

URA HOTELS' PRIVACY POLICY

CONTROLLER OF THE DATA PROCESSING

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Hereinafter URA HOTELS

This policy defines the conditions of use of this domain: www.urahotels.com and its social networks on Facebook and Instagram and we encourage you to read said privacy conditions.

URA HOTELS wishes to inform our web-site Users and specially our guests and Users, of its policy regarding the processing and protection of personal data that are collected here when you view the site or use the services offered on it.

“Personal data” is understood to be any information about an individual, either identified or identifiable (the person concerned) an identifiable individual shall be considered to be any natural person whose identity can be determined, directly or indirectly, such as for example a name, an identification number, localisation details, an on-line identifier or one or more personal elements of their physical identity, physiology, genetics, psychological makeup, financial, cultural, social or other details regarding that person.

MINORS

Details pertaining to Minors shall in no event be collected, as we only allow adults with full legal capacity to register and hire services from our website. If you are a minor and have accessed this website, we hereby inform you that you may not register. Thus, URA HOTELS has established a procedure to guarantee at all times that whosoever applies to register, must not only be of legal age, but must also comply with professional requirements required for the proposed professional activity.

COMMITMENT

URA HOTELS has made the effort to create and maintain a secure and reliable space where full development of professional activity can be carried out, therefore we display some of the principles designed to make you feel safe:

- 1.- We shall never request personal information that is not strictly necessary for rendering the service requested;
- 2.- We shall never disclose your personal information to anyone, except by legal requirement or before we obtain your express consent;
- 3.- We shall never use the data you have provided us with for any purpose other than the one explained and expressed at the time you provide it to us.

URA HOTELS may change this Privacy Policy whenever necessary to adjust it to any change in legal requirements, regulations or to adapt it to any instructions given by the Spanish Data Protection Agency. Thus, URA HOTELS recommends our Users to periodically review these policies in order to be aware of any changes that could have been made to them.

The collection of personal data, processing and then use of it, are subject to current Data Protection legislation in Spain, as well as according to the European Union GDPR and complementary regulations being adopted. URA HOTELS shall only be liable and shall guarantee confidentiality and security regarding personal data collected on the web-site www.urahotels.com and shall have no liability regarding processing and resulting use of personal data that would be made by information society third-party service providers acting outside this web-site.

PURPOSE

The personal data provided by means of the registration form and contact page on this web-site shall be processed by URA HOTELS for the purposes detailed in that section. Users, by ticking a box, expressly and clearly, freely and unmistakably accept that their personal data be processed by the service provider to carry out the following purposes:

1. Registering clients and opening an account;
2. Registering of legal representatives;
3. Study any line of credit with coverage insured by a bond issuer when you apply for it;
4. Invoicing Management;
5. Collections Management;
6. Equipment Repair Management;
7. Management of Training Activities;
8. Management of Commercial Events for the Brands that we represent;
9. Sending Messages in connection with carrying out our Commercial Activity;
10. Historic and Statistical Purposes;
11. In order to offer products or services related to the Technology sector or services to third parties, that could be of interest to Clients;
12. Holding Quality Surveys;
13. Human Resources: assess professional adequacy to the position required and make their participation possible in staff selection processes;
14. Manage and resolve complaints from Users and Guests.

CONTACT AND WEB FORMS

We can process your IP, which OS or Browser you are using and even the duration of your visit, anonymously.

If you provide details on the contact form you fill out, you shall have to identify yourself in the event we need to contact you for:

Reply to your queries, applications or requests;

Manage the service requested, answer your application or manage your request;

Electronic information regarding your application;

Commercial information or electronic events, where express authorisation has been given;

Analyse and improve the website, regarding our products and services. Improve our professional strategy and communication;

User Acceptance and Consent: in those cases where in order to apply for something you need to complete a form and click on the send button, carrying this out necessarily implies that you have been informed and have expressly granted your consent to the content of the Clause attached to said form or that you accept the Privacy Policy.

WHEN ARE PERSONAL DATA COLLECTED FROM USERS OF THE WEBSITE? URA HOTELS Hereby informs their Users that the gathering of personal data is done by means of the forms and e-mail addresses entered into the Contact site of our website.

