

PRIVACY POLICY

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In accordance with applicable data protection regulations, this Privacy Policy is intended to help you understand what data is collected by HOTELOPIA, S.L.U (hereinafter, “**HOTELOPIA**”) and how it is processed.

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1. DATA CONTROLLER

The Data Controller for the processing of the personal data you have provided us is HOTELOPIA, with registered office at Camí Son Fangos, 100, Palma de Mallorca, Spain.

HOTELOPIA will process the personal data collected on this website, as well as via HOTELOPIA profiles on social network, such as Twitter and Instagram. This Privacy Policy applies to any personal data collected via these methods.

2. DATA PROTECTION OFFICER

HOTELOPIA belongs to a group of companies, referred altogether as HBX Group (hereinafter, “**HBX**”). HBX, and therefore, HOTELOPIA has a Global Data Protection Officer to respond to any queries, requests or clarifications regarding the processing of personal data that may be made by HOTELOPIA in the following email address dataprotection@hotelbeds.com or at our postal address, mentioned in the paragraph above.

3. HOW DID WE OBTAIN YOUR DATA?

The personal data processed shall be those that you provide to us through the different forms that HOTELOPIA makes available to you on the Website, as well as when you interact or contact us directly or indirectly either through our Website, our addresses (emails or postal) or HOTELOPIA or HBX profiles on social network.

Also, when you visit HOTELOPIA sites various technologies are used to collect and store information and this includes the use of cookies or similar technologies to identify your browser or device. HOTELOPIA also uses these technologies to collect and store information when you interact with services offered by HOTELOPIA or other features. You can obtain more information about how HOTELOPIA process personal data obtained through cookies or as a result of your

browsing in the event that you accept the installation of cookies (for more information about cookies on the Website, visit our [Cookies Policy](#) where you can also find details on how to allow or disable cookies).

4. WHAT PERSONAL DATA DO WE PROCESS, FOR WHAT PURPOSE AND FOR WHAT REASON

These purposes are listed below depending on which category of data subject you are, indicating which data shall be processed (type of data) and for what reason or on what basis (legal basis). Likewise, we also process any additional data that you provide us with or that is generated in the course of your relationship with HOTELOPIA for the purposes set out below.

MANAGE CUSTOMER AND POTENTIAL CUSTOMER BOOKINGS, PAYMENTS AND REQUESTS	
TYPE OF DATA	PURPOSE AND LEGAL BASIS
▪ Identification data: name, surname, passport number. ▪ Contact data: e-mail, telephone number. ▪ Financial data: credit card numbers. ▪ Any additional information or request provided from you. ▪ Browsing details. ▪ Preferences and requirements regarding your bookings. ▪ Browsing preferences and interests.	a) Performance of a contract between you and HOTELOPIA or application of pre-contractual measures: • Manage the contractual relationship with you and ensure the provision of the contracted products and services, which includes both the management of services offered by HOTELOPIA, as well as the service quality, billing, collection and withdrawal of the same. This includes the processing of your bookings and the payments for our products and services through HOTELOPIA, call centres or mobile communications systems based on GSM, GPRS or UMTs technology. • Inform you about every confirmation and/ or modification of your bookings made through HOTELOPIA or call centres, as well as to send you any other notification that you may have requested regarding products and services booked by you, whether by electronic or other means. • Manage the commercial relationship with potential clients, attending to requests for information on products and services offered by HOTELOPIA. b) Legitimate interests of HOTELOPIA: • Carry out commercial communications regarding HOTELOPIA's goods and services that are similar to those that have been the object of the goods and services provided to you. For example, communications regarding destinations, travel tips, hotels managed by HOTELOPIA. These communications will be send based on your interests and in line with your profile, as we inform you in the processing section titled "Automated Decisions and Profiling". In this case, the legitimate interest of HOTELOPIA would be to carry out direct marketing activities aimed at its customers allowed by the data protection and electronic communications legislations. That is that we can send commercial communications when you become a customer, in the context of the sale of a product or a service if they are similar to the products or services that you have purchased.

	You can object to receive this type of communications, now or anytime, sending an email to the address identified in section 2. Likewise, you will have the chance to object in every commercial communication send by HOTELOPIA by clicking the unsubscribe section included in the footer of each communication. HOTELOPIA outsources email marketing services in order to compile information on campaigns, i.e., to track the opening of emails and clicks on content and links included in the emails. This information is compiled to prepare statistical reports on recipient behaviour so we can optimise our campaigns. • Preparation of a commercial profile based on your tastes and interests, starting from an analysis of the products or services you have purchased or shown an interest in and queries made in order to better match our promotional actions, such as the sending of marketing messages. This profile will be prepared from internal sources in accordance with information on your browsing, the information obtained referring to your requirements or preferences you stated during your relationship with HOTELOPIA, the activities you effectively engage in and your different information touchpoints with our organisation. For example, the type of hotel booked, country of destination or vacation duration, among other aspects. • Conduct surveys and market studies to know the quality of our products or services and the preference of our clients. The legitimate interest of HOTELOPIA is to improve the commercial offer and experience to its clients. • Manage and process any legal claims, out-of-court claims and insurance claims received by HOTELOPIA in relation to you if we carry out a personal data processing that it is not foreseen by the applicable legislation regarding. c) Consent given by you: • Carry out commercial communications with you by any means, including electronic means, based on your Internet browsing and/or consumption habits. Such communications may relate to advertising or promotional material about products and services deemed to be of interest to you based on the aforementioned criteria.
GENERAL CONTACT	
TYPE OF DATA	PURPOSE AND LEGAL BASIS
Personal data that you provide to us in your contact by email.	Legitimate interest on answering your question and/or claim. To deal with requests, queries or complaints through the sections and contact forms on the Website or through other channels such as email for general information about the Website or call centres.
WEBSITE USERS	

