

PRIVACY POLICY

Basic Information on Data Protection	
Controller	ACTA HOTELS SL
Purposes of treatment	Informative website. Management of queries through forms. Management of service promotions.
Lawfulness of treatment	Express consent of the data subject. Legitimate interest for data processing.
Recipients	No data will be transferred to third parties, unless legally required.
Rights of data subjects	Access, rectify and erasure the data, as well as other rights, as explained in the additional information.
Additional information	You can address your communications and exercise your rights by sending a request to the following e-mail address: lopd@actahotels.com .

ADDITIONAL INFORMATION ON DATA PROTECTION

In ACTA HOTELS SL we work to offer you through our products and services the best possible experience.

In some cases, it is necessary to collect information to achieve this. We care about your privacy and we believe that we must be transparent about it.

Therefore, and for the purposes of the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 (hereinafter "GDPR") on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and the LAW 34/2002, of July 11, of Services of the Information Society and Electronic Commerce (hereinafter, "LSSI"), ACTA HOTELS SL informs the user that, as responsible for the treatment, it will incorporate the personal data provided by users in an automated file.

Our commitment begins by explaining the following:

- We collect your data to improve the user experience, serving your interests and needs.
- We are transparent about what data we collect about you and why we collect it.
- Our intention is to provide you with the best possible experience. Therefore, when we use your personal information, we will always do so in a compliant manner, and when necessary, we will ask for your consent.
- We understand that your information belongs to you. Therefore, if you decide not to authorize us to process it, you can ask us to stop processing it.
- Our priority is to ensure your security and to process your data in accordance with European regulations.

If you would like more information about how your data is handled, please see the different sections of the privacy policy below:

Who is responsible for the processing of your data?

The present document constitutes the DATA PROTECTION POLICY that applies to all the personal data that ACTA HOTELS SL treats about you. Next we inform you about the identification data of the PERSON RESPONSIBLE for the treatment:

Controller: ACTA HOTELS SL

CIF: B-64650757

Mailing Address: C/ Josep Irla i Bosch, 5-7 4ª planta-- 08034-- BARCELONA (Spain)

Contact telephone number: 934.540.642

E-mail address: lopd@actahotels.com.

ACTA HOTELS SL has appointed a Data Protection Officer or an internal contact person within its organization. If you wish to make a query in relation to the processing of your personal data, you can contact him by email lopd@msanchez.cat.

What personal data do we collect?

The personal data that the user may provide:

- Name, address and born date.
- Telephone number and email address.
- Location.
- Payments and deliveries information.
- IP address, date and time in which you access to our services, browser and data about the operating system of your device.
- Any other information or data that you decide to share with us.

Most of the personal information we process is provided to us directly by you. In some cases, it is obligatory to fill in a form to access certain services. Not providing the personal data requested or not accepting this data protection policy means the impossibility of navigating the website.

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

In ACTA HOTELS SL we treat the information provided by the interested persons with the following purposes:

- Manage orders or hire any of our services, either online or in physical stores.
- Manage the sending of the information requested.
- Develop commercial actions and perform the maintenance and management of the relationship with the user, as well as the management of the services offered through the Web site and the work of information, being able to perform automatic assessments, profiling and segmentation of customers in order to customize the treatment according to their characteristics and needs and improve the customer's online experience.
- In some cases it will be necessary to provide information to the Authorities or third party companies for auditing purposes, as well as to handle personal data from invoices, contracts and documents to respond to claims from customers or Public Administrations.

We inform that the personal data obtained as a result of your registration as a user will be part of the Register of Activities and Processing Operations (RAT), which will be updated periodically in accordance with the provisions of the RGPD.

What is the lawful basis for the processing of your data?

The processing of your data can be based on the following legal bases:

- Consent of the interested party for the contracting of services and products, for contact forms, requests for information or registration in e-newsletters.
- Legitimate interest for the processing of our customers' data in direct marketing actions and express consent of the interested party for everything related to automatic evaluations and profiling.
- Fulfillment of legal obligations for fraud prevention, communication with public authorities and third party claims.

How long do we keep your data?

The processing of data for the purposes described above will be maintained for the time necessary to fulfill the purpose of collection (for example, for the duration of the business relationship), as well as for the fulfillment of legal obligations arising from the processing of the data.

To which recipients is your data communicated?

In some cases, only when necessary, ACTA HOTELS SL will provide user data to third parties. However, the data will never be sold to third parties. External service providers (e.g. payment providers or delivery companies) with which ACTA HOTELS SL works may use the data to provide the corresponding services, however, they will not use such information for their own purposes or for transfer to third parties.

ACTA HOTELS SL tries to guarantee the security of personal data when they are sent outside the company and ensures that third party service providers respect confidentiality and have adequate measures to protect personal data. These third parties are obliged to ensure that the information is treated in accordance with data privacy regulations.