If you do not wish for URA HOTELS to submit your personal details for processing, please do not fill out any of the forms on our website. In any case, URA HOTELS will expressly inform you in a legible manner regarding the conditions under which personal data is collected and the purposes for which they shall be used; of the obligation to provide them or not; of Users' rights; the conditions under which rights may be exercised and any other complementary information that would be necessary.

The processing of personal data is understood to be any operation or group of operations carried out whether by automated procedures or not, such as the collection, registration, organisation, structuring, preservation, adaptation or alternation, extraction, consultation, use, communication via transmission, dissemination or any other method of providing access, matching or interconnection, limitation, removal or destruction.

The Controller hereby informs and expressly guarantees Users that their personal data shall not be in any circumstances yielded to third party companies and that, should any processing of data be carried out, the express, informed and unmistakable consent of the individual shall be requested beforehand.

The Controller hereby informs and expressly guarantees that the international transfer of data to third countries shall not be done.

All data requested on the website is mandatory, being necessary to render optimum service to the User. Should all the data not be provided, the Controller cannot guarantee that the information and services provided shall be adapted according to the User's needs.

WHAT PRINCIPLES SHALL WE APPLY TO THE PROCESSING OF YOUR DATA?

We shall apply the following principles to the processing of your data, in compliance with the requirements of the new General Data Protection Regulation the sense and purpose of which we fully share. They are as follows:

Personal data must be processed in a licit, faithful and transparent manner;

Personal data must be collected for explicit and legitimate purposes;

Personal data must be adequate, pertinent and limited to what is necessary related to its processing;

Personal data must be exact and always current;

Personal data must be kept in such a manner that the identification of the individuals shall be kept only as long as is necessary for the purpose of the processing;

Personal data shall be processed in such a manner that guarantees their security.

WHAT LEGAL BASIS HAVE WE GOT TO PROCESS YOUR DATA?

LEGAL BASIS

We hereby explain the legal basis that allows us to process your data:

When you give us your consent;

In compliance with a contractual relationship;

3. Legitimate Interest. In order to better fulfil your expectations and increase your satisfaction as client, when we develop and improve the quality of the services we render and which could interest you. To achieve that goal, we need to process your information, anonymously and without any characteristics that could identify you.

Furthermore, URA HOTELS, in its legitimate interests, wishes to relate to our guests and clients in a friendly and familiar fashion, whereby, in our professional relationship, we might send you Season's Greetings.

These legitimate interests respect your right to the protection of your persona data, to your personal and your family's honour and intimacy. It is desirable and you may demand of URA HOTELS that you should have reasonable expectations that URA HOTELS will use your data anonymously (applying security measures and techniques that guarantee confidentiality and preventing your identification) in order for us to improve the services that we render you and the professional sector that we serve and which we belong to. Remember that, in cases based on legitimate interests, you may always exercise your right to object should you feel it necessary, by contacting info@urahotels.com.

Who do we give your data to? Recipients.

RECIPIENTS

We shall not provide your data to third parties except where required by Law or where you have given us your unmistakable consent, clearly and expressly. Nor will any international data transference take place.

In any case, data shall be shared with or yielded to:

- The manufacturers and/or their national representatives, for the coverage of the respective technical guarantees on the products manufactured and distributed by them.
- In order to provide a swift response in the event of break-downs, data could be sent to those companies that outsource technical services, always acting as a subcontracted processing person;
- Public services responsible for the producing of official statistics;
- Private organisations with whom agreements are signed for cooperation within the framework of the functions of URA HOTELS, for example for training and professional certification;
- Insurance companies, for mandatory insurance policies or with the consent of the client, for professional responsibility;
- To the providers of services that act as controllers of the data processed;
- Communications media that carry out business and training activities, social and/or leisure events, including corporate web pages and their social networks;
- In the event of non-payment, provide your data to fully solvent companies;
- Any other which might arise from current legislation.

WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE YOUR DATA TO US?

