

Last modified: April 2025

This privacy policy applies to the processing of data carried out at UNIVERSAL HOTELS.

Please read it carefully, as you will find important information about how your personal data is processed and the rights granted to you by current regulations on data protection. This policy is published at <https://www.universalbeachhotels.com/> in the “Corporate - Privacy” section, accessible via a link at the footer of each page of our website. It can also be consulted at the hotel reception, where you can request a copy to keep.

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

## **1. Who is responsible for processing your data?**

The data controllers for the hotel’s clients and guests are:

The company operating the hotel where you are staying (hereinafter the HOTEL, whose identification and contact details are available at the hotel Reception), CIA. HOTELERA SANT JORDI, S.A. (hereinafter CIA HOTELERA) with Tax ID A07015597, located at Gremi de Cirurgians i Barbers, 25, Block B, 3rd floor, Pol. Son Rossinyol – 07009 Palma de Mallorca, Spain, and UNIVERSAL FLUGREISEN AG, Gewerbeweg 15, FL-9490 Vaduz, Liechtenstein. The latter two entities are the managers of the UNIVERSAL HOTELS brand.

The respective responsibilities of the HOTEL and the UNIVERSAL HOTELS management companies are described in this policy.

For any questions or issues related to the processing of your personal data, you can contact the Data Protection Officer of UNIVERSAL HOTELS at [privacy@universalhotels.es](mailto:privacy@universalhotels.es).

## **2. What are the purposes for which we will process your data and on what legal basis?**

### **a) Management of reservations and provision of contracted services.**

The HOTEL will process the data provided in reservation requests or service requests to manage those reservations and deliver the requested services. The categories of data that the HOTEL will process for these purposes are as follows:

- Identifying and contact details of the reservation holder or the person requesting or contracting the service;
- Data related to the reservation or service request itself (dates of stay, number and age of guests, and requested services);
- Payment method data;
- Data related to transactions of goods and services.

These data are obtained either directly from you, from CIA HOTELERA reservation center, or from third parties that have processed the reservation or requested the service on your behalf, such as the travel agency through which you made your reservation.

Processing of these data is necessary for the execution of the accommodation contract, the provision of the requested services, or to carry out pre-contractual measures at your request.

The data collected at the time of your registration at the HOTEL, along with those generated during your stay, will be consolidated into CIA HOTELERA databases ([more info in the section "Data consolidation and customer management at the group level"](#)).

### **b) Registration and control of travelers.**

In compliance with Royal Decree 933/2021, which establishes the documentation and information obligations for individuals or legal entities engaged in accommodation activities, the HOTEL is required to collect and register the following categories of personal data of guests, including minors listed in a reservation:

- Identifying data (name, surname, and signature);
- Data related to their identity document (type of document, identification number, and document support number);
- Personal characteristics data (nationality, date of birth, gender, place of habitual residence, and in the case that any traveler is a minor, the relationship of kinship between them);
- Contact details (landline phone, mobile phone, and email address);
- Reservation-related data (date of reservation, booking reference, number of travelers, check-in and check-out date and time);
- Payment-related data, which includes:
  - Payment method used (cash, credit card, online payment platform, bank transfer, etc.);
  - Payment method identification;
  - Cardholder name of the payment method;
  - If payment is made by card, card expiration date;
  - Date of payment;

The traveler registration form is used to communicate these data to the competent authorities (Law Enforcement Agencies). Additionally, at the HOTEL, staff must validate and verify that the information provided in the traveler registration form matches the data recorded in the corresponding identity document.

The guest data included in the traveler register books will be retained for three years, counting from the date of the last entry in the registration sheets that comprise them.

### **c) Check-in at the HOTEL reception.**

Upon arrival at the HOTEL, reception staff will require presentation of your ID, passport, or TIE to extract, through an optical character recognition (OCR) process, only the necessary data to complete the traveler registration form. The OCR process does not copy or store any image of the identity document; it is limited to capturing only the data necessary for its registration in the traveler form.