TYPE OF DATA	PURPOSE AND LEGAL BASIS
- Navigation data - Technical data - IP address	The processing of your personal data is legitimized by the <u>express consent</u> you give us through the cookie banner made available by HOTELOPIA. You may withdraw your consent at any time in accordance with the information provided in our Cookies Policy. However, HOTELOPIA processes information obtained through cookies or similar technologies without your consent when it is necessary to provide you with the website services. Anonymized or aggregated information that does not contain any attribute that can identify you directly or indirectly is also processed. The purpose is: To personalize and segment the content of the Website through the use of cookies or similar technologies when these are consented to by the user through the corresponding banner.
SOCIAL MEDIA USERS	
TYPE OF DATA	PURPOSE AND LEGAL BASIS
Those personal data that the privacy policy of the social network in which you have an account / user profile, as well as the privacy settings you have as a user of that social network allow us to process. This data depends on your own privacy settings in your account on the social network and the privacy policy of that social network.	HOTELOPIA has active profiles in different social networks, the following personal data processing are applicable to persons who become HOTELOPIA stakeholders by being a member, following or being part of such profiles. The legal basis for the processing of your personal data is the performance of the terms and conditions arose from your status as a registered user of the social network: Interaction of your profile with the corresponding social network with HOTELOPIA, including responding to queries, comments posted on public profiles.
APPLICABLE TO ALL DATA SUBJECTS	
TYPE OF DATA	PURPOSE AND LEGAL BASIS
Those personal data that you provide us and that are generated in the relationship.	Fulfilment of our civil, commercial, tax, accounting and legal obligations related to compliance with personal data protection regulations, among others that may be applicable.

When legitimate interest is the legal basis for the processing, we ensure that your interests, fundamental rights and freedoms do not override our legitimate interests which are assessed through a balancing test we carry out. You can obtain information about the balancing test by contacting HOTELOPIA's DPO, through the addresses indicated in the "Data Protection Officer" or "How can you exercise your rights" section of this Privacy Policy.

If you fail to provide certain information that is a statutory or a contractual requirement or a requirement to enter into a contract, we may not be able to provide the service or information requested by you or enter into a contract with you, as applicable. We will inform you whenever

you are obliged to provide the information and of the possible consequences of failure to provide such information.

5. WHEN AND WHY DO WE DISCLOSE YOUR PERSONAL DATA TO THIRD PARTIES?

Personal data may be shared with to the following recipients, for the reasons explained below:

RECIPIENT	PURPOSE	LEGAL BASIS
Public administrations; Courts and tribunals; Law enforcement agencies	For the fulfilment of the legal obligations to which HOTELOPIA is subject for the development of its activity, and in the cases provided by law, including the obtaining of subsidies and public aid.	Fulfil a <u>legal obligation</u> .
Accounting audit firms	To comply with the legal obligations of account auditing to which HOTELOPIA is subject due to its activity.	Fulfil a <u>legal obligation</u> .
Companies that are part of HBX Group	We may communicate the data to the other Group companies with the purpose of being able to offer the best service for you taking into consideration your allergies and/or special needs and other administrative purposes. These personal data are considered sensitive and are subject to special protection in accordance with applicable regulations.	The <u>legitimate interest</u> of HOTELOPIA recognized by the applicable regulations on data protection.
Third parties interested in acquiring all or part of the capital stock of HOTELOPIA.	Analysis and execution of commercial operations in which HOTELOPIA may be involved due to structural modifications or transfer of business.	The <u>legitimate interest</u> of HOTELOPIA to analyse and execute commercial operations in the course of structural modifications or transfers of business.

In addition, HOTELOPIA has signed confidentiality and processing of personal data agreements necessary and required by law with suppliers who need access to your data for the provision of services in order to process the data on our behalf and only under our instructions. Suppliers with whom HOTELOPIA has signed the aforementioned agreements are those such as call centre provider, customer relationship management systems providers, marketing service providers, suppliers of internal accounting information management software as well as banks and other financial institutions.

From HOTELOPIA we shall not share your data with other third parties without first obtaining your consent, except in those cases where it is necessary for compliance with legal or contractual obligations to which HOTELOPIA is subject at all times by its nature and activity.

If in the future HOTELOPIA shall make other disclosure of personal data, it shall inform you in a timely manner.

