VERTICAL BOOKING SERVICES AND PRODUCTS IN RELATION TO THE GDPR REGULATIONS

IN CHARGE OF PROCESSING					
Legal name	Vertical Booking s.r.l				
Tax code (Partita Iva)	IT02657150161				
Address	**Piazza Pontida, 7**				
City	**Bergamo**	Cap	**24122**	PV	**BG**
Legal Representative	**Alberto Guadalupi**				

RESPONSIBLE FOR DATA HANDLING
Developers, quality controllers, help desk and application consultants.

CONTACT DETAILS			
Data controller	Vertical Booking s.r.l		+39 035232366
Holder Representative	Alberto Guadalupi		+39 035232366

DESCRIPTION

Vertical Booking is an online booking software for hotels and hotel chains.

The complete suite includes a Booking Engine, Synchro Channel Manager, Metasearch Manager, CRO (Central Reservation Office), GDS Connectivity and Representation, Marketing and intelligence tools and Mobile Apps (iOs/Android).

The Vertical Booking platform collects and stores personal data of persons who make a booking on a number of distribution channels with which Vertical Booking is connected.

The distribution channels can be classified as:

- Direct channels, meaning channels without an intermediary
- Indirect channels.

The direct channels include the booking engine module connected to the hotel website or hotel-chain website and the CRO (Central reservation Office) module, Service Provider (SP) module and the DMS module.

The Booking Engine, CRO and DMS modules are configurable in part by the client (hotel) who can choose which booker data they would like to collect and if they would like to collect any data other than the data needed to complete the booking and the data of the guests.

The indirect channels include the IDS (Internet Distribution System), OTA (Online travel agent), TO (Tour Operator), Wholesalers and the GDS.

The Vertical Booking platform has no control over the amount and type of booker data received from indirect channels.

The Vertical Booking platform collects and memorizes credit card information associated to the booking according to the PCI-DSS standard. Follow link for further details:

(https://www.pcisecuritystandards.org/).

In the case of clients requesting a connection to a property management system (PMS), Vertical Booking transfers the relative data to the booker and to the PMS through an interfaced system.

The Vertical Booking platform memorizes the data connected to the profile (name, surname, e-mail address, username and password) with which users connect to the back office of the platform.

AIMS OF USE

Access to the personal data is used to carry out assistance and for the application of maintenance.

INTERESTED PARTIES

Private parties, Businesses, hotel/hotel chain employees, Vertical Booking employees, resellers of Vertical Booking solutions.

TYPE OF PERSONAL DETAILS

The following categories of personal data are identified:

IDENTIFYING DATA

Identifying data about the booker and, in cases, any other guests.

CREDIT CARD

Credit card data associated with the booking and to guarantee the booking.

LOCATION AND MOVEMENT

Internally, each booking when made is associated to the location of the hotel and therefore the location of the subject concerned for the period of the stay at the hotel.

The platform allows the booking of services such as trips and transfers, therefore it can also memorize data about the movement of concerned subjects.

DATA ABOUT THE SERVICES PROVIDED AT THE STRUCTURE/SPA

The platform allows the configuration and booking of additional hotel services or the booking of hotel services independently.

USER PROFILE DATA INSIDE VERTICAL BOOKING

The profile data of users: used by staff of Vertical Booking s.r.l. to access the system.

CLIENT USER PROFILE DATA

The user data of profiles created by clients to independently access and manage their own data on the platform.

INVOICE DATA OF VERTICAL BOOKING S.r.l. CLIENTS

Data of Vertical Booking clients stored for administration purposes.

CATEGORIES OF PARTIES TO WHICH THE DATA COULD BE COMMUNICATED

DATA CENTER EQUINIX in Milan (ML2)

Data center in which the physical servers and necessary equipment resides.

DATA CENTER EQUINIX in Paris for DISASTER RECOVERY (PA2)

Data center that hosts our disaster recovery site

COMMERCIAL PARTNERS

Vertical Booking can communicate client contract data (structure data of hotels etc.) to partners (Expedia, Booking.com) for informative and commercial purposes.

OUTSOURCING SERVICES

Vertical Booking uses incoming and outgoing mail servers (GSuite, Google) for communication related to the verticalbooking.com domain. Emails sent by clients to technical assistance, which could contain identifying data, are saved on our Google server.

Vertical Booking uses an external supplier to manage the two-factor authentication by OTP (one time password): Authy - a Twilio company, 375 Beale St, Suite 300, San Francisco, CA 94105.

Vertical Booking uses an external mailing system for the users who activate the Guest Review module (business name: Stambol).

FOREIGN DATA TRANSFER

DISASTER RECOVERY (FRANCE)

The data is transferred to the disaster recovery site at Equinix PA2 - Data center IBX in Paris to carry out synchronization operations and disaster-recovery backup.

SAFETY CHECK AT APPLICATION LEVEL

Vertical Booking gives its clients (hospitality structures) the possibility of visualizing the list of active users and users which are not active anymore that have access to the platform and they can visualize the personal data of clients and proprietors.

Vertical booking lets its clients manage, or rather insert, remove and modify users. They can also set the permission with which users have access to the system.

