

PRIVACY POLICY

Pursuant to the provisions of Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights, as well as the General Data Protection Regulation EU 2016/679 and concordant legislation relating to the protection of individuals with regard to the processing of personal data and the free circulation of these data, you will find attached all relevant information on how we treat the personal data you share with us.

I. Controller of Processing

- HOTEL GALAICO S.L.

II - Purposes for which your personal data will be processed

We will process your personal data for the following contractual purposes: (i) to make you an offer about our services, (ii) to answer any request you may do to us, (iii) accommodation advice, (iv) to manage your reservation.

Based on our legitimate interest we will treat your personal data in order to (v) secure our business, (vi) ensure customer satisfaction, (vii) send you relevant information about services by post, (viii) measure the effectiveness of our advertising actions, (ix) conduct satisfaction surveys or (x) investigate fraud or protect our operations or users.

Also, based on compliance with a legal obligation applicable to HOTEL GALAICO S.L., such as tax regulations, prevention of money laundering and terrorist financing or for other legal reasons.

Furthermore, subject to the legal basis of your prior consent, we will also process your personal data in order to send you commercial communications in relation to our services. These communications may be based on the commercial profile drawn up in relation to your consumption habits, use of our services and browsing through our website.



III. Data we collect

We only process the data necessary for the specific purposes identified above. For the purposes mentioned above we will process the following categories of personal data:

- i. Identification data:
- ii. Information related to the service contracted;
- iii. Consumption habits;
- iv. Navigational habits

IV. Legitimation

The legal bases that legitimize the above mentioned treatments are the contract performance, the fulfillment of a legal obligation, the consent of the user and the legitimate interest of HOTEL GALAICO S.L.

V. Data conservation period

We only keep users' personal data to the extent that we need them in order to be able to use them according to the purpose for which they were collected, and according to the legal basis of the processing thereof.

We will keep the personal data as long as there is a contractual and/or commercial relationship with the user, in compliance with a legal obligation for the time indicated by law and for commercial reasons. The personal data provided will be kept as long as you do not exercise the right of deletion, opposition to the processing of your data, revocation of consent, or when the



co-processors consider that they are no longer necessary to develop commercial actions, either because they are not adequate, relevant or outdated.

In any case, HOTEL GALAICO S.L. reserves the right to keep the data properly blocked, without giving it any use, while they may be necessary for the exercise or defense of claims or may result in any judicial, legal or contractual responsibility for its treatment, which must be addressed and for which recovery is necessary.

HOTEL GALAICO S.L. will comply with the provisions of current legislation regarding the duty to delete personal information that is no longer necessary for the purposes for which it was collected, blocking it, in order to be able to meet possible responsibilities arising from the processing of data, and only during the statute of limitations of such responsibilities. Once these periods have elapsed, this information will be definitively eliminated by secure methods.

VI. Recipients of personal data

Service Providers

In order to provide you with the services you have requested, we may share your personal data with our service providers. In any case, you can be assured that we take all reasonable steps to obtain commitments from our suppliers to treat your personal data with the same level of protection with which we treat them.

<u>Legal compliance and security</u>

It may be necessary to disclose your personal data if we are obliged to do so for reasons of public policy, law enforcement or other matters of public importance, to the extent that disclosure is necessary or appropriate and we are required to do so by the competent authorities. Where legally permitted, and to the extent possible, we will inform you prior to such communication.



VII. Data subject's rights

The interested party may exercise the rights of access, rectification, deletion, opposition, portability and limitation by contacting HOTEL GALAICO, S.L. by means of a request to our e-mail address which is established for this purpose: reservas@hotelgalaico.com, by attaching a photocopy of the national identity card (DNI) or equivalent valid in law-document that allows for proof of identity and specifying the right that they wish to exercise.

Any interested party may, at any time thereafter, in the terms established in the data protection regulations in force at any time, revoke the authorization granted for the processing of personal data.

The interested party shall have the right to file a complaint or claim with the Spanish Data Protection Agency (www.agpd.es).

The user will respond, in any case, of the veracity of the provided data, reserving HOTEL GALAICO, S.L. the right to exclude from the services to any user who has provided false data, without prejudice of the other actions that proceed in Right. The user is responsible for communicating any modification of the personal data provided.



VIII. Notifications

All notifications and communications from the user to HOTEL GALAICO, S.L. will be considered effective, for all purposes, when addressed in any of the following ways:

• Sending by email to the following email address: reservas@hotelaalaico.com.

All notifications by HOTEL GALAICO, S.L. to the user will be considered effective when made in any of the following ways:

- Sending by post to the user's address when this has been previously brought to the attention of HOTEL GALAICO, S.L.
- Sending by e-mail to any of the e-mails that the user has previously provided to HOTEL GALAICO, S.L.
- Communication by means of a telephone call to the user's telephone number, when this has been previously brought to HOTEL GALAICO, S.L. 's attention.
- Through emerging messages sent during the provision of services by HOTEL GALAICO, S.L. to the user.

In this sense, all the notifications made by HOTEL GALAICO, S.L. to the user will be considered validly made if they have been made using the data provided by



the user and through the aforementioned means. To these effects, the user declares that all the data provided by him are true and correct, and undertakes to communicate to HOTEL GALAICO, S.L. all changes relating to the notification data.

IX. Knowledge of illicit conducts

In the event that any user or third party considers that there are facts or circumstances that reveal the unlawful nature of the use of any content and / or the performance of any activity in the web pages included or accessible through the website www.hotelgalaico.com, and could constitute a violation of intellectual property rights or industrial or other rights of HOTEL GALAICO, SL, is required to send a notification containing the following data:

- Name, address, telephone number and e-mail address of the claimant.
- Specification of the alleged illegal activity carried out on the website and, in particular, in the case of an alleged violation of rights, precise and specific indication of the protected contents, as well as their location on the website.
- Facts or circumstances that reveal the illicit nature of said activity.
- In the event of violation of rights, handwritten signature or equivalent, with the personal data of the owner of the rights allegedly infringed or the person authorized to act on behalf of it.
- Express, clear and under the responsibility of the claimant that the
 information provided in the notification is accurate and of the illicit nature
 of the use of the contents or of the carrying out of the described activities.



X. Applicable Law

This Privacy Policy is governed in each and every one of its points by current legislation.

The parties agree that in the event of any conflict of legal nature, they shall be subject to the Courts of the city of Madrid.