The right to information: you are entitled to be clearly informed BEFORE your data is collected, regarding which data of yours shall be processed, for which purpose, where the data has been obtained and if they shall be provided to others or have been provided to anyone;

The right to Access: to learn which of your data is being processed, for which purpose, where the data has been obtained and if it shall be provided to others or has been provided to anyone;

The right to rectify: to change any inaccurate or incomplete data of yours;

The right to cancel: You may cancel your inadequate or excessive data;

The right to oppose: to prevent your data being processed or not be processed, although only under those cases provided for by law;

The right to limit the processing: to request that the processing of your data be halted in those cases provided for by Law;

The right to the portability of your data: to receive your data provided in a structured electronic and commonly used format and be able to transmit them to another Controller.;

The right not to be the object of individualised decisions: with the purpose that decisions based only on the processing of your data are not taken about you which could produce legal effects or affect you;

- Any client is entitled to obtain confirmation from URA HOTELS about themselves and whether we are processing any personal details pertaining to you or not. Interested parties are entitled to access their personal details as well as to request the rectification of inaccurate data or if the case may be, request its deletion when, amongst other reasons, the data is no longer necessary for the purpose for which it was collected.

- In certain circumstances, the individual may request the limitation of the processing of their data, in which case we will only store it for the exercise or defence in the event of claims. You may request the limitation of your data in the following cases:

While the challenge to the accuracy of your data is being verified;

When the processing is illicit, but you oppose the removal of the data;

When URA HOTELS does not need to process your data, but you need it to carry out or defend your claims;

When you have opposed the processing of your data in compliance with a public interest mission or to satisfy a legitimate interest, whilst the motives for legitimate interests are being verified to show if they prevail over your interests;

- In certain circumstances and for reasons related to their specific situation, individuals may oppose the processing of their data. URA HOTELS shall stop processing the data, except for legitimate reasons or the exercise or defence of possible claims.

- In certain circumstances and for reasons related to their specific situation, individuals may request the portability of their personal data. You may receive, in electronic format, the personal data that you had provided us with and those that have been collected by your professional relationship with URA HOTELS, as well as transmit them to another professional guild.

- We hereby advise you of your right to withdraw the consent given to process your data at any time, without this affecting the lawfulness of the processing based on the consent given previous to its withdrawal.

- If you consider that we have not processed your data in accordance with European and National regulations, we hereby remind you that, by legal imperative, you are entitled to present a claim at the Spanish Data Protection Agency (www.agpd.es), should you feel that the data processing is not in accordance with European regulations:

- You may exercise your rights by proving your identity (a photocopy of your Spanish National Identification Card or other) and sending an e-mail to this address: info@urahotels.com.
- Exercising these rights is free-of-charge.
- Furthermore, at any time you may withdraw consent given without this affecting the lawfulness of the processing by sending your request to the above-mentioned address or visiting the main offices of URA HOTELS. Remember to include your DNI (Spanish National ID Card) or an equivalent method of proof of your identity with the application.

HOW LONG WILL WE KEEP YOUR DATA?

LENGTH OF STORAGE

Depending on the types of data which are being processed:

- The personal data provided shall be kept as long as one remains a client;
- The data shall be kept indefinitely unless the individual should request it be removed;
- For the duration of the legal obligations imposed in the tax and/or corporate areas.
- Once the contractual relationship has been concluded, the data shall be blocked for the statute of limitations period which is generally ten years, in application of the regulations regarding the prevention of money laundering and funding of terrorism.

HOW CAN I EXERCISE MY RIGHTS?

To exercise any of your rights, you may send an express request to any of the following:

E-Mail: info@urahotels.com

By Post: To the person in charge of Data Protection: Av. Juan Bosch Millares, 3- Urb. Sonneland-35100- San Bartolomé de Tirajana.

Or by personally visiting the URA HOTELS Main Offices at the address mentioned above.

- 1.- Photocopy of identification papers (Passport or any other identity document) or electronic signature;
- 2.- The content of the request you are making and if need be, the documentation that verifies it;
- 3.- Address (for the purpose of notifications), date and signature;

If you exercise your rights by means of a voluntary expressly designated representative, you must provide the document or electronic instrument that verifies the Proxy.

WHAT CAN I DO IF MY RIGHTS HAVE NOT BEEN ATTENDED TO?

