

## COVID-19 Privacy Notice (External) Italy

### **1. INTRODUCTION**

In response to the COVID-19 crisis, Diamond Resorts has taken measures to ensure the safety of our resorts and all of our staff, guests and visitors.

As a part of our newly implemented safety measures, we will be carrying out body temperature checking across many of our resorts.

This external privacy notice ("**COVID-19 Privacy Notice**") describes how we may collect and use Personal Information about you as part of the temperature checking process (although we will keep this as minimal as possible).

This COVID-19 Privacy Notice should be read alongside the Website Privacy Policy located on our website at (which can be accessed at <https://www.diamondresorts.com/Privacy-Policy>).

### **2. WHAT INFORMATION WE COLLECT ABOUT YOU**

#### **A. Personal Information**

We will only collect, store and use the following categories of Personal Information about you if the temperature check indicates that your temperature is beyond the normal threshold:

- Name;
- Booking information where you are a member or guest at our resorts;
- Employer/company name where you are a vendor/supplier; and
- Reference to the fact that the normal temperature threshold has been exceeded and that you have been refused access to the premises.

#### **B. Special Categories of Personal Information**

The temperature check will generate a body temperature reading. This reading will amount to health data, which is considered more sensitive than normal Personal Information and falls within the "special categories" of Personal Information. We will not store your body temperature reading (whether it is beyond the normal threshold or not). However, we may record reference to the fact that the normal temperature threshold has been exceeded.

### **3. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION**

We will only collect Personal Information about you directly as a result of the temperature check and the reading produced from the temperature checking equipment.

If your body temperature reading is beyond the normal threshold we will use your Personal Information to record that you are not able to access the resort on a particular day. We will do this for the purpose of ensuring the safety of the resort.

We will only use your body temperature reading to assess whether your body temperature is beyond the normal threshold and we will not record or store this information. However, we may record to the fact that the normal temperature threshold has been exceeded and that you have been refused access to the premises. Where required, we may use this information to notify relevant health authorities.

### **4. LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION**

We will only use your Personal Information where:

- it is necessary for the performance of our contract with you;
- it is necessary for compliance with our legal obligations; or

- it is necessary for the purposes of our legitimate interests, where such interests are not overridden by your interests or fundamental rights and freedoms (we have a legitimate interest in ensuring the safety of our resorts).

We will only use your temperature reading (and/or a record that the normal temperature threshold has been exceeded) where:

- it is necessary for compliance with our legal obligations; or
- it is necessary for the purposes of our legitimate interests, where such interests are not overridden by your interests or fundamental rights and freedoms (we have a legitimate interest in ensuring the safety of our resorts); and
- processing is necessary for the purposes of carrying out our health and safety obligations under employment law.

## **5. WITH WHOM YOUR PERSONAL INFORMATION MAY BE SHARED AND TRANSFER OF PERSONAL INFORMATION OUT OF THE EUROPEAN ECONOMIC AREA (“EEA”) TO THE UNITED STATES**

If your body temperature reading is beyond the normal threshold your Personal Information (including reference to the fact that the normal temperature threshold has been exceeded and that you have been refused access to the premises) may be shared with Diamond Resorts’ internal teams (for example, for the purpose of managing your booking with us) and relevant health authorities (where required). As this information will be stored on Diamond Resorts’ servers, it is possible that other companies in the Diamond Resorts group (located in the United States) may also have access to this information. We will not store your body temperature reading and so this will not be shared.

Please see the Website Privacy Policy for further details about transfers out of the EEA and the safeguards we have put in place to protect your Personal Information.

## **6. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION**

We will retain your Personal Information (including reference to the fact that the normal temperature threshold has been exceeded and that you have been refused access to the premises) for a period that is reasonably necessary to fulfil the purposes outlined in this COVID-19 Privacy Notice and in accordance with our data retention procedures. We will not store your body temperature reading and so this will not be retained.

Please see the Website Privacy Policy for further details about how long we will keep your Personal Information.

## **7. QUESTIONS AND COMPLAINTS**

If you have any questions, concerns or complaints about this COVID-19 Privacy Notice or our use of your Personal Information, please contact us by:

- writing to our Customer Services Department at Citrus House, Caton Road, Lancaster, LA1 3UA;
- telephoning our Customer Services Department at 0345 3590010; or
- emailing our Customers Services Department at [THEClub@diamondresorts.com](mailto:THEClub@diamondresorts.com).

Information about your data protection rights (including your right to complain to the relevant supervisory authority) can be found in the Website Privacy Policy.