not want data collected with cookies, you can learn more about controlling cookies at <http://www.allaboutcookies.org/manage-cookes/index.htm>.

Pixel Tags and other similar technologies. We may collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Online Services.

Your IP Address. We may collect your IP address, a number that is assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We may use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.

Aggregated Data. We may aggregate data that is collected and this aggregated data will not personally identify you or any other user.

Use of Personal Data and Other Data

We use Personal Data and Other Data to provide you with Services, to develop new offerings and to protect RomaSi Europe, our clients and guests as detailed below. In some instances, we will request that you provide Personal Data or Other Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

We will use Personal Data and Other Data to communicate with you with your consent, to manage our contractual relationship with you, to comply with legal obligations, and/or because we have a legitimate interest to do so. Without limiting the foregoing, we may use Personal Data and Other Data for our legitimate business interests, including the following:

Provide the Services you request. We use Personal Data and Other Data to provide Services you request, which may include:

To facilitate reservations, payment, send administrative information, confirmations or messages

To complete your reservation and to provide you with related customer service

To provide electronic receipts

Communicate with you about goods and services. We may use Personal Data and Other Data to send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys.

Activities, events and promotions. We may use Personal Data and Other Data to allow you to participate in promotions and to administer these activities.

Business Purposes. We may use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention, developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

Disclosure of Personal Data and Other Data

We may share Personal Data and Other Data with the following:

RomaSi Europe. We may disclose Personal Data and Other Data among corporate affiliates and subsidiaries of RomaSi Europe and among properties owned or managed by RomaSi Europe, for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, providing news and marketing information, and to accomplish our business purposes. RomaSi Europe LLC is the party responsible for the management of the jointly-used Personal Data.

Owners. We may disclose Personal Data and Other Data to Owners of RomaSi Europe managed properties and services for the purposes described in this Privacy Statement, such as providing and personalizing the Services and facilitating loyalty programs.

Service Providers. We may disclose Personal Data and Other Data to third-party service providers for the purposes described in this Privacy Statement. Examples of service providers include companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services, as well as owners of the properties and services we work with.

Other Uses and Disclosures

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the RomaSi Europe, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do, we will treat the combined data as Personal Data when it is combined.

Non RomaSi Europe Entities

This Privacy Statement does not address, and we are not responsible for the privacy, data or other practices of any entities outside of RomaSi Europe, including Owners, or any third party operating any site or service to which the Services link, payment service, loyalty program, or website that is the landing page of the high-speed Internet providers at our properties. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data. In addition, we are not responsible for the data collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, Amazon, any Owner or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through Apps or our Social Media Feeds.

Security

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contacting Us" section, below.

Links to Other Web Sites

In order to anticipate your needs, our Websites may provide links to other web sites and third parties for your convenience and information. We are not responsible for the collection, use, maintenance, sharing or disclosure of data (including Personal Data) by such third parties. We encourage you to contact these third parties to ask questions about their privacy practices, policies and security measures before disclosing any personal data. We recommend that you review the privacy statements and policies of linked web sites to understand how those web sites collect, use and store information.

Access and Retention

You have choices when it comes to how we use your data and we want to ensure you have the information to make the choices that are right for you. If you no longer want to receive marketing-related emails, you may opt out by following the instructions in any such email you receive from us or contacting us as described below. We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

Special Notice for California Residents: Customers who reside in California and have provided their Personal Data to us can request, once per calendar year, information about our sharing of certain categories of Personal Data to third parties and within RomaSi Europe, for their direct marketing purposes. Such requests should be submitted to us at info@romasieurope.com or by mail at:

RomaSi Europe
1715 Banks Road
Margate, Florida 33063

We will provide a list of the categories of Personal Data disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

How You Can Access, Change or Suppress Your Personal Data

If you would like to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by law), you can contact us at info@romasieurope.com or by mail at:

RomaSi Europe
1715 Banks Road
Margate, Florida 33063

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database, or other limitations you would like to put on our use of your Personal Data. For your protection, we only fulfill requests for the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable. Please note that we often need to retain certain data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

Retention

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

The length of time we have an ongoing relationship with you and provide the Services to you;

Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); and

Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations).

Sensitive Data

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

Use of Services by Minors

The Services are not directed to individuals under the age of eighteen (18), and we request that they not provide Personal Data through the Services.

Updates to This Privacy Statement

The "LAST UPDATED" date at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. Your use of the Services following these changes means that you accept the revised Privacy Statement.

Contacting Us

If you have any questions about this Privacy Statement, please contact us at info@romasieurope.com, or by mail at:

RomaSi Europe
1715 Banks Road
Margate, Florida 33063