If you consider that we have not satisfied your request, you may present a complaint at the Spanish Data Protection Agency at their web site at the following address:

<https://sedeagpd.gob.es/sede-electronica-web/vistas/formReclamacionDerechos/reclamacionDerechos.jsf>

URA HOTELS hereby informs you that the exercise of said rights by a third party not legally authorised by the User, could be an act of criminal disclosure and revealing of secrets foreseen in Section Two of Article 197 of the Spanish Criminal Code, punishable by prison sentences of one to four years and fines of twelve to twenty-four months, without prejudice to other consequences which you must face as a result of any civil or administrative action to which the legitimate User and Owner of the personal data as well as URA HOTELS are entitled.

In the same manner, the User may de-register from any of the subscription services by clicking on the “de-register” section in all e-mails sent by the Provider.

The Provider has also adopted all the technical and organisational means necessary to guarantee confidentiality, integrity and availability of the personal data they are processing, as well as preventing loss, alteration and/or access by unauthorised third parties, as provided for in Article 32 of the GDPR.

THE USE OF COOKIES AND THE ACTIVITY FILE

The Provider themselves or a third party hired to render the measuring services, may use Cookies when a User browses their web-site. Cookies are files sent to the browser by means of a web server for the purpose of recording the User’s activity while browsing.

Cookies used by the website are only associated to an anonymous User and their computer and do not provide the User’s personal data on their own.

By means of the use of Cookies, it is possible for the server the website is on to recognise the Browser the User has, in order for browsing to be easier, allowing, for example, already registered Users access to the areas, services, promotions or contests reserved exclusively for them, without having to register on each visit. They are also used to measure audience and traffic parameters, control progress and number of accesses.

The User may configure their browser to notify when Cookies are received and prevent them from being installed in the computer. Please consult the instructions and manuals for your browser for more information.

To use the website, the User does not have to allow any Cookies sent by it or by a third party acting in its name, to be installed, without prejudice to it being necessary for the User to open a session as such in each of the services which require registration or login to be used.

The Cookies used at this site are, in any case, temporary and their only purpose to make the end transmission more efficient. Cookies will never be used to collect information of a personal nature.

IP ADDRESSES

The website servers can automatically detect the IP address and domain name used by the User. An IP

address is a number automatically assigned to a computer when it connects to the Internet. All this information is recorded in an activity file on the duly registered server which allows the later processing of the data to obtain merely statistical measurements, allowing the controller to learn of the number of web page impressions, the number of visits made to the web services, the order of the visits, access points, etc.

SECURITY

The web site makes use of information security techniques generally accepted by the industry, such as firewalls, access control procedures and cryptographic mechanisms, all to avoid unauthorised access to the data. To achieve this purpose, the User/Client accepts to allow the Controller to obtain data for the corresponding authentication of access controls.

INTERNET USE RECOMMENDATIONS

URA HOTELS reminds Users that the Internet is not always as secure as we would like, therefore necessary and adequate technical measures should be adopted to prevent unauthorised processing of your data.

Whenever you provide personal information on the internet by means of e-mail, news groups, forums, etc., be aware that said information can be collected and processed for purposes unwanted by you, therefore URA HOTELS recommends Users to inform themselves regarding the confidentiality and privacy policies on the sites they visit online.

Keep in mind that, unless you use encoded mechanisms, electronic mail on the Internet is not secure. E-mail messages and debate forums may be subject to forgery and identity theft, which you should take into consideration whenever you use them. If you do not wish to make your email address public, configure your Browser so that it does not leave your email address on the web servers that you access.

When surfing around on the Internet, be aware that the web-servers that you visit can register not only the pages you visit, but also the frequency and subjects or materials you are looking for, even if they do not inform you of it. If you do not want to leave evidence of your activities, use servers that maintain your anonymity.

Whenever you can, use the latest versions of the browser applications, which are always adding better security measures. Consider the possibility of activating the options on those programmes that alert you to the exchange of unwanted data.

Use security mechanisms at your reach (secure web servers, cryptography, digital signature, etc.) to protect your confidentiality and the integrity of your data as need may be.

This document sets forth the privacy policy of www.urahotels.com and its site on the Facebook social network, Instagram. This version was updated on July 2nd, 2019.