In some cases, personal data may be required by law to be disclosed to public bodies or other parties, only what is strictly necessary for the fulfillment of such legal obligations will be disclosed. Personal data obtained may also be shared with other group companies.

Where is your data stored?

In general, data is stored within the EU. For data that is sent to third parties outside the EU, we will ensure that they offer a sufficient level of protection, either because they have Binding Corporate Rules (BCR).

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

You can address your communications and exercise your rights by sending a request to the following e-mail address: lopd@actahotels.com.

Under the provisions of the RGPD you can request:

- **Right of access:** you can request information about the personal data we have about you.
- **Right of rectification:** you can communicate any change in your personal data.
- **Right of deletion and oblivion:** you can request the deletion after blocking personal data.
- **Right to limit processing:** this means restricting the processing of personal data.

- **Right of opposition:** you can withdraw your consent to the processing of data, opposing further processing.
- **Right to portability:** in some cases, you may request a copy of the personal data in a structured, commonly used and machine-readable format for transmission to another controller.
- **Right not to be subject to individualized decisions:** you may request not to be subject to decisions based solely on automated processing, including profiling, that produces legal effects or significantly affects the data subject.

In some cases, your request may be refused if you request deletion of data necessary to comply with legal obligations.

Also, if you have a complaint about the processing of your data, you can file a complaint with the data protection authority.

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

The user is the only responsible for the truthfulness and correctness of the data included, exonerating ACTA HOTELS SL from any responsibility in this respect. The users guarantee and are responsible, in any case, for the accuracy, validity and authenticity of the personal data provided, and undertake to keep them duly updated. The user accepts to provide complete and correct information in the registration or subscription form. ACTA HOTELS SL reserves the right to terminate the contracted services that had been concluded with the users, in case the data provided are false, incomplete, inaccurate or not updated.

ACTA HOTELS SL is not responsible for the veracity of the information that is not of its own elaboration and of which another source is indicated, so it does not assume any responsibility regarding hypothetical damages that could be caused by the use of such information.

ACTA HOTELS SL reserves the right to update, modify or delete the information contained in its Web pages being able even to limit or not to allow the access to the above mentioned information. ACTA HOTELS SL is exonerated from any responsibility for any damage that the user may suffer as a consequence of errors, defects or omissions in the information provided by ACTA HOTELS SL whenever it comes from external sources.

Likewise, the user certifies that he/she is older than 14 years old and that he/she has the necessary legal capacity to give consent for the treatment of his/her personal data.

How do we handle personal data of minors?

In principle, our services are not specifically directed to minors. However, in the event that any of them are directed to minors under fourteen years of age, in accordance with Article 8 of the RGPD and Article 7 of the LO3/2018, of December 5 (LOPDGDD), ACTA HOTELS SL will require the valid, free, unequivocal, specific and informed consent of their legal guardians to process the personal data of minors. In this case, the

ID card or other form of identification of the person giving consent will be required.

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

What security measures do we apply to protect your personal data?

ACTA HOTELS SL has adopted the legally required levels of security for the protection of Personal Data, and tries to install those other additional technical means and measures within

its reach to avoid the loss, misuse, alteration, unauthorized access and theft of the Personal Data provided to ACTA HOTELS SL.

ACTA HOTELS SL is not responsible for hypothetical damages that could be derived from interferences, omissions, interruptions, computer viruses, telephone breakdowns or disconnections in the operative functioning of this electronic system, caused by reasons beyond the control of ACTA HOTELS SL; delays or blockages in the use of this electronic system caused by deficiencies or overloads of telephone lines or overloads in the Data Processing Center, in the Internet system or in other electronic systems, as well as damages that may be caused by third parties by means of illegitimate intrusions beyond the control of ACTA HOTELS SL. Nevertheless, the user must be aware that Internet security measures are not impregnable.

Links to other Web sites

In the Web site of ACTA HOTELS SL there may be links to other Web pages. When clicking on one of these links and accessing an external Web site, the visit shall be subject to the privacy policy of such Web site, and ACTA HOTELS SL shall not be held responsible for its privacy policy.

How do we use cookies?

The website and social networks of ACTA HOTELS SL use cookies, in order to optimize and customize your navigation through it. Cookies are physical information files that are hosted on the user's own terminal, the information collected through cookies is used to facilitate user navigation through the portal and optimize the browsing experience. The data collected through cookies may be shared with the creators of the same, but in no case the information obtained by them will be associated with personal data or data that can identify the user.

However, if the user does not want cookies to be installed on your hard drive, you can configure your browser to prevent the installation of these files. For more information, please see our [Cookies Policy](#).

Can the privacy policy be changed?

This privacy policy is subject to change. We recommend that you review the privacy policy from time to time.