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INTRODUCTION

Marriott, The Ritz-Carlton and Bvlgari have a strong commitment to providing excellent service to all of their customers and visitors of their Web sites, including respecting your concerns about privacy. We understand that you may have questions about how we collect and use the information that you provide to us. We have prepared this statement to inform you of the privacy principles that govern the use we make of information we obtain from our customers, including information we obtain through this Website, including other Marriott sites.

This page describes how this site is managed in relation to the processing of the personal data of users who consult it. This information is provided pursuant to art. 13 of Regulation 2016/679 (GDPR) and their equivalents in Switzerland to those who interact with web services accessible via www.bulgarihotels.com. This information is provided only for the site www.bulgarihotels.com and not for other Websites that might be accessed via links. By visiting our website www.bulgarihotels.com you accept the practices described in this Privacy Policy.

DATA JOINT CONTROLLERS AND DATA PROTECTION OFFICER (DPO)

Marriott International Inc., based in 10400 Fernwood Road Bethesda, Maryland 20817, and Ritz-Carlton Hotel Company, LLC, headquartered at 4445 Willard Avenue, Suite 800 Chevy Chase, Maryland 20815 are joint

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controllers for the data processed for the purposes set out in this Privacy Statement, including direct marketing purposes. The appointed representative of the data controller in Italy is Luxury Hotels International Management Italy Srl, registered office in Rome, Via dei Parioli, no. 24.

The Data Protection Officer can be contacted by emailing at privacy@bulgari.com.

PURPOSES, LEGAL BASIS AND RETENTION PERIODS

The personal data provided by users who request information materials or who sign up to receive newsletters are used only to perform the service requested. Such data may be used by the company to conduct its ordinary activities, for the following purposes:

- a) management of user/client relationship;
- b) conducting its ordinary business;
- c) other purposes connected with the activity of the company and associated with that activity such as, but not limited to: improving the products and services offered, although not strictly related to the services requested by the data subject; market research on customer satisfaction, directly or through agencies responsible for marketing, by phone, questionnaires or personal appointments.

When we need to collect personally identifiable information from you to provide you with a particular service, we will ask you to voluntarily supply us with the information we need. For example, if you would like to make a reservation at one of our hotels, we will ask you for information such as name, address, telephone number, email address, credit card number and room preference to process your reservation. We will use your email address to send confirmation and, if necessary, might use the other information to contact you for help in processing the reservation. We will also use your contact information to:

- send you a pre-arrival message summarising your confirmation details and providing other information about the area and the hotel;
- notify you about special offers and promotions as described in this privacy statement; and
- send you occasional customer satisfaction or market research surveys.

You can opt out of marketing communications at any time. You can also opt out of Marriott research surveys. Similar information would be requested to complete a gift certificate purchase.

DIRECT MARKETING

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As noted above, we would like to provide you with information about new products, promotions, special offers and other information that we feel you may be interested in. If you have expressly authorised us to do so, we may submit such information by mail or telephone, unless you have specified otherwise. If you buy a product from us, we may retain your e-mail and mailing address for future communications. If, at any time, you do not wish your data to be used for direct marketing purposes, you can notify us by contacting our customer service via email (privacy@bulgarihotel.com), and we will stop sending any more commercial communications.

BROWSING DATA

The computer systems and software procedures used to operate this website acquire, during normal operations, some personal data whose transmission is implicit in Internet communication protocols. This information is not associated with identified users, however, due to its very nature it may, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users connecting to the site, the URI (Uniform Resource Identifier) of requested resources, time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding the operating system and computer environment. These data are used only to obtain anonymous statistics on site usage and to check its correct functioning, and are deleted immediately after processing. These data could be used to ascertain responsibility in the event of hypothetical "cybercrimes" against the site.

Legal basis of the processing activities above is the legitimate interest of the Data Controller.

COOKIES

Cookies are data created on a server that are stored in text files on the hard disk of your computer, allowing the operation of the Site (such as cookies that recognise the operating system of the PC that connects to the site), the use of a specific feature expressly requested by the user (such as cookies for authentication, storing the "shopping cart" of e-commerce sites, playing media files, etc.) or enhancing the operation of the site, such as cookies that will make browsing faster or showing content of interest to the user based on previous

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choices. Cookies can be permanent (persistent cookies), but may also have a limited duration (session cookies). Bvlgari uses session cookies to allow the safe and efficient exploration of the site, to recognise which country you are connecting from to allow you to register and log in to your account and to enable you to carry out your purchases. These cookies are not stored permanently on your computer, and disappear when the browser is closed. Bvlgari also uses persistent cookies to personalise your experience, depending on the instrument used by the user (computer, tablet, smartphone) and third-party cookies to analyse site visits (Google Analytics) and allow users to share site content through social networks or e-mail (Add This). These cookies are stored permanently on your computer and have a variable duration. You can object to the saving of persistent cookies on your hard disk by configuring browsers (Internet Explorer, Mozilla Firefox, Opera, Safari, etc.) to disable cookies. After doing this, however, some functions of the web pages may not work properly. The user may disable cookies used by Google Analytics by downloading a specific browser plug-in available at the following url: <https://tools.google.com/dlpage/gaoptout>.

Details of the cookies used on this Site can be found at the following url: http://www.bulgarihotels.com/en_US/meta/cookie-policy

DATA PROVIDED VOLUNTARILY

The optional, express and voluntary sending of electronic mail to the addresses indicated on this website entails the subsequent acquisition of the data needed to respond to requests, and of any other personal data included in the message.

DATA PROVISION

In addition to browsing data requirements, the user is free to provide personal data requested in application forms or sections of the site for the sending of information materials or other communications. Their absence can make it impossible for us to fulfil your request. Personal data are processed by automated tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are taken to prevent the loss of data, illicit or incorrect use and unauthorised access.

CATEGORIES OF RECIPIENTS

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The data related to the services provided by this site are handled only by technical personnel within the company who are in charge of processing, or by persons in charge of occasional maintenance operations. No data acquired from the web are ever disclosed.

Data may be communicated to parties acting as independent data controllers such as:

- supervisory and control authorities and entities and, in general, subjects, public or private, entitled to request data;
- lawyers, accountants, auditors.

Data may also be processed on behalf of the Company by external parties appointed as data processors, who are provided with adequate operating instructions, such as companies which provide services for the maintenance of the information system.

The list of recipients is constantly updated and available on request by contacting the address above or sending an e-mail to privacy@bulgari.com

YOUR RIGHTS

The following may be requested at any time: Information regarding the existence of personal data processing and its characteristics, correction and deletion of data or limited processing. It is also possible to object to processing and/or to request that data be sent to another controller (data portability in the case where processing is based on consent or on a contract and carried out with automated tools) or object to be subject to a decision based on automated processing. Data Controllers must respond to requests within deadlines provided for by the Data Protection Legislation; it must also correct incorrect data, ensure that incomplete data is completed, and update data that is no longer correct; and finally when required, it must delete data and limit it and/or stop it from being processed, or ensure that it is, where technically possible, sent to another controller. When exercising rights, as listed above and provided for by Data Protection Legislation, or in order to obtain any related information and/or report potential misunderstandings and issues, the data subject is invited to send an email to privacy@bulgari.com for prompt replies, or to send a written letter to the Data Controller.

If the response is not considered satisfactory, the data subject may contact the competent Supervisory Authority as well as to seek other remedies available under applicable law.

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Any electronic communication sent shall contain an appropriate section outlining how data processing is objected to and how clients no longer receive material and promotional information.