

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“GDPR”)

VIS HOTELES S.L. PRIVACY POLICY

In conformity with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“GDPR”) and its subsequent regulations, and in conformity with Organic Law 3/2018 of 5 December on the Protection of Personal Data and the guaranteeing of digital rights, VIS HOTELES S.L, as the party responsible for the processing, with address at Av. Antonio Fuertes, 1, 30840, Alhama de Murcia, Murcia. Spain., and with CIF (Tax ID code) B73083446, hereby informs the data owner of the existence of processing of data of a personal nature by the hotel. Below, we provide you with detailed information on the different ways your personal data is processed.

WHAT PERSONAL INFORMATION DO WE PROCESS?

According to the request made by the data owner, we gather personal information which may include: their name, postal address, date of birth, billing address, email address and telephone number; necessary information relating to their booking or stay at the hotel; participation in a loyalty programme; personal characteristics; nationality; payment information such as their payment card number and other information about the card, as well as authentication information and other invoicing details; the guest’s preferences; allergies and illnesses; marketing and communication preferences, as well as the information about the vehicles they may bring to our hotels.

Additionally, in certain cases, we gather other personal information, for example:

- Surveys: we may request demographic information or other personal information in the customer surveys.
- Data collection in the hotel: We collect additional personal information at check-in at our hotels, including information which may be required by certain legislation. We also gather personal information about the hotel services, such as concierge services, spas, activities and entertainment services for children.
- Event profiles: If you organise an event with us, we collect the specifications of the meeting and the event, the date of the event, the number of guests, the room details of the guests, and, for corporate events, the information about your organisation (name, annual budget and number of events sponsored per year). We also gather information on the guests who form part of your group or event.
- Job applications: If you decide to apply to work with VIS HOTELES S.L, you can do so through the Work with Us channel.
- Hotel Wi-Fi service: when you use the Wi-Fi service in our hotels, the personal data you provide for access and authentication may be collected and used by us and by third parties, such as Wi-Fi service providers, to remember your registration information, for technical support purposes, as well as to improve and analyse the service.
- Publicity images: On occasion, the obtainment and publication of photographs of customers or other third parties may take place through the corporate communication channels.

FOR WHAT PURPOSE DO WE PROCESS YOUR DATA?

We use your personal information in a number of ways, including to provide and personalise the services you request in order to offer you the desired level of hospitality at our hotels and to carry out sales and marketing promotions. We collect your consent before processing your data when the applicable legislation so requires.

We are obliged to collect certain data such as your name, address, payment information, etc.. If you do not provide this information, we will not even be able to process the booking.

The purposes for which your personal data is processed are detailed below:

- To guarantee the user access to and use of the various contents located on the website.
- User registrations to provide access to the different services available: to consult all our active employment offers, or to leave us your curriculum vitae for future vacancies, as well for user service.
- To manage the information on your booking prior to your arrival.
- To enable the provision of the services hired.
- Administrative management of the services hired.
- Access to the Wi-Fi network of our hotels.
- Marketing and communication: When it is permitted, we may use your personal information to provide or offer you newsletters, featured promotions and special offers, as well as other marketing messages, in line with the communication preferences you have expressed.
- Security of goods and/or people through the hotel video surveillance system.
- To respond to queries and suggestions for quality control.
- To manage the publication of photographs of employees and/or relatives of employees, as well as of customers or other third parties through the corporate communication channels.
- Moreover, the browsing data and user cookies may be processed for the purposes of improving accessibility for the user, to personalise and analyse their browsing, and to show publicity and advertising based on the user's interests in accordance with our [cookies policy](#), which must be accepted as a step prior to browsing on our website.

WHAT IS THE LEGITIMISATION FOR PROCESSING YOUR DATA?

- To manage the information on your booking prior to your arrival. Contractual or pre-contractual compliance.
- To enable the provision of the services hired. Contractual compliance.
- Administrative management of the services hired. Contractual compliance.
- Where applicable, to enable the sending of information, offers and promotions by VIS HOTELES S.L. Consent / Art. 21.1 LSSI.
In those cases in which a prior contractual relationship exists, commercial communications referring to VIS HOTELES S.L. may be sent, based on legitimate interest in conformity with Art. 21.1 LSSI.
- Security of goods and/or people through the hotel video surveillance system. Legitimate interest.
- Access to the Wi-Fi network. Legitimate interest.
- To make it possible to respond to queries and suggestions for quality control. Legitimate interest.



- To manage the publication of photographs of employees and/or relatives of employees, as well as of customers or other third parties through the corporate communication channels. Consent.

In the cases in which the legitimising basis is consent, the User can withdraw said consent by contacting the hotel by writing to the tax area of the following address: Av. Antonio Fuertes, 1, 30840, Alhama de Murcia (Murcia). Spain, or by email to: protecciondedatos@grupofuertes.com.

VIS HOTELES demands the declaration of legal age for registration as user, which is restricted for minors, to which end you declare and guarantee with your registration that you are of legal age. In any case, VIS HOTELES exonerates itself of processing minors' data without the consent of their parents or guardians.

