

## CLIENT AND GUEST PRIVACY POLICY

Most recent amendment: May 2018.

This privacy policy applies to the processing of data conducted at the hotels belonging to the UNIVERSAL HOTELS group. Please read it carefully. It contains important information on the processing of your personal data and the rights you have pursuant to the regulations in force in relation to the issue. This policy is published at [www.universalhotels.es](http://www.universalhotels.es) in the "Privacy Universal Hotels" section accessed through a link at the foot of each page of our website, and you may ask our hotel reception staff for a copy to keep.

As a general rule, the fields in our forms marked as mandatory must be completed in order to process your requests.

### 1. Who is in charge of processing your data?

The controllers of the data of the hotel's clients and guests are:

The company operating the hotel at which you stay (hereinafter referred to as the HOTEL, whose identification and contact data is available at the hotel reception), CIA. HOTELERA SANT JORDI, S.A. (hereinafter referred to as UNIVERSAL HOTELS), enrolled with the Corporate Taxpayer Registry under (CIF) nº A07015597, based at Gremi de Cirurgians i Barbers, 25, Bloque B, 3er piso Pol. Son Rossinyol – 07009 Palma de Mallorca, Spain, and UNIVERSAL FLUGREISEN AG, Gewerbeweg 15, FL-9490 Vaduz, Liechtenstein, the last two of which are the management entities of the UNIVERSAL HOTELS brand. The scope of the respective responsibilities of the HOTEL and UNIVERSAL HOTELS is the following:

The HOTEL is responsible for the processing activities arising from the operational management of the hotel, such as the administrative and accounting management of the hotel; the management of bookings, stays and the provision of the services purchased, in addition to dealing with complaints submitted by clients.

UNIVERSAL HOTELS is responsible for the processing activities that involve the brand and the hotel management with regard to the chain, such as, for example:

- The definition and control of the standards implemented by the hotels of the chain and corporate management control;
- The control and improvement of quality as regard the chain as a whole;
- The business exploitation of the data of the group's brands' clients and users, for example, for the delivery of marketing material.

### 2. What personal information do we collect?

The data we process is that obtained from:

- The forms you complete and the requests you submit, such as bookings and requests for services, for example.
- The information provided to purchase our services;
- The information generated by your stay and the provision of the services in question.

All this data is provided, either directly by yourself or by third parties processing requests on your behalf, such as, for example, a travel agency that has booked your stay. The categories of data we process consist typically of:

- Identification, contact, identity card (DNI) and passport and signature data;
- Data of a personal nature, such as gender, date and country of birth, nationality, marital status and language;
- Financial and transaction data;
- Data related to your booking and generated by your stay;
- Data related to clients' preference and profiles and commercial follow-up data;
- The hotels that offer spa treatments or *miniclub* services for children may process health data provided by the clients themselves in order to meet special needs such as, for example, allergies or the taking of medication.

### 3. For what purpose do we process your data?

## CLIENT AND GUEST PRIVACY POLICY

The HOTEL will process your data for the management your bookings and stays, the provision of the services purchased and compliance with legal obligations.

UNIVERSAL HOTELS will process your data for the management of the hotel chain. This includes the analysis of business data and corporate information obtained from consolidated data on clients and guests of the chain's hotels, the control of corporate management, statistical purposes, for improving the quality of the group's services and for delivering marketing material. UNIVERSAL HOTELS may conduct opinion surveys for the purpose of quality control, although answering them is not mandatory.

#### **4. To whom may we disclose your data?**

We will disclose your data in the following situations: When your data needs to be disclosed due to a legal obligation, such as when providing the state security forces with the data in relation to your stay.

When disclosing the data is necessary for the internal management of the corporate group, based on our legitimate interest.

With your prior consent, we will disclose your data to the group's head offices in Switzerland, UNIVERSAL FLUGREISSEN, to be processed to enable us to send you information on our hotel establishments all over the world.

When this is necessary in order to provide the services purchased: For example, in the event your booking includes additional services provided by third-parties, or the request for availability you submit affects this type of services, the personal data required to process such a booking/request for availability will be supplied to the respective providers for this sole purpose.

#### **The legal basis for processing your data**

The basis for the processing of your data by the HOTEL is the execution of the accommodation and services and compliance with legal obligations, particularly those related to the regulations in relation to accounting, taxation, tourism, safety and traveller control.

The hotel management with regard to the chain as a whole is based on the legitimate interest of UNIVERSAL HOTELS in processing consolidated data of clients and guests of the chain's hotels for the purpose of internal administration and management control, as well as to assess and promote the group's services. The delivery of marketing offers and material by UNIVERSAL HOTELS is based on the your consent to receiving such material, without the withdrawal of such consent affecting the provision of the services purchased.

#### **5. How long is your data kept on file for?**

Clients' and guests' data will be kept on file for as long as their relationship with the HOTEL is in force and for the periods of the time pursuant to the applicable legal provisions, and for time required to deal with any liabilities arising from the processing of the data. We will delete this data when it is no longer necessary or pertinent to the purposes for which it was gathered.

Data processed for business purposes will be kept on file until a request is submitted for it to be deleted. The media on which your consent for the processing of your data for these purposes is stored, such as signed forms, electronic form delivery logs, check-in sheets, will be kept throughout the processing process and the applicable prescription periods.

#### **6. What are your rights?**

You have the right to obtain confirmation of whether or not we are processing your personal data and, in this case, to access it. You may also ask for your data to be amended when it is inaccurate or to complete incomplete data, in addition to asking for it to be deleted when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

In certain circumstances, you may ask for the processing of your data to be limited. In this case, we will only process the data involved in the formulation, exercise or defence of complaints or with a view to the protection of the rights of other persons.

In certain circumstances and due to reasons in relation to your specific situation, you may also oppose the processing of your data. In this case, we will stop processing the data, except in the event of

## CLIENT AND GUEST PRIVACY POLICY

imperious legitimate reasons prevailing over your interests or rights and liberties, or for the formulation, exercise or defence of complaints.

Nevertheless, you may revoke the consent you have provided for specific purposes at any time and oppose the processing of your data for the purpose of direct mailing. In this case we will stop processing your personal data for these purposes. The withdrawal of your consent will not affect the legality of the processing based on the consent prior to the same.

Furthermore, and pursuant to certain conditions, you may request the portability of your data to enable you to transfer it to another data controller.

You also have the right to lodge a complaint with any Data Protection Authority or any other pertinent control authority.

In order to exercise your rights you should us a request together with a copy of your national identity document or another valid document identifying you by post or electronic mail, to the addresses specified in the Who is in charge of processing your data? section.

You may send an e-mail to the following electronic mail address to revoke your consent for receiving our marketing material: [privacy@universalhotels.es](mailto:privacy@universalhotels.es)

You will find further information on your rights and how to exercise them on the Spanish Data Protection Agency website at <http://www.agpd.es>.