TERMS FOR THE DELETION OF DATA

Personal data of bookers has an expiry date of 15 years from its insertion into the system. The client can request that their personal data be forgotten/deleted through a written request to technical assistance, who then proceed to implement the deletion procedure.

Credit card details are automatically deleted from the system 15 days after the checkout of the booking.

SECURITY MEASURES IMPLEMENTED IN THE SOFTWARE

Outlined are the security measures in the application system.

Access profiles

The application guarantees that the client has visibility only of data which they own based on the competency level setting listed below;

The following levels of competency exist:

- Supervisor: administrative access for the purposes of assistance and maintenance to the system. This is only granted to Vertical Booking personnel and is only allowed from certified IP addresses or through VPN
- Area: guarantees access to the management and visualization of the Hotels/Hotel chains which are part of a commercial area.
- Group: guarantees access to the management and visualization of the data of a group of hotels.
- Hotel: guarantees access to one particular accommodation.

Management of username and password

- User name: access to the system occurs through the unique identification of the party who accesses. During the setup phase sign-in data is given which the user will use to access the system. With this sign-in data, the operations carried out are identified by the system and are subsequently tracked and logged in the operation log.
- Password: to access the platform it is necessary to supply a password associated to each username. The complex password must meet the following parameters:
    - Length of 8 characters
    - It must contain at least one capital letter
    - It must contain at least one lower case letter
    - It must contain one number
    - It must contain one special character `[$%*:,£)(@#;+_\-]
    - The password must be different form the 5 previous passwords.

Management of profile access

- The client cannot create users which have competencies higher than their own.

- The client has the possibility of creating other users who have visibility of client and proprietor data according to the level of access chosen by said client. The other users will have a competency level equal to or less than the original user.
- Deactivation/Disabling of sign-in details: the client can disable the users which it has created, reset the expiry date of the password and remove any users it has created.
- Visibility of credit card details: during the creation phase, the user does not have permission to visualize credit card details nor the ability to allow other users to visualize credit card details.
- The client can request that technical assistance allow it the ability to permit the visibility of credit card details for users under its responsibility.

Encryption technology

- Encryption of the password: the password is encrypted with a cryptographically secure hashing algorithm and is memorized with a “salt”. The hash is calculated through a procedure of key stretching to combat brute-force attack.
- Two-factor authentication: to visualize the credit card data the client must first pass a two factor authentication process consisting of supplying a copy of the aforementioned username and password.

The second factor of the authentication consists of one of these two:

- identification through a certified IP address
- OTP (one time password) through registration of the user and a verification carried out by the Authy platform (www.authy.com)

Log tools

The client has the possibility of visualizing the operations that the users under his responsibility have carried out on the platform through a section which offers log extraction tools.

Credit card

The management of every level of access to credit cards is managed according to the PCI-DSS directive.

SECURITY MEASURES IMPLEMENTED FOR ASSISTANCE SERVICES

TELEPHONE ASSISTANCE

This does not present a problem from a personal data point of view. No stored or archived data is transferred and the communication is only verbal.

EMAIL ASSISTANCE

During assistance through email the Vertical Booking technicians always insert in the message text of the disclaimer to inform the Data Controller of the information summary and of the contact details to which they can apply to exercise their rights or the rights of those concerned.

The details relating to credit cards are not transmitted by Vertical Booking staff, neither through email nor over the phone.

In the case of Vertical Booking staff receiving communication (email) containing credit card details or data related to credit card details they must:

1. flag the event to those in charge of carrying out security checks
2. communicate to the client that credit card details must not be sent over non secure channels.

ASSISTANCE THROUGH HTTPS CONNECTION

Technical assistance, to access the supervisor competency on the platform, must be carried out from one of the office IP addresses or through VPN (Virtual Private Network).

ASSISTANCE THROUGH CONNECTION TO SSH WITH VPN

For system maintenance and administration operations, Vertical Booking technicians access the systems through the SSH protocol with a two-factor authentication.

SECURITY MEASURES IMPLEMENTED AT THE DATA CENTER

The software and hardware infrastructure of Vertical Booking resides at the Equinix data center Milan (ML2), address: Via Savona, 125, 20144 Milano MI.

The Disaster Recovery is situated at Equinix PA2, address: 114 Rue Ambroise Croizat Saint Denis, France 93200

Access Control

Access to the Data Center are regulated following the standard procedures of Equinix.

Only authorized Vertical Booking personnel can supply access to the Data Center for maintenance or visitation.

Firewalling

The internal Data center network is separated from public networks. Flow of data from the Data center and the outside are mediated by a firewall system. This firewall system allows the transmission of only explicitly authorized details which are necessary to the function of the system.

DATA CENTER certifications

The following are the certifications for the Equinix ML2 site and for the Equinix PA2 site (available also form the website www.equinix.com)

ML2:

- ISO14001:2004
- ISO 27001
- ISO 50001
- ISO9001:2008
- OHSAS 18001
- PCI DSS

PA2:

- HDA
- ISO14001:2004
- ISO 27001
- ISO 50001
- ISO9001:2015
- OHSAS 18001
- PCI DSS
- SOC 1 Type II
- SOC 2 Type II

Stamp and sign to accept

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