



PRIVACY POLICY FOR CLIENTS AND GUESTS OF IBEROSTAR GROUP

RGPD-POL-PRIV-CLIENTS

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Date: May 2018
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I INTRODUCTION

This privacy policy applies to all data handling performed in Iberostar Group hotels. Please read this privacy policy carefully: this document contains important information on how your personal data will be handled and on your rights in this regard under the legislation in force.

This policy has been published at Grupolberostar.com/en/Privacy-Portal and it is available at the hotel's reception, where you may request a copy for your records.

As a general rule, any fields on our forms that are indicated as being mandatory must be filled out for the forms to be processed.

1. Who is responsible for processing your personal data?

The controllers in charge of the data of the hotel's clients and guests are:

- The company operating the hotel where you are staying (hereinafter the Hotel), whose identification and contact information are available at the hotel's reception and at iberostar.com and,
- Iberostar Hoteles y Apartamentos, S.L, with Tax Identification Number (C.I.F.) B28049344, and with registered offices at C/ General Riera, 154, 07010 Palma de Mallorca, Islas Baleares, Spain (hereinafter the Iberostar Group), with the Hotel and the Iberostar Group having the following scope of responsibilities respectively.

The Hotel is responsible for any data handling activities derived from managing the hotel, such as: the administrative management and accounting of the hotel, managing reservations and stays, providing the contracted services and handling customer complaints.

The Iberostar Group is responsible for any data handling activities that affect the Iberostar Hotels & Resorts brand and the chain's hotel management, such as:

- Defining and supervising the standards the chain's hotels apply and overseeing corporate management;
- Verifying and improving quality on a chain level;
- Commercial use of the data of the group's brand's clients and users, for example, for sending out commercial communications, creating commercial profiles, or customising the chain's services for its clients.

The Iberostar hotels and the Iberostar Group have signed a contract regulating how client and guest data are handled that ensures their personal data will be properly protected regardless of where the hotels are located. The essential aspects of this contract are available at Grupolberostar.com/en/Privacy-Portal.

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You can contact the Iberostar Group's Data Protection Officer at privacy.dpd@grupoiberostar.com.

2. What personal information do we collect?

The data we handle are the data we collect:

- From any forms you fill out and any requests you send (e.g., your reservations or service requests);
- From the information provided for contracting our services;
- From the information generated by your stays and by the provision of these services.

We obtain these data either directly from you or from third parties that handle requests on your behalf, such as the travel agency you used to book your stay.

The data categories we handle are typically:

- Identifying data and contact information, national identification number and signature;
- Personal characteristics, such as gender, date and country of birth, nationality, family situation and language;
- Economic and transaction data;
- Reservation related data and data generated by your stay;
- Data related to customer preferences and profiles, and commercial tracking data;
- Hotels that offer spa treatments or miniclub services for children may handle the health data provided by the guests themselves to satisfy any special needs, such as allergies or administration of medication.

3. What is the purpose of handling your data?

The Hotel will handle your data to manage your reservations and stays, to provide the contracted services and to comply with its legal obligations. You are hereby informed that the events and activities organised by the Hotel may be photographed or recorded for subsequent publication in the hotel for marketing and leisure purposes.

The Iberostar Group will handle your data to manage the hotel chain. This includes analysing the business and corporate data and information obtained from the hotel chain's customer and guest metadata, and for corporate supervision of management, for statistical purposes, and to improve the quality of the group's services and to send out commercial communications. The Iberostar Group may conduct opinion surveys for quality assurance, although filling them out is not mandatory.

With your consent, the Iberostar Group will create a commercial profile based on your personal data so that it can offer you personalised service in providing the services you requested, and so that it can send you commercial offers customised to your profile. We do not make automated decisions based on the profiles of our clients. The customisation of our services entails your consent so that the group hotels and companies that you contact to purchase or provide services can access your data as a user of the chain, thus consenting to international transfers of your data if the companies are not in the European Economic Area. You can find more information on the privacy policy that applies to the creation and use of Iberostar Group client and user profiles at Grupolberostar.com/en/Privacy-Portal.

4. Who can we share your data with?

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We will only communicate your data in the following situations: where required by law, with your prior consent, to other group companies for administrative purposes, or when necessary to provide you the services you requested. For example, if your reservation includes supplemental services furnished by third-party providers, or if your request for availability might affect these types of services, the personal data necessary for processing your reservation/availability request will be sent to the corresponding provider, solely for this purpose.

