

## **MARKETING PRIVACY POLICY**

Last updated: May 2018

This privacy policy applies to the commercial communications issued by UNIVERSAL BEACH HOTELS. Please read it carefully as it contains important information about the processing of your personal data and your rights pursuant to the corresponding legislation in force.

We reserve the right to update our privacy policy at any time for reasons of corporate decisions, as well as to comply with any possible changes to legislation or legal precedents. If you have any queries or require clarification regarding our privacy policy or your rights, you may contact us via the channels indicated below.

### **1. Who is the controller of your data?**

CIA. HOTELERA SANT JORDI, S.A. with Spanish Tax ID No. C.I.F. A07015597, and registered business address at Gremi de Cirurgians i Barbers, 25, Bloque B, 3er piso Pol. Son Rossinyol – 07009 Palma de Mallorca, Spain, and UNIVERSAL FLUGREISEN AG, Gewerbeweg 15, FL-9490 Vaduz, Liechtenstein, managers of the UNIVERSAL BEACH HOTELS brand.

You may contact our Data Protection Officer at [privacy@universalhotels.es](mailto:privacy@universalhotels.es)

### **2. What personal data do we collect?**

Essentially, the data we process can be classified in the following categories:

- Identification and contact data, in particular your email address;
- Personal data such as gender, date and country of birth, nationality and language;
- Financial and transaction data;
- Data relating to your contact history with us.

### **3. Why do we process these data?**

We use the data we collect to send you commercial communications regarding our hotels and services to the email addresses provided. We also use them to draw up statistics and improve the quality of our products and services.

#### **4. Who can we pass on your data to?**

We will not pass on your data unless we obtain your prior consent.

#### **5. Legal grounds for processing**

We send non-personalised commercial communications and devise of statistics and quality surveys on the grounds of our legitimate interest in assessing and promoting our services as well as the consent you have granted to receive them via your email address.

#### **6. How long will we keep your data for?**

The data processed for commercial purposes shall be kept active until the interested party revokes his/her consent or requests their erasure, and, in all cases, for the periods stipulated by the applicable legal provisions, and for as long as necessary in order to respond to any possible liabilities resulting from the processing thereof. The storage media containing your consent for the processing of your data for these purposes, such as signed forms, electronic form sent logs, etc., shall be kept for the entire processing and prescription periods applicable.

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

You are entitled to obtain confirmation as to whether or not we are processing your personal data, and, where appropriate, access said data. You may likewise request the rectification of any incorrect data or the completion of incomplete data. You may also request their erasure when, amongst other reasons, the data are no longer necessary for the purposes they were collected.

Under certain circumstances, you may request the restricted processing of your data. In this case, we shall only process the affected data in order to lodge, exercise or defend complaints or in order to protect the rights of other persons.

In certain cases, and for reasons related to your particular circumstances, you may also oppose the processing of your data. In this case, we shall cease processing your data, except for overriding legitimate reasons that prevail over your interests, rights or liberties, or in order to lodge, exercise or defend complaints.

Notwithstanding the above, you may at any time revoke your consent and oppose the processing of your data for direct marketing purposes, including the creation of commercial profiles. In this case, we shall cease processing your personal data for these purposes. Withdrawal of your consent shall not affect the legality of any processing based on consent given prior to revocation thereof.

Likewise, and under certain circumstances, you may request the portability of your data for transfer to another data controller.

You are also entitled to lodge a complaint before the Spanish Data Protection Agency or any other competent control authority.

To exercise your rights, you must send a request thereto, including a copy of your national identity document or other valid identification document by post or email to the addresses indicated in the section "Who is the controller of your data?"

To revoke your consent to the sending of our commercial communications, it is sufficient to send an email to [unsubscribe@universalhotels.com](mailto:unsubscribe@universalhotels.com)

Further information regarding your rights and how to exercise them is available on the Spanish Data Protection Agency website at <http://www.agpd.es>.