

PRIVACY POLICY FOR CUSTOMERS AND GUESTS

Last updated: May 2018

This privacy policy applies to the data processed carried out at UNIVERSAL BEACH HOTELS properties. 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. This policy is published on the website at www.universalbeachhotels.com, under the section entitled "Privacy UNIVERSAL BEACH HOTELS", which you will find via a link at the foot of each page of our website. It is also available for consultation at the hotel Reception, where you may also request your own personal copy for you to keep.

As a general rule, the fields on our forms that are marked as compulsory must therefore be completed in order to process your requests.

1. Who is the controller of your data?

The controllers of the hotel customers and guests' data are as follows:

The company that is operating the hotel you are staying at (hereinafter the HOTEL, whose identification data are available at the hotel Reception), CIA. HOTELERA SANT JORDI, S.A. (hereinafter UNIVERSAL BEACH HOTELS) 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. The latter two organisations are the managers of the UNIVERSAL BEACH HOTELS brand. The respective scope of liability of the HOTEL and UNIVERSAL BEACH HOTELS is as follows:

The HOTEL is responsible for the processing activities arising from the hotel management operations, such as the hotel's administrative and accounting management; for the management of the bookings, stays and provision of the services contracted; and for handling customer complaints.

UNIVERSAL BEACH HOTELS is responsible for those processing activities affecting the brand and chain hotel management, including, but not limited to, the following:

- Definition and control of the standards applied by the chain's hotels and corporate management control;
- Monitoring and improving quality standards for the chain;
- Commercial exploitation of data corresponding to customers and users of the

group's brands for actions such as the sending of commercial communications.

2. What personal data do we collect?

The data we process are collected from the following sources:

- The forms you fill in and the requests you make, such as your bookings or service requests;
- The information provided when contracting our services;
- The information generated by your stay and the provision of said services.

All these data are provided either directly by you, or by third parties that make requests on your behalf, such as the travel agency that has booked your stay.

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

- Identification and contact data, ID card or passport and signature;
- Personal data such as gender, date and country of birth, nationality, family status and language;
- Financial and transaction data;
- Data related to the booking and generated by your stay;
- Data related to preferences and customer profile, as well as commercial monitoring data;
- Hotels offering SPA treatments or Miniclub services for children may process the health details provided by the customers in order to meet special needs such as allergies and medication.

3. Why do we process these data?

The HOTEL will process your data for managing your bookings and stays, the provision of contracted services and compliance with its legal obligations.

UNIVERSAL BEACH HOTELS will process your data for hotel chain management purposes. This includes the analysis of business data and corporate information obtained from consolidated data regarding customers and guests of hotels in the chain, corporate management controls, statistical purposes, improvements to the quality of group services and the sending of commercial communications. For quality control purposes, UNIVERSAL BEACH HOTELS may conduct opinion surveys, although there is no obligation to fill them out.

4. Who can we pass on your data to?

We will pass on your data in the following situations:

When said communication is a legal requirement, such as passing on data to State security and law enforcement forces.

When required for internal administrative purposes of the business group, on the grounds of our legitimate interests.

With your prior consent, we will pass on your data to the group holding company in Switzerland, UNIVERSAL FLUGREISSEN, where they will be processed in order to send you commercial communications about its hotels around the world.

When necessary in order to provide you with the requested services. For example, if your booking includes additional services provided by third party suppliers, or the availability request you have made affects this type of services, the personal data necessary for processing said booking/availability request shall be passed on to the corresponding suppliers for this purpose only.

Legal grounds for processing

The grounds for the processing of your data by the HOTEL are the execution of the accommodation or service contract and compliance with its legal obligations, with particular reference to the applicable accounting, tax, tourist, security and passenger control legislation.

In the case of chain hotel management, the grounds for processing are based on UNIVERSAL BEACH HOTELS' legitimate interest in processing the consolidated data of its hotels' customers and guests for internal administrative and management control purposes, as well as to assess and promote group services.

The grounds for processing data enabling UNIVERSAL BEACH HOTELS to send offers and commercial communications are based on the consent you are asked to give, although withdrawal of this consent shall not condition the provision of the contracted services.

5. How long will we keep your data for?

Customers and guests' data will be kept for as long as the relationship they maintain with the HOTEL is in force, 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. Your data will be disposed when they are no longer necessary or pertinent for the purposes for which they were collected.

The data processed for commercial purposes shall be kept active until the interested party requests their erasure. The storage media containing your consent for the processing of your data for these purposes, such as signed forms, electronic form sent logs, check-in sheets, etc., shall be kept for the entire processing and prescription periods applicable.

6. 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 privacy@universalhotels.es

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