6. INTERNATIONAL DATA TRANSFERS

HOTELOPIA hires the services of suppliers located in countries outside the European Economic Area, the UK and/or Switzerland based on decisions of adequacy of the European Commission, the UK's Secretary of State or the Swiss Federal Council (as applicable). In this case, it is considered that the countries have equivalent regulations to the European, the UK or the Swiss one. In the event that HOTELOPIA needs to hire services from suppliers located in countries that do not have regulations equivalent to the European, the UK or the Swiss (as applicable), the contracting shall include all the guarantees and safeguards required by the regulations to preserve your privacy, after verification of the legislation of the destination country. In certain specific cases, we transfer your data outside the European Economic Area, the UK and/or Switzerland because it is in your interest or is necessary to conclude or perform the contract we have with you. For instance, when you make a reservation on HOTELOPIA, we might need to transfer your data to a hotel or business partner who is located in the country of your choice.

Such safeguards may consist of the application of contractual clauses and additional guarantees to them, in accordance with the regulations of each destination country, or of binding corporate rules approved by the data protection authorities. For citizens in the European Economic area this contractual clauses are available [here](#). We also inform you that the regulations allow us to send your data to such countries, if it is necessary to comply with our obligations arising from the service you request from us.

Likewise, we inform you that HBX, group to which HOTELOPIA belongs, has companies outside the European Union, the UK or Switzerland. A list with these countries can be found [here](#). In those cases, HOTELOPIA requires that these companies comply with the appropriate measures to protect your personal data following the European regulations.

For more information about the guarantees to your privacy, or the destination countries to which we need to transfer your data to fulfil our contractual obligations to you, you can contact HOTELOPIA, through the addresses indicated in the "How can you exercise your rights" section of this Privacy Policy.

7. AUTOMATED DECISIONS AND PROFILING

HOTELOPIA adopts automated decisions regarding your profiling when we make certain uses of your personal data which affects you legally or in a similar fashion.

Automated decisions mean that a decision concerning you is taken automatically based on a computer decision (leveraging software algorithms) without human review on our part. For example, we tap automated decisions to customise the sending of marketing communications in line with the responses you supply or your behaviour with HOTELOPIA.

The creation of profiles are based on analysing your interests and are carried out through a general segmentation, not specific or exhaustive, for example, according to your destination, language, interests linked to your interactions with HOTELOPIA content, services and products, that is, identifying small aspects of you as a data subject with information obtained directly from you. This creation of profiles will only influence the type of commercial communications you will receive from HOTELOPIA.

You may exercise this right by contacting us via the contact details indicated in the “How can you exercise your Rights” section.

8. FOR HOW LONG DO WE KEEP YOUR DATA?

We shall only keep your personal data for as long as we need it for the purposes for which we collect it and to comply with the statutory limitation and retention periods for reasons strictly limited and authorized by law or until your consent withdrawal. We retain your personal data a maximum of 10 years which is the statutory period for the prescription of criminal offenses regarding the noncompliance of tax obligations, notwithstanding, in certain circumstances, not linked to our contractual relationship, we apply shorter retention periods. In some circumstances, we anonymize personal data so that it is no longer identifiable, and we can continue to use it. When we no longer need the personal data, we securely delete or destroy it.

HOTELOPIA retains the data collected to carry out the above purposes for the duration of your relationship with HOTELOPIA and, even thereafter, until the statute of limitations on any legal liability arising there. For more information on specific retention periods, you can contact HOTELOPIA through the addresses indicated in the “How can you exercise your rights” section of this Privacy Policy.

9. HOW CAN YOU EXERCISE YOUR RIGHTS?

You may exercise, with respect to the data collected, the rights of access, rectification, **object**, deletion, limitation and portability of data, in accordance with the regulations on data protection and withdraw your consent, as well as the right to define directives regarding the fate of your data after your death. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

These rights may be exercised by sending a communication:

- To the email dataprotection@hotelbeds.com; or
- By any postal means with which there is evidence of receipt by HOTELOPIA, addressed to the following address: to Camí Son Fangos, 100, Palma de Mallorca, Spain.

Although the applicable regulation does not introduce any formal requirements for you to exercise your rights. We recommend including "Data protection" as a subject to the email or the envelope.

Also, if you consider that the processing of your personal data violates the regulations or your privacy rights, you can file a complaint:

- via the postal and e-mail addresses indicated above,
- before the Spanish Data Protection Authority Data Protection Authority, by accessing www.aepd.es or at the address Calle Jorge Juan, 6, 28001, Madrid, Spain, which is the competent authority for HOTELOPIA, or
- with a data protection authority, for example at the data protection competent for your habitual residence, place of work or place of the alleged infringement. The contact details of the data protection authorities can be found here.

10. CHANGES, MODIFICATIONS OR UPDATES

HOTELOPIA reserves the right to revise this Privacy Policy at any time it deems appropriate, in order to reflect regulatory changes, best practices or update the processing activities of personal data and you can see when this Privacy Policy was last updated at the top of the page. You shall be informed of such updates in accordance with regulatory requirements, in the event that your rights are significantly affected as a result of such modification or update.