

# PRIVACY POLICY

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Confidentiality and security are of prime importance to URH HOTELS and, consequently, we undertake to ensure the user's privacy at all times, and to refrain from gathering unnecessary information. Below, you will find all the information you need about our Privacy Policy with regard to the personal data we gather. It explains:

- who the controller of your data is;
- the purposes for which we gather the data we request;
- why it is legitimate for us to process your data;
- how long we keep your data for;
- who the recipients of your data are;
- what your rights are.

## 1. Controller

The data controller is URH HOTELS, which comprises the following companies:

- **URH HOTELIERS SL (B55190334)**  
C/ Mestre Francesc Civil, 6, 17005, Girona.
- **BIGSALE SPIRIT SL (B55311849)**  
c/ Aribau, 171, 08036, Barcelona.
- **GIRONA CONFORT SL (B59051581)**  
Camí del Molí, s/n, 17257, Torroella de Montgrí.
- **GESTHOTEL ACTIVOS SL (B55199947)**  
Avda. Cristóbal de Murrieta Hiribidea, 27, 48980, Santurce.
- **GESTHOTEL TOSSA SL (B55259444)**  
Avda. Costa Brava, 25, 17320, Tossa de Mar.
- **GESTHOTEL LAIETANA SL (B55199913)**  
Camí Ral 648, 08032, Mataró.
- **GESTHOTEL ACTIVOS LLORET SL (B55238943)**  
Passeig Jacint Verdaguer 16, 17310, Lloret de Mar.
- **GESTHOTEL SITGES SL (B55238034)**  
Carrer Port Alegre, 53, 08870, Sitges.
- **GESTHOTEL ACTIVOS BALAGARES SL (B55190334)**  
Avenida de los Balagares, 34, 33400, Avilés.
- **URH MANAGEMENT SL (B65997579)**  
C/ Joan Pons, 1, 17001 Girona
- **GESTHOTEL ACTIVOS BELLAVISTA SL (B55199962)**  
Pujada dels Polvorins, 1, 17004, Girona.
- **GESTHOTEL MÁLAGA SL (B55214936)**  
Av. de Velázquez, 126, 29004, Malaga.

Except with regard to managing room reservations at each establishment, once you have been registered in our database of customers, potential customers, employees, candidates and/or

subscribers, your personal data will be visible to the companies that make up the URH HOTELS GROUP, for reasons related to coordinating the business group and database sharing, and this means that the said companies will also be processors of your personal data.

**Data Protection Officer:**

- **Lant Abogados** (Lant Advisors, S.L.P.); email: [urh@delegado-datos.com](mailto:urh@delegado-datos.com).

**2. Purposes, legitimacy and storage period for processing data sent through:**

- CONTACT FORM.

**Purpose:** To provide you with a means of contacting us and to enable us to respond to your information requests, and, if you agree, to send you marketing and advertising communications about the products, services, activities, offers, discounts and promotions available from the establishments of URH HOTELS, including using electronic means.

**Legitimacy:** The user's consent when they request information from us through our contact form and when they tick the box to accept the sending of information.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS and the parent company of the group for purposes of business organisation and sending commercial information.

**Storage period:** until the request you send through our form is resolved or until it is answered by email, if this has not given rise to further processing. If you have agreed to receive marketing communications, until you request deregistration from the same.

- ONLINE FORM TO RESERVE ROOMS

**Purpose:** To organise and process your reservation and, where applicable, the payment guarantee and/or payment for the same; to enable you to track your reservation, and, if you agree, to send you marketing and advertising communications about the products, services, activities, offers, discounts and promotions available from the establishments of URH HOTELS, including using electronic means.

**Legitimacy:** Reservation and/or service agreement and user's consent when they tick the box to accept.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS and the parent company of the group for purposes of business organisation and sending commercial information.

**Storage period:** For the duration of the reservation and, where applicable, once your stay has taken place, for the statutory time periods. If you have agreed to receive marketing communications, until you request deregistration from the same.

- SUBSCRIPTION FORM FOR PROMOTIONAL NEWSLETTER

**Purpose:** Sending marketing and advertising communications about the products, services, activities, offers, discounts and promotions available from the establishments of URH HOTELS, including using electronic means.

**Legitimacy:** The user's consent upon subscribing to our marketing and advertising communications.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS and the parent company of the group for sending commercial information.

**Storage period:** Until the data subject withdraws the consent and requests deregistration from our communications.

- SENDING OF CV BY EMAIL OR THROUGH THE FORM TO WORK WITH US

**Purpose:** To give us access to your CV, so you can take part in current and/or future selection processes organised by companies of URH HOTELS, for us to perform job profiling and check the references you provide.

**Legitimacy:** The data subject's consent upon signing up for an offer and accepting transfer of the data to the companies of URH HOTELS in order to optimise the employment process for you.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS.

**Storage period:** while staff selection processes are taking place and, when they come to an end, for one year, for future selection processes.

- SENDING EMAILS

**Purpose:** to provide the information you ask for, deal with your requests, and respond to enquiries and questions.

**Legitimacy:** The user's consent when they ask us to provide information through the email address.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS.

**Storage period:** Until the request has been answered by email, if this has not given rise to further processing.

- CHECK-IN FORM FOR OUR HOTELS

**Purpose:** Manage your stay and any associated services, keep a record of customers for future stays at URH HOTELS, jointly manage customer records and send satisfaction surveys and personalised commercial information about our promotions, offers and services, including by electronic means.

