

Privacy policy

Updated on 28/05/2019 at 18:08

Version: 1



ACTA HOTELS SL

Basic information on data protection

Data Controller	ACTA HOTELS SL
Purpose	Provision of online management services for users of the website Commercial correspondence related to our services
Legitimation	Express consent and legitimate interest
Recipients	No personal data are assigned to third parties unless there is a legal obligation to do so
Rights	To access, rectify and erase the data, as well as other rights, as stipulated in the additional information
Additional information	Additional and detailed information on data protection can be found in the annex clauses at http://www.actahotels.es/files/politica-privacidad.pdf

At ACTA HOTELS SL we strive to offer you the best possible experience by means of our products and services. In some cases, it is necessary to gather information to achieve the above. We care about your privacy and we believe we should be transparent in this regard.

Therefore, for the purposes of the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27th April 2016 (hereinafter, the "GDPR") on the protection of individuals with regard to the processing of personal data and the free movement of such data and Law 34/2002 of 11th July on Information Society Services and Electronic Commerce (hereinafter, the "LISSEC"), ACTA HOTELS SL hereby informs users that, as the data controller, it will incorporate the personal data provided by them into an automated file.

Our undertaking begins by explaining the following:

- Your data are collected to improve your experience as a user, in accordance with your interests and needs.
- We are transparent about the data about you that we obtain and the reason why we obtain them.
- Our intention is to offer you the best possible experience. Therefore, when we use your personal information we will always do so in compliance with the regulations and, whenever necessary, we will ask for your consent.
- We are aware that the data belong to you. Therefore, if you decide not to grant your authorisation, you may ask us to refrain from processing them.
- Our priority is to ensure your security and to process your data in accordance with the European regulations.

If you wish to obtain further information on the processing of your data, please read the different sections of the privacy policy to be found below:

Who is the controller of my personal data?

Identity: ACTA HOTELS SL

Registered address: C/ Josep Irla i Bosch, 5-7 4ª planta

Tax ID number: B-64650757

Email address lopd@actahotels.com

ACTA HOTELS SL has appointed a Data Protection Officer or internal contact person within its organisation. If you have any queries with regard to the processing of your personal data, you can contact us by writing to lopd@actahotels.com

What personal data do you collect?

Any personal data that the user may provide:

- Name, address and date of birth.
- Telephone number and email address.
- Location.
- Information on payments and returns.
- IP address, the date and the time at which you access our services, the internet browser you use and data on the device's operating system.
- Any other information or data that you decide to share with us.

In some cases, it is obligatory to fill in the registration form to access and enjoy certain services provided on the website. Similarly, failure to provide any personal data that are requested or failure to accept this data protection policy means that it will be impossible to subscribe, register or participate in any of the special offers for which personal data are requested.

Why and for what purpose do you process my data?

At ACTA HOTELS SL we process the information provided by users for the following purposes:

- To manage orders and draw up contracts for our services, either online or at our physical stores.
- To manage the sending of any information you request.
- To conduct sales campaigns and perform the maintenance and management of the relationship with the user, as well as the management of the services provided on the website and any information-related tasks, and to perform automatic assessments, obtaining profiles and carrying out customer segmentation work in order to personalise the processing in accordance with customers' characteristics and needs and improve their online experience.
- To develop and manage competitions, raffles and any other promotional activities that may be organised.
- In certain cases, it will be necessary to provide information to authorities or third-party companies for auditing purposes, as well as to manage any personal data on invoices, contracts and documents in order to respond to claims by customers or the Public Administrations.

We inform you that the personal data obtained as a result of your registration as a user will form part of the Register of Processing Activities, which will be regularly updated in accordance with the provisions of the GDPR.

What are the legal grounds for the processing of my data?

The processing of your data may be based upon the following legal grounds:

- The user's consent to the procurement of services and products, contact forms, requests for information and subscriptions to e-newsletters.
- A legitimate interest in the processing of our customers' data for direct marketing campaigns and the user's express consent to anything related to automatic assessments and the creation of profiles.
- Compliance with legal obligations for the prevention of fraud, correspondence with the public authorities and

third-party claims.

How long do you retain my data for?

The processing of your data for the purposes outlined above will continue for the time necessary to fulfil the purpose of their collection (e.g. throughout the commercial relationship), as well as for the fulfilment of any legal obligations arising from the processing of the data.

Who will my data be assigned to?

In certain cases, and only when necessary, ACTA HOTELS SL will provide users' data to third parties. However, the data will never be sold to third parties. Any external service providers (e.g. payment providers or delivery companies) that ACTA HOTELS SL works with may use the data to provide the corresponding services. However, they will not use said information for their own purposes or assign them to third parties.

ACTA HOTELS SL endeavours to guarantee the security of the personal data when they are sent outside the company and ensures that third-party service providers respect users' confidentiality and implement the appropriate measures to protect the personal data. Said third parties are obliged to ensure that the information is processed in accordance with the regulations on data privacy.

In certain cases, the law may require personal data to be disclosed to public bodies or other parties, but only to the extent strictly necessary to comply with said legal obligations.