HOW LONG WILL WE RETAIN YOUR DATA?

The data provided will be retained for the time necessary for each of the purposes for which it is destined. In any case, for the time periods legally established for that in the case of information relating to service provision. For the time period necessary to respond to and carry out the corresponding internal follow-up on the suggestion or observation communicated. Regarding the sending of commercial communications by electronic means, indefinitely, until you instruct us otherwise.

Nevertheless, if you withdraw your consent, this shall not affect the legality of the processing already carried out beforehand.

TO WHICH RECIPIENTS WILL YOUR DATA BE DISCLOSED?

In general, the only foreseen disclosure is that which is legally required, such as disclosure of guest information to law enforcement authorities and other types of disclosure as legally required, such as to the tax authorities.

Additionally, there may be disclosure of information between the establishment and VIS HOTELES S.L. or other entity establishments, as well as disclosure to Fuertes Group, which VIS HOTELES is a part of. This is done in order to simplify the check in process once a guest has stayed at one of our establishments and is based upon the legitimate interest of the different hotels belonging to the entity.

Events or group meetings: If you are visiting VIS HOTELES as part of an event or group meeting, it is possible that the information gathered for planning the event or meeting may be shared with the organisers of said event or meeting and, if necessary, with the guests organising or participating in the event or meeting.

Hotel services: We may share your personal information with third-party service providers in the hotel, such as concierge services, external receptionists, Wi-Fi access providers, spa treatment providers, the swimming pool or restaurants, children's event planners, car hire companies, etc.

Service providers: We trust third parties to provide services and products on our behalf and we may share your personal information with them as appropriate. In general, our service providers are obliged, under their service provision contract, to protect personal information and they may not use it or share it in any way, unless otherwise required to do so by law.

Other recipients: Additionally, VIS HOTELES may disclose personal information for the following purposes: (i) to comply with all current laws; (ii) to respond to questions or requests for information from public authorities; (iii) to comply with a valid legal process; (iv) to protect the rights, privacy, security and property of VIS HOTELES, its guests, visitors, employees and/or the public; (v) to allow us to seek solutions or limit damages that we may incur; (vi) to enforce the terms and conditions of our websites; and (vii) to respond to an emergency.

WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

In relationship with the Hotel's handling of your personal data, you have the right to request the following:

Access. - The data owner shall have the right to obtain confirmation from the data controller about if his/her data is being processed, as well as detailed information about certain aspects of data processing being undertaken.

Correction. - The data owner shall have the right to request the correction of any inaccurate personal data in relationship therewith, and/or to request the completion of any data that is incomplete.

Erasure. - The data owner shall have the right to request the erasure of his/her personal data. In this case, said erasure will be subject to the limits set forth by law.

Limitation of processing. - The data owner shall have the right to request the limitation of his/her personal data's processing.

Opposition to processing. - Under certain circumstances and due to reasons related with their particular situation, data owners may oppose the processing of their data. In this case, the Hotel will stop processing the data, except for legitimate or compelling reasons, or to undertake defence against potential claims.

Right to data portability. - The data owner shall have the right to receive the personal data relevant thereto that was provided to one specific data controller (with said reception of data being in a structured, commonly used, machine readable format) and to send said data to a different data controller.

Right to withdraw consent: The data owner shall have the right to withdraw his/her consent for any processing that we undertake solely on the basis of said consent (such as sending direct marketing materials to his/her personal email account). To withdraw your marketing consent, follow the instructions that are included in all marketing emails or send a written request to the following address: Av. Antonio Fuertes, 1, 30840, Alhama de Murcia (Murcia). You may also send an email to: protecciondedatos@grupofuertes.com.

The aforementioned rights may be exercised by means of a written, signed request to VIS HOTELES S.L., Av. Antonio Fuertes, 1, 30840, Alhama de Murcia, Murcia or by means of the following email address: protecciondedatos@grupofuertes.com.

Likewise, you may get in touch with the Data Protection Officer at the following email address: elena.marin@grupofuertes.com.



ARE INTERNATIONAL DATA TRANSFERS UNDERTAKEN?

We hereby inform you that we may share your personal information with service providers and other third parties that could be in a country different from your own; for example, the Channel Manager that we work with, Siteminder (<https://www.siteminder.com/es/legal/politica-de-privacidad/>). Therefore, your data may be transferred to third countries located outside of the European Economic Area and, more specifically, to the USA. Said transfer will always be in due accordance with the law, as the USA adheres to the Privacy Shield Principles (<https://www.privacyshield.gov/welcome>).

WHAT SECURITY MEASURES DO WE HAVE IN PLACE?

VIS HOTELES S.L has adopted the legally required levels of security in personal data protection, and has installed all the technical means and measures within its reach to prevent the loss, improper use, alteration, unauthorised access or theft of the personal data provided. Having said that, however, the user must be aware that no security measures online are 100% infallible.