The legal basis supporting the use of OCR for data extraction is the legitimate interest of the HOTEL to streamline and optimize the check-in process. The balancing of this interest against your rights and freedoms has been determined as follows:

- The processing is compatible with the reasonable expectations of data subjects, as they are HOTEL guests.
- Automated traveler registration also benefits clients by reducing wait times at reception upon arrival.
- The impact of this processing on the privacy of data subjects is limited, as data extracted from the identity document are transferred directly to the traveler registration form. Furthermore, technical measures have been implemented to ensure that only the data strictly necessary for the intended purpose are processed, avoiding any excessive treatment.
- In any case, the customer may object to this processing and provide their identification document to our staff for manual completion of the required fields in the traveler form.

#### **d) Accommodation of special needs.**

The health data you provide to address special needs, such as allergies or medication intake, will be processed by the HOTEL solely for this purpose. The processing of such data is based on the explicit consent given when requesting special assistance or providing this information during the registration of a child at the kids' club or requesting SPA treatments if these services are available. These data will be deleted at the end of your stay. You may revoke your consent for the processing of your health data at any time by notifying the reception; however, doing so may result in the inability to provide the requested special assistance or service.

Health data provided by guests for addressing special needs are deleted daily for non-staying guests and after their stay for guests who are accommodated at the HOTEL.

#### **e) Billing of services.**

The HOTEL will process the identification data of the reservation holder, financial data, and transaction details related to goods and services, in order to bill the services and charges that may have been generated during your stay, based on the established contractual relationship, for accounting and administrative management purposes and to comply with the legal obligations of the HOTEL in accounting and tax matters.

The HOTEL will retain the economic and transaction data related to goods and services generated during your stay for the period required by current accounting and tax regulations.

#### **f) Handling of Complaints.**

The data included in any complaints you submit will be processed by the HOTEL for the purpose of addressing them. This processing is necessary for the performance of a contract or to take pre-contractual measures at your request. If your complaint relates to services provided by third-party suppliers, it will be communicated to the affected suppliers. The processing of any health data you may have provided in your complaint is covered under Article 9.2.f) of the GDPR, as such processing is necessary for the formulation, exercise, or defense of legal claims.

Official complaints, reports, and claims involving an incident will be forwarded to the legal department of CIA HOTELERA for management, and the data will be stored in their databases ([more info in the section "Control and improvement of quality at group level"](#)). Depending on the nature of your complaint, the recipients of the data may include, among others, public administrations or entities, official organizations, lawyers, judges and courts, or insurance companies.

Data included in any complaints and claims will be retained for one year after their resolution.

#### **g) Data Consolidation and Customer Management at Group Level.**

The data provided by customers staying at hotels under the UNIVERSAL HOTELS brand, along with data generated during their stays, are consolidated into databases owned by CIA HOTELERA

The categories of data consolidated include:

- Identifying Data: Name, surname, country of residence, postal address, billing or shipping address, email, fax, mobile number;
- Personal Characteristics Data: Gender, date of birth, family details (marital status: children, adults, minors), language;
- Reservation Details: Stay dates, number and ages of guests, included services, and consumption during the stay (purchases, use of services, meals and beverages consumed, use of facilities);
- Data provided in complaints and claims;
- Transaction Data related to goods and services.

The purpose of this consolidation is to create a group-wide customer register, standardize formats and coding of information, and enable centralized management of operational processes common to all UNIVERSAL HOTELS accommodations. This consolidation is based on the legitimate interest recognized by Recital 48 of the GDPR, which allows the

transmission of personal data within a corporate group for internal administrative purposes.

Customer data stored in by CIA HOTELERA's database will be retained as active for 5 years from the end of the contractual relationship. After this period, the data will be pseudonymized, without prejudice to their retention during applicable legal periods and the time necessary to address liabilities arising from the processing.