The personal data obtained may also be shared with other companies within the group.

Where are my data stored?

Generally speaking, your data are stored within the EU. We will ensure that any data that are sent to third parties from outside the EU enjoy a sufficient level of protection, either because they apply BRCs (Binding Corporate Rules) or because they have adhered to the Privacy Shield.

What rights do I have and how can I exercise them?

You may send your messages and exercise your rights by writing to the following address: lopd@actahotels.com.

Under the provisions of the GDPR you may request the following:

- The right of access: you may ask for information on the personal data about you that we have in our possession.
- The right to rectification: you may inform us of any change in your personal data.
- The right to erasure and to be forgotten: you may request the erasure of your personal data after previously blocking them.
- The right to limitation of the processing: this entails a restriction on the processing of your personal data.
- The right to oppose: you may withdraw your consent to the processing of your data by opposing any further processing thereof.
- The right to portability: in certain cases, you may ask for a copy of your personal data in a structured, commonly used and machine-readable format for it to be transmitted to another data controller.
- The right not to be subject to individualised decisions: you may request that decisions should not be made solely upon the basis of automated processing, including the creation of profiles, which produces legal effects or significantly affects the individual in question.

In certain cases, a request may be refused if you ask for data necessary for compliance with legal obligations to be deleted.

Similarly, if you have any complaints about the processing of your data, you can submit a claim to the

data protection authority.

Who is responsible for the accuracy and truthfulness of the data provided?

The user is solely responsible for the truthfulness and correctness of the data provided, exempting ACTA HOTELS SL of any liability in this regard. In any event, users will guarantee and be responsible for the accuracy, validity and authenticity of the personal data they provide and undertake to keep them duly updated. Users agree to provide complete and correct information on the registration and subscription forms. ACTA HOTELS SL reserves the right to terminate any services procured by users in the event that the data provided are false, incomplete, inaccurate or out of date.

ACTA HOTELS SL cannot be held liable for the accuracy of the information it has not created and for which another source is indicated and, therefore, nor can it accept any liability for any hypothetical damages that may result from the use of said information.

ACTA HOTELS SL reserves the right to update, modify or delete the information contained on its website and may even restrict or deny access to such information. ACTA HOTELS SL cannot be held liable for any damages that the user may suffer as a result of errors, defects or omissions in the information provided by ACTA HOTELS SL, provided that it comes from sources other than the company itself.

Similarly, the user certifies that he/she is over 14 years of age and that he/she has the legal capacity to grant his/her consent to the processing of the personal data.

How do you process the personal data of minors?

In principle our services are not specifically intended for minors. However, in the event that any of them are addressed to people under fourteen years of age, in accordance with article 8 of the Spanish GDPR and article 7 of Organic Law 3/2018 of 5th December (LOPDGD) [Organic Law of Protection of Personal Data and guarantee of Digital Rights], ACTA HOTELS SL will require the valid, free, unequivocal, specific and informed consent of the minor's legal guardians to process his/her personal data. In the above case, the ID card or another form of identification of the person granting the consent will be required.

In the case of people over fourteen years of age, the data may be processed with the user's consent, except in cases in which the law requires the attendance of the holders of the parental authority or guardianship.

What security measures do you apply to protect my personal data?

ACTA HOTELS SL has adopted the legally required security levels for the protection of personal data and endeavours to install any other additional means and technical measures available to it so as to prevent any loss, misuse, alteration or unauthorised access or the theft of the personal data supplied to ACTA HOTELS SL.

ACTA HOTELS SL cannot be held liable for any hypothetical damages resulting from interferences, omissions, interruptions, computer viruses, telephone breakdowns or disconnections in the functioning of this electronic system for reasons beyond its control, for delays or blockages in the use of this electronic system caused by deficiencies or the overloading of telephone lines or the overloading of the Data Processing Centre, the Internet system or any other electronic systems or any damages that may be caused by third parties by means of unlawful interference beyond the control of ACTA HOTELS SL. However, the user should be aware that security measures on the Internet are not impregnable.

Links to other websites

The <https://www.actahotels.es/> website may contain links to other websites. When you click on one of these links and access an external website, your visit will be subject to the privacy policy of said website and ACTA HOTELS SL will be exempt from any kind of liability with regard to its privacy policy.

How do you use cookies?

The website and social media of ACTA HOTELS SL use cookies in order to optimise and personalise your browsing experience. Cookies are physical information files that are stored on the user's computer. The information gathered by means of the cookies serves to facilitate the user's browsing on the website and to optimise the browsing experience. The data collected by means of the cookies may be shared with their creators, but on no account will the information obtained by them be associated with personal data or data that may identify the user.

However, if the user doesn't want cookies to be installed on his/her hard drive, he/she has the option of configuring the browser in such a way that it prevents the installation of these files. For further information, view our Cookies Policy at <https://www.actahotels.es/files/politica-cookies-EN.pdf>

Can the privacy policy be modified?

This privacy policy is subject to modifications. We advise you to review the privacy policy on a regular basis.