**Legitimacy:** Contract for provision of services and consent from the data subject upon accepting the sending of commercial information and satisfaction surveys.

**Recipients:** The companies of URH HOTELS and the parent company of the group for purposes of business organisation and sending commercial information.

Where applicable, to travel agencies or other operators or third parties, to book and manage activities and/or additional services contracted.

Your ID document will be granted to the Authorities by legal obligation (Organic Law 4/2015, on Protection of Citizen Security and development regulations)

as well as other legally established transfers.

**Storage period:** During the statutory time periods. If you have agreed to receive marketing communications, until you request deregistration from the same.

**At establishments that offer a catering service with online reservations:**

- FORM FOR ONLINE TABLE RESERVATIONS

**Purpose:** Organising and processing your reservation and, if you accept, sending you marketing and advertising communications about the products, services, activities, offers, discounts and promotions available from the establishments of URH HOTELS, including using electronic means.

**Legitimacy:** Reservation agreement and user's consent on ticking the box to accept the sending of information.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS and the parent company of the group for sending commercial information.

**Storage period:** for the duration of the reservation and, where applicable, once the service has been provided, for the statutory time periods. If you have agreed to receive marketing communications, until you request deregistration from the same.

**At establishments that offer a service to buy gift vouchers online for services and/or activities:**

- GIFT-VOUCHER FORM

**Purpose:** Processing your purchase orders and, if you accept, sending marketing and advertising communications about the products, services, activities, offers, discounts and promotions available from the establishments of URH HOTELS, including using electronic means.

**Legitimacy:** Execution of the sales contract and the user's consent upon ticking the box to accept the sending of information.

**Recipients:** No data transfer is anticipated, except between the companies of URH HOTELS.

**Storage period:** Until the registered user requests deregistration and, subsequently, for the statutory time periods. If you have agreed to receive marketing communications, until you request deregistration from the same.

**On websites belonging to URH HOTELS where there is a blog form or where a space has been set up for leaving comments:**

- BLOG FORM

**Purpose:** to publish user comments on the blog on the website.

**Legitimacy:** The data subject's consent when they publish their comment.

**Recipients:** The data published will be public for all other users of the website.

**Storage period:** while the comment is published on the blog.

**Obligation to provide your personal data to us and the consequences of refusal.**

To submit personal data, the user must be over 14 years of age and, where applicable, have sufficient legal capacity to enter into contracts.

The personal data requested are necessary to manage your requests and/or provide you with any services you may engage, which means that, if you do not provide them to us, we will not be able to properly assist you or provide the service you have requested.

In any event, we reserve the right to decide whether or not to include your personal data and other information in our databases.

### **3. Recipients of your data**

Your data are confidential and they will be used on an exclusively internal basis for the purposes stated. They will not be transferred to third parties, unless there is a legal obligation to do so and with the exception of the following scenarios:

- Among the companies in the URH GROUP (see companies at: <http://www.urh-hoteliere.com/aviso-legal/>), all of which offer accommodation and catering services. The purpose is to provide you with the services you have engaged and information of all types, offer clarifications, resolve queries and, where applicable, send you marketing and advertising communications about the products, services, activities, offers, discounts and promotions available from all the companies in the URH HOTELS GROUP.
- Where applicable, to the third parties needed to provide the additional activities and/or services that the user has contracted.
- Where applicable, to pass candidate data to employment agencies for candidate evaluation.

### **4. Rights concerning your personal data**

Anyone may, at any time, withdraw the consent they have given for their data to be processed. In no event will withdrawal of this consent affect performance of the subscription agreement or the relations generated prior to the withdrawal.

You may also exercise the following rights:

- request access to your personal data or that they be corrected when they are inaccurate;
- request that they be erased when, among other reasons, the data are no longer needed for the purposes for which they were gathered;
- request limitation on the processing in certain circumstances;
- request opposition to the processing of your data for reasons related to your specific circumstances;
- request portability of the data in the events set out in the regulations;
- other rights recognised in the applicable regulations.

**Where and how to exercise your rights:** in writing to the data controller at its postal or email address, including the reference "Personal Data" and specifying the right you wish to exercise and the personal data concerned:

- c/ Aribau, 171, 08036, Barcelona.
- [urh@delegado-datos.com](mailto:urh@delegado-datos.com).

In the event of disagreement with the company concerning the processing of your data, you can file a complaint with the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)).

## **5. Cookies**

This website uses own and third-party technical, personalisation, analysis and advertising cookies that collect data concerning your connection and/or device, and your browsing habits, for statistical and advertising purposes.

Therefore, when you access our website, pursuant to Article 22 of the Spanish Law on Information Society Services, we request your consent for use and provision of information for the same.

## **6. Personal data security**

To preserve the security of your personal data, we would like to inform you that we have adopted all necessary technical and organisational measures to ensure the security of all personal data provided concerning the alteration, loss and unauthorised handling of, and access to, the same.

## **7. Updating your data**

To enable us to keep your personal data up-to-date, it is important for you to notify us if they have been subject to any changes; otherwise, we will not be accountable for their accuracy.

We will accept no liability for any privacy policies concerning the personal data you may provide to third parties via links available on our website.

This Privacy Policy may be amended to adapt it to any changes that may take place on our website, and to any legislative amendments or modifications to case law related to personal data that may arise from time to time, which is why you are asked to read it every time you provide your data to us through this website.