#### **h) Online Check-in.**

At CIA HOTELERA, we offer our guests the possibility to perform online check-in before arrival, allowing them to complete the traveler's information in advance. This streamlines the registration process and reduces waiting times at reception.

The necessary data for the check-in process will be obtained from the online check-in form. Upon arrival at the hotel, only identity verification and confirmation of the accuracy of the provided information via presentation of the relevant ID document will be required.

If you have previously stayed at a hotel within the UNIVERSAL HOTELS brand, we will use the consolidated data to expedite your check-in process for future stays, especially if you perform online check-in. This processing is based on the contractual relationship established with you as a customer of the brand and our legitimate interest in improving your experience.

#### **i) Management Control and Business Data Analysis.**

CIA HOTELERA will process the economic and transaction data related to goods and services obtained from the consolidated customer and reservation data to generate reports and analyze business data for the purposes of business intelligence and management control.

These analyses and reports will be provided in the form of aggregated data and will serve to compile statistics and forecasts, facilitate decision-making, optimize processes, measure the performance of the tourist products offered by the group, and establish commercial strategies.

These treatments are based on the legitimate interest of CIA HOTELERA in having a consolidated view of its businesses for business decision-making and internal administrative purposes. To weigh this interest against their rights and freedoms, the following has been determined:

- Recital 48 of the GDPR recognizes the legitimate interest in transmitting personal data of customers within a corporate group for internal administrative purposes.
- The processing is compatible with the reasonable expectations of the data subjects, as it involves customers of companies within the group or travelers included in bookings processed by them and occurs within the framework of ongoing relationships maintained with said group.

- Technical and organizational measures have been implemented to limit the impact of the processing on the privacy of the data subjects, particularly to prevent the identification of individuals by users generating reports and analyses. These measures include separating the systems used for management control/business intelligence from other operational systems, especially from the system used to carry out marketing campaigns, as well as separating functions between the people who are users of the business intelligence tools and those responsible for administering the group's systems.

The data processed for management control and business data analysis purposes are stored indefinitely. The data will be pseudonymized once the retention period of the information in the group's database, as indicated in the previous paragraph, expires.

#### **j) Control and improvement of quality at the group level.**

To evaluate customer satisfaction and the application of UNIVERSAL HOTELS standards by the group's HOTELS, CIA HOTELERA may conduct quality surveys both during and after the stay, contacting you for this purpose via the email provided at the time of your registration at the accommodation. You may oppose receiving our post-stay surveys by sending an email to [privacy@universalhotels.es](mailto:privacy@universalhotels.es). For the same purpose CIA HOTELERA will process the information you provide in complaints submitted at the HOTEL.

This processing is based on the legitimate interest of CIA HOTELERA to improve the quality of the services and products offered. To weigh this interest against your rights and freedoms, the following has been determined:

- The processing is necessary to understand customer opinions about their stay and identify areas for improvement.
- The processing is compatible with the reasonable expectations of the data subjects, as it involves customers who stay or have stayed at a HOTEL in the group and is a common practice in the sector. Additionally, the sending of potential post-stay surveys is carried out to the email address provided by the data subjects as a contact point.
- The impact of the processing on the privacy of the data subjects is limited, as surveys and suggestion forms are anonymous and their completion is entirely voluntary.

If you provide data that allow your identification in the suggestion forms or satisfaction surveys, such as your name or room number, this information will be received and processed by the HOTEL so that they can contact you regarding the complaint or suggestion you have made. This processing is based on the legitimate interest of the HOTEL to improve the quality of its services and products and customer service. To weigh this interest against your rights and freedoms, the following has been determined:

- The process is compatible with the reasonable expectations of the data subjects, as it involves customers who have submitted a complaint or suggestion related to the service received, voluntarily providing data that identify them.
- The impact of the processing on the privacy of the data subjects is limited, as the purpose of contact is solely to resolve complaints or discuss suggestions raised by the data subjects, which also benefits them by improving service quality and customer care levels.

