

	Documentazione di Sistema - GDPR 2016/679	Modello	INF09
	Web Hotel Revenue S.r.l. Via Caio Mario 7 – 00192 Roma P.IVA 11087061005	Revisione	1 aggiornata al 24-03-2025
			Pagina 1 di 4
PRIVACY POLICY			

This page describes the methods of management of the website in relation to the processing of personal data of users who consult it. This information is also provided pursuant to art. 13 of EU Regulation 2016/679 - General Regulation for the Protection of Personal Data (hereinafter referred to as GDPR - General Data Protection Regulation) to those who interact with the web services of Web Hotel Revenue S.r.l., accessible electronically from the electronic address:

<https://revolution-plus.tech>

The information is provided only for the website indicated and not for other websites that may be consulted by the user via links or for any "social sharing buttons" present on the same.

DATA CONTROLLER

Pursuant to art. 4 point 7 of the GDPR 2016/679, the data controller is the company Web Hotel Revenue S.r.l., with registered office in Rome (Italy), Via Caio Mario, 7 – 00192 Rome, in the person of its Legal Representative.

DATA PROCESSORS

In the context of the processing of your personal data, external parties formally designated by the Data Controller as Data Processors pursuant to art. 28 of EU Reg. 2016/679 may be involved.

The complete list may be requested from the Data Controller.

PLACE OF DATA PROCESSING

The processing operations connected to the web services of this site take place at the headquarters of the data controller company and at the site hosting company and are handled only by technical personnel of the service in charge of processing. No data deriving from the web service is communicated or disseminated externally unless specifically provided for.

TYPES OF DATA PROCESSED

Navigation data

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment.

This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site: except for this eventuality, at present the data on web contacts do not persist for more than thirty days.

Data provided voluntarily by the user

The optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. Even the compilation of a form on the pages of the same site entails the subsequent acquisition of the data provided voluntarily by the person who filled it in for the specific purposes described below.

The site contains links to social channels and platforms: in such cases the responsibility lies with the individual manager of the tool and the user must take care to consult the relevant privacy policy.

COOKIES

	Documentazione di Sistema - GDPR 2016/679	Modello	INF09
	Web Hotel Revenue S.r.l. Via Caio Mario 7 – 00192 Roma P.IVA 11087061005	Revisione	1 aggiornata al 24-03-2025
			Pagina 2 di 4
PRIVACY POLICY			

For a detailed description of the processing methods carried out through Cookies or other tracking tools, please refer to the “Cookie policy” in the so-called “cookie banner” as well as, for further information, to the Guidelines adopted by the Guarantor Authority on 06.10.2021, which can be consulted [here](#).

PROCESSING METHODS

Personal data are processed with automated tools for the time necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

PURPOSE, LEGAL BASIS AND NATURE OF THE PROVISION

The Personal Data collected through the Website will be processed by the Data Controller for the following purposes:

1. Respond to specific requests from the interested party in relation to the services offered, request quotes or more information on our activities, through computerized communication systems (e.g. forms on the site, chat or instant messaging solutions). Consent Not required. The legal basis, which guarantees the lawfulness of the processing, is identified in Article 6 par. 1 letter b) of EU Reg. 2016/679, i.e. the processing is necessary for the performance of a contract to which the interested party is a party or for the performance of pre-contractual measures adopted at the request of the same;
2. Register voluntarily for the company newsletter. Consent Necessary. The legal basis is identified in Article 6 par. 1 letter b) of EU Reg. a) of EU Regulation 2016/679 or the processing is possible with the explicit consent of the interested party;
3. Research and statistical analysis on anonymous aggregate data, aimed at measuring the functioning of the Site, measuring traffic and evaluating usability and interest to make it more functional and performing; Consent Not necessary as it does not constitute the processing of personal data;
4. Compliance with the obligations required by laws and regulations; Consent Not necessary as the legal basis of the processing is identified in the fulfillment of a legal obligation to which the Data Controller is bound;
5. To ascertain, exercise or defend a right in court or whenever the judicial authorities exercise their jurisdictional functions. Consent Not necessary as the legal basis of the processing is identified in the need to pursue a legitimate interest of the owner thus identified.

