

# PRIVACY POLICY

In accordance with the provisions of the General Data Protection Regulation GDPR (EU) 679/2016 and Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights, you are provided with the following information on the processing of your personal data.

## **Who controls the processing of your personal data?**

Data Controller and Data Protection Officer

The Data Controller responsible for the processing of your personal data is CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L., with registered address at C/ HERNAN CORTES, 41, 07590, CALA RAJADA. You can contact the data protection officer at the following email address: [info@crea-hoteles.com](mailto:info@crea-hoteles.com) DATA PROTECTION OFFICER: CONTACT: / <http://www.protecmir.com> / E-MAIL: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

## **What data do we process?**

At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. we process the personal data that you provide by filling in the forms provided for this purpose on this website, as well as any personal data resulting from the provision or contracting of our services or products and/or any personal data resulting from the commercial relationship that you have with us. In addition, we process the personal data generated by your activity on our website, which includes your browsing data obtained through the website.

It is important for us to keep the record of your personal data up to date. You are obliged to keep us informed of any changes or errors in your personal data as soon as possible by contacting us by email: [info@crea-hoteles.com](mailto:info@crea-hoteles.com).

## **What do we process your personal data for?**

Purpose: Your personal data is processed for the following purposes:

- Managing and maintaining the services provided through the website.
- Managing and servicing queries and requests for information made by users through the contact form. The email address and personal data that you provide us with through the contact form on the website will be used exclusively to deal with the queries that you send us by this means.
- Compliance with applicable legal obligations.
- Sending commercial communications and newsletters, and advertising our services and products.
- Managing the contracting of our services and/or products.
- If you have given your consent and in order to be able to offer you services relating to your interests, your personal data may be used to draw up a commercial profile. No automated decisions will be made based on said profile.

How long will we keep your personal data?

We keep your personal data in our systems and files for as long as is needed to carry out the purposes of the processing, and to comply with applicable legislation. Your personal data will be kept for as long as there is a contractual and/or commercial relationship with you, or as long as you do not exercise your right to the deletion and/or restriction of processing of your data. The length of time for which personal data is kept will vary depending on the purposes of the processing, and in general terms:

- The personal data that you provide when contracting our services or products will be kept for the duration of the contractual relationship and, once said relationship has ended, for the legally mandated period of time with regard to any legal actions arising from said relationship.
- The personal data you provide in order for us to manage requests for information or queries through the contact form will be kept as long as you do not request for said data to be erased or cancelled.
- The personal data you provide to subscribe to our newsletter or bulletins will be kept as long as you do not request its deletion, indicate your opposition and/or request its limitation.
- The personal data obtained from your browsing and consumption habits, as well as the commercial profile obtained, will be kept as long as you do not request its deletion or cancellation.

Your personal data will be kept for as long as it is useful for the purposes indicated and, in any case, for legally mandated periods and for length of time necessary to address any possible liabilities arising from the processing of said data.

### **Data security**

We have appropriate technical and organisational security measures in place to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, and to ensure the integrity and confidentiality of your personal data. The technical and organisational security measures implemented make it possible to: guarantee the permanent confidentiality, integrity, availability and resilience of the processing systems and services; restore the availability of and access to personal data promptly in the event of a physical or technical incident; and regularly verify, evaluate and assess the effectiveness of the technical and organisational measures implemented to ensure the security of the processing. These technical and organisational security measures have been designed taking into account our IT infrastructure, the state of the art in accordance with current standards and practices, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity of the processing to your personal data.

### **What is the legitimacy for the processing of your data?**

Legitimacy: The legitimacy to process your personal data is based on:

- Executing and maintaining a contractual and commercial relationship with you, such as contracting the organisation's products and services, and managing and

processing requests for quotes for the organisation's products and/or services, all in accordance with the provisions of Article 6.1.B of GDPR (EU) 679/2016 and Organic Law 3/2018, of 5 December (LOPDPGDD).

-Your express consent for one or more purposes, such as sending you our own or third-party advertising communications or newsletters, managing how curricula vitae are sent, and taking part in activities or competitions, all in accordance with the provisions of article 6.1.A of GDPR (EU) 679/2016 and Organic Law 3 /2018, of 5 December (LOPDPGDD ).

-Compliance with various legal obligations, all in accordance with the provisions of Article 6.1.C of GDPR ( EU ) 679/2016 and Organic Law 3/2018, of 5 December (LOPDPGDD ).

-Meeting the legitimate interests pursued by the data controller or by a third party, e.g. for security reasons, to improve our services and/or to manage requests or queries.

During the data collection process, and in each place on the website where personal data is requested, the user will be informed by means of a hyperlink or by the inclusion of appropriate mentions on the form itself of the mandatory nature or otherwise of the collection of their personal data.

The personal data requested in the forms on the website are, in general, mandatory (unless otherwise specified in the required field) in order to comply with the established purposes. Therefore, if the personal data requested is not provided, or is not provided correctly, the request cannot be fulfilled.

There is an obligation to provide your personal data when contracting a service or product, and/or when requesting a quote or offer.

The sending of advertising communications, newsletters or bulletins about our products and services is based on the consent that you are asked for, and under no circumstances does the withdrawal of this consent affect the contractual or commercial relationship that you have with us.