Information about your stay will also be communicated to the authorities or law enforcement if so required under the tourist security and control legislation in force in the country in question.

Clients and guests residing on the American continent (except for Cuba) who agree to receive commercial offers will have their identifying data and contact information communicated to Visit Us, Inc., a U.S. tourist product marketing company with headquarters at 9250 NW, 36th St., suite 360, Doral, FL 33178, U.S.A., to send them (including electronically) commercial information related to these products, with the affected parties necessarily providing consent to the corresponding international transfer of their data.

If you have given your consent, the Iberostar Group and the hotels operating under the Iberostar brand will communicate data about your stays and future bookings to the companies that operate the Iberostar The Club loyalty program, namely: Iberoclub N.V., a company established in Curaçao, with registered office at Pietermaai 15, Willemstad, Curaçao and Iberostar The Club México, S.A. de C.V., a company established in Mexico, with registered office at Carretera Chetumal Puerto Juárez km 309, Fracción Playa Paraíso, Municipio Solidaridad, Localidad Playa del Carmen, Estado Quintana Roo, Postcode 77710, Mexico (jointly referred to as Iberostar The Club). This data will be processed by Iberostar The Club for the promotion and management of the aforementioned program.

International data transfers to Visit Us and/or Iberostar The Club are covered by the formalisation of the standard data protection clauses adopted by the European Commission in its Decision 2004/915/EC of 27 December 2004, guaranteeing an adequate level of protection of personal data. You can request a copy of these guarantees from the Data Protection Officer of the Iberostar Group.

5. Legal basis for handling data

The Hotel handles your data pursuant to execution of the lodging or services agreement and in compliance with its legal obligations, especially the applicable legislation on taxes and accounting, the applicable tourism regulations, and the tourist security and control regulations in the country in question.

Any recordings and diffusion of the events and activities organised by the Hotel in which identifiable individuals may appear are performed with the consent of the interested parties.

The Iberostar Group's hotel management on a chain level is based on its legitimate interest in handling the consolidated data of its hotels' clients and guests for internal administrative and management supervision purposes, and so that it can assess and promote the group's services.

The creation of commercial profiles, the customisation of our services and the issuance of personalised commercial offers and communications by the Iberostar Group depend on the consent you are being asked to provide, and providing the contracted services is not predicated on withdrawal of this consent.

6. How long will we store your data?

Client and guest data will be retained so long as the contract between the Hotel and the Iberostar Group remains in force, and in any case for the timeframes specified in the applicable legal provisions and so long as necessary for handling any liabilities deriving from handling the data. Your data will be cancelled once they are no longer necessary or appropriate for the purposes for which they were collected.

In countries where required under the tourist security and control regulations in force, the Hotel will retain their guest registries/logs for the time periods specified in those regulations.

Any data handled for commercial purposes (including commercial profiles) will be retained until they are requested to be deleted. The media containing proof of your consent to handle your data for these purposes (e.g., signed forms, electronic form submission logs, check-in sheets...) will be held for the duration of the data handling and until the end of the applicable statutes of limitations.

7. What are your rights?

You have the right to obtain confirmation whether we are handling your personal data, and if so, to access them. You can also request to have your data rectified if they are inaccurate, or to have any incomplete data completed. You may also ask to have your data deleted for reasons such as their no longer being necessary for the purposes for which they were collected.

In certain circumstances, you may ask to have the handling of your data limited. In these cases, we will only handle any relevant data for preparing, lodging or defending against claims, or in order to protect the rights of others.

You may also oppose the handling of your data in certain circumstances and for reasons related to your specific situation. In these cases, we will stop handling your data except where due to mandatory purposes that prevail over your interests, rights and liberties, or to lodge or defend against claims.

Even so, you may revoke your consent at any time and oppose the handling of your data for direct marketing purposes, including the creation of commercial profiles. In these cases, we will stop handling your personal information for these purposes. Withdrawing your consent will not affect the lawfulness of the handling that was done previously based on your consent.

Under certain conditions, you may request to have your data be transferable so they can be communicated to another data processor.

You also have the right to lodge claims with the Spanish Data Protection Agency or any other competent oversight authority.

If you would like to exercise your rights, you will need to send us a request together with a copy of your national identification card or any other valid document identifying you, by post or email to the addresses indicated in the section entitled **1. Who is responsible for processing your personal data?**

To revoke your consent to have us send you our commercial communications, all you need to do is send an email to: lopd@iberostar.com.

Further information on your rights and how to exercise them can be found on the Spanish Data Protection Agency website at <https://www.agpd.es/>.