The provision of data is optional but, in the event of failure to communicate, it will not be possible to use the requested services.

TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS

Some of the Personal Data of the interested party may be transferred to Recipients located outside the European Economic Area.

The Data Controller undertakes to limit the areas of circulation and processing of personal data (e.g. storage, archiving, data storage on its servers) to countries belonging to the European Union, with an express prohibition on transferring them to non-EU countries that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 - CHAPTER V (adequacy decision, Standard Contractual Clauses or explicit consent by the interested party) or adherence to the EU-US Data Privacy Framework (for transfers to the USA).

AREAS OF COMMUNICATION OF PERSONAL DATA

The personal data acquired through the website in question may be communicated to:

- hosting companies;
- companies or professionals who provide management and technical assistance services for the company's IT infrastructure;
- third parties who manage analytical cookies (based on the cookie policy);
- companies that provide email marketing platforms;

	Documentazione di Sistema - GDPR 2016/679	Modello	INF09
	Web Hotel Revenue S.r.l. Via Caio Mario 7 – 00192 Roma P.IVA 11087061005	Revisione	1 aggiornata al 24-03-2025
Pagina 3 di 4			
PRIVACY POLICY			

- external companies that act as data controllers for the management of reservations;
- to Public Bodies or Offices in accordance with legal and/or contractual obligations

You can request the updated list of external data controllers appointed pursuant to art. 28 of GDPR 2016/679 from the data controller.

DATA STORAGE

The Data Controller will process the data collected through the website for the time strictly necessary to achieve the purposes indicated above. To register for the newsletter, the interested party will have the free right to unsubscribe from it (once voluntarily registered with informed consent) by clicking on the unsubscribe function directly in the email received.

MINORS

The services of this website are not intended for minors. We do not knowingly collect data, including Personal Data, from minors. If we become aware that we have collected Personal Data from a minor, we will immediately delete it, unless there are specific legal obligations that require its retention.

AUTOMATED PROCESSING

Web Hotel Revenue S.r.l. does not carry out processing based on an automated decision-making process, nor does it process your personal data acquired through the company's website for profiling purposes. The site, however, may use profiling cookies and, for the relevant details, please refer to the Cookie Policy.

DATA PROTECTION AND AI

Through the “Revolution Plus” solution developed by Web Hotel Revenue S.r.l., the Data Controller intends to pursue specific objectives represented by production and organizational improvement. This will be made possible by the integration and development of algorithms that process information based on exclusive data, collected in 20 years of successful human experiences in dynamic pricing strategy and not only raw and scrapped data.

Personal data, limited to those necessary for the use of the technologies offered by the Data Controller, are processed with mainly computerized and automated tools in compliance with the principles codified in the GDPR and in the AI Act (Reg.UE 1689/2024). The system developed is among the systems defined as “low risk” by European legislation.

RIGHTS OF INTERESTED PARTIES

The user can freely exercise the rights referred to in Articles 15 et seq. of GDPR 2016/679, namely:

- withdraw consent at any time;
- oppose the processing of their data;
- access your data (obtain information on the data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the same);
- verify and request rectification;
- obtain the limitation of processing;
- obtain the erasure or removal of your personal data (if certain conditions apply);
- receive your data or have it transferred to another controller. The User has the right to receive his/her Data in a structured, commonly used and machine-readable format and, where technically feasible, to obtain its transfer without hindrance to another controller. This provision is applicable when the Data is processed with automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it;

Requests should be addressed to the controller by writing to the email address: privacy@francograsso.com.

RIGHT TO COMPLAIN

	Documentazione di Sistema - GDPR 2016/679 Web Hotel Revenue S.r.l. Via Caio Mario 7 – 00192 Roma P.IVA 11087061005	Modello	INF09
		Revisione	1 aggiornata al 24-03-2025
			Pagina 4 di 4
PRIVACY POLICY			

Interested parties who believe that the processing of their personal data relating to navigation through this website is in violation of the provisions of Regulation 2016/679 have the right to lodge a complaint with the Guarantor, as provided for by art. 77 of the Regulation itself, or to take appropriate legal action (art. 79 of the Regulation).

UPDATE AND REVISION

The privacy policy has been updated to revision 1 on 03-24-2025 and may be subject to future revisions.