If you have authorised us to send advertising for our services and products, your personal data may be used to manage the sending of advertising offers and newsletters by electronic means. In these cases, the provisions of articles 20 and 21 of Law 34/2002, of 11 July 2002, on information society services and electronic commerce, apply to the use and processing of your personal data for the purpose of sending advertising by electronic means.

If you have ticked the option to receive advertising, or if you have subscribed to our newsletter, you can cancel this option at any time.

With which recipients will your data be shared?

Recipients: In general, your personal data will not be shared with any third party outside the organisation, unless there is a legal obligation to do so. However, you are informed that third-party providers may have access to your personal information as data processors in the context of providing a service for the data controller organisation. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [info@crea-hoteles.com](mailto:info@crea-hoteles.com). In addition to the above, the

organisation may transfer or communicate personal data in order to fulfil its obligations to the Public Administrations in cases where this is required, in accordance with the legislation in force.

-No international data transfers are foreseen. No decisions are made with regard to adaptation, guarantees, binding corporate rules or specific applicable situations.

What rights do you have in the processing of your personal data?

Your rights: You have the right to obtain access to your personal data, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer necessary for the purposes for which it was obtained. In certain circumstances, you may request that the processing of your data be limited, in which case we will only retain it for the purpose of filings or defending complaints. Additionally, and for purposes related to your particular situation, you may oppose the processing of your data, in which case your personal information will no longer be processed for those purposes to which you have stated your opposition. Where technically possible, you may request the portability of your data to another data controller. To exercise these rights, in accordance with current legislation, you can send a letter by post, enclosing a copy of a document proving your identity (DNI), to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590, CALA RAJADA or send an email to [info@creahoteles.com](mailto:info@creahoteles.com). You have the right to lodge a complaint with the supervisory authority: Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

Origin of personal data: the data subject.

You expressly accept the inclusion of the personal data collected while browsing the website and/or provided by filling in any forms, as well as any data resulting from a possible commercial relationship, in the organisation's automated personal data files. The organisation guarantees the confidentiality of users' personal data. However, when required to do so, the organisation will disclose personal data to the relevant public authorities, along with any other information in its possession or which is accessible through its systems, in accordance with the legal and regulatory provisions applicable to each case. Personal data may be kept in the files owned by CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. even after the commercial relations formalised through the organisation's website have ended, solely for the purposes indicated above and, in any case, for the legally established periods, at the disposal of administrative or judicial authorities.

Use of social media

When you interact with our website through various social media platforms, such as when you connect to or follow us or share our content on social media platforms (Facebook, Twitter, LinkedIn, Instagram or others), we may receive information from these platforms, including information about your profile, user ID associated with your social media account, and any other public information that you allow to be shared with third parties on said platforms.

The organisation uses social media as a way to provide information about the services it offers, as well as any other activity or event that it carries out and wishes

to publicise, but at no time will it obtain personal data from users interacting on said social media platforms, unless there is express authorisation to do so.

This data is only used within the social media platform itself and is not incorporated into any processing system.

Social media platforms have their own terms of use and privacy policies that you are obliged to take into account and observe if you use them.

In cases of registration and/or access through a social media account, the organisation may collect and access certain information from your user profile on said platform, solely for the purposes indicated above.

Below we will provide you with information regarding the processing of your personal data carried out by CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L  
INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE  
PROCESSING OF THE PERSONAL DATA OF CUSTOMERS RESERVATIONS

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

RESPONSIBLE / MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L - Fiscal ID code: b57940546 Address: C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA Telephone: + 34 971818284, Email address: INFO@CREA-HOTELES.COM. Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

IPURPOSE: At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L, we process the information you provide us in order to provide you accommodation in our hotel and/or the services of our establishments, in addition to managing the sending of information and commercial research and invoicing thereof. We will develop a commercial profile based on the information provided in order to be able to offer you our services in accordance with your interests. No automated decisions will be made based on this profile. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or make any reservation. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

LEGAL BASIS: Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract; we are also obliged to process your personal information to comply with a legal obligation that applies to the data controller. In any event, you have given your consent for your personal information to

be processed for one or more specific purposes, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (ART 6.1. A. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: (LOPDPGDD). Act 1/1992, modified by Organic Law 4/2015 of 30 March on the Protection of Public Safety, shall apply. Resulta de aplicación la Ley de Servicios de Sociedad de la Información 34/2002, artículos 20 y 21, para el envío de ofertas comerciales mediante telecomunicaciones. While the prospective offer of services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase and/or provision of the service under any circumstances. The personal data must be provided, otherwise the hotel accommodation service and/or the requested offer cannot be provided. While the prospective offer of products and services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase of any product and/or service under any circumstances.

IRECIPIENTS: No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

RIGHTS: Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF CUSTOMER SATISFACTION SURVEY

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

RESPONSIBLE / MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L - Fiscal ID code: b57940546 Address: C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA Telephone: + 34 971818284, Email address: [INFO@CREA-HOTELES.COM](mailto:INFO@CREA-HOTELES.COM). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

PURPOSE: At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L, we process the information you provide us in order to know your level of satisfaction for your stay at our establishment. We will develop a commercial