**k) Commercial exploitation of customer and user data from the brands of the group, for example, for sending commercial communications.**

Customer and potential customer data of the hotels of the UNIVERSAL HOTELS brand are consolidated into a commercial database owned by CIA HOTELERA and UNIVERSAL FLUGREISEN for direct marketing purposes.

Sending non-personalized commercial communications and managing distribution lists (segmentation): CIA HOTELERA and UNIVERSAL FLUGREISEN will process the identifying and contact data you have provided, along with information about your status as a customer, language, and country of origin, to send you non-personalized commercial communications about the tourism products and services of the UNIVERSAL HOTELS brand.

To manage these communications, CIA HOTELERA and UNIVERSAL FLUGREISEN segment recipients based on objective criteria such as country of origin and language. This processing involves a simple classification based on objective criteria and is not intended to create commercial profiles, predictions, or behavioral analyses.

Your inclusion in this database for the purpose of sending non-personalized commercial communications is based on the consent you have been asked for. Not providing or withdrawing your consent does not condition the execution of your reservations or the provision of the services you have contracted. You may revoke your consent at any time and request to unsubscribe from treatments for commercial purposes by activating the link provided for this purpose in the commercial communications themselves or by sending an email stating “unsubscribe pub” in the subject line to: [privacy@universalhotels.es](mailto:privacy@universalhotels.es).

Data processed for commercial purposes will be kept active as long as you do not request their deletion or revoke your consent for processing such data for this purpose. The proof of your consent, such as signed forms, electronic form submission logs, check-in sheets, will be retained throughout the duration of the processing and applicable statute of limitations.

**3. To whom can we communicate your data?**

We will share your data among group companies in the situations described in the previous sections and, where appropriate, we will communicate them to third parties due

to legal obligations, with your prior consent, or when necessary to provide the services requested. Specifically:

If your reservation includes ancillary services provided by third-party providers or your requests involve such services, the necessary personal data for processing the reservation/availability request will be communicated to the relevant providers, solely for this purpose. These communications are necessary for the provision of the requested services or for the application of pre-contractual measures at your request.

#### **4. How long will we keep your data?**

In general, customer and guest data will be kept during the duration of the relationship they maintain with the HOTEL and the entities managing the UNIVERSAL HOTELS brand and, in any case, during the periods provided for in applicable legal provisions and for the time necessary to address possible liabilities arising from the processing. Your data will be deleted or anonymized once they are no longer necessary or relevant for the purposes for which they were collected.

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

You have the right to obtain confirmation as to whether we are processing your personal data and, if so, access them. You may also request that your data be rectified if inaccurate or incomplete, and request their deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected.

In certain circumstances, you may request the restriction of the processing of your data. In such cases, we will only process the affected data for the formulation, exercise, or defense of claims or to protect the rights of others. Under certain conditions and for reasons related to your particular situation, you may also oppose the processing of your data. In this case, we will cease processing the data unless there are compelling legitimate grounds for the processing that override your interests or rights and freedoms, or for the formulation, exercise, or defense of claims.

You also have the right to request the portability of your data to be transmitted to another data controller under certain conditions.

You may revoke the consent you have given for certain purposes, without affecting the lawfulness of the processing based on prior consent before its withdrawal. At any time, you can revoke your consent or oppose the processing of your data for direct marketing purposes by sending an email to: [privacy@universalhotels.es](mailto:privacy@universalhotels.es).

In such cases, we will stop processing your personal information for these purposes. You also have the right to oppose automated individual decision-making that produces legal effects on you or significantly affects you in a similar way, when this right is applicable under Article 22 of Regulation (EU) 2016/679.

You also have the right to lodge a complaint with a data protection authority. You can consult the list and contact details of European data protection agencies on the European

Commission's website at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080). To exercise your rights, you should send us a request by postal mail or email to the addresses provided in the section "Who is responsible for the processing of your data?" You can obtain more information about your rights and how to exercise them on the Spanish Agency for Data Protection's website (<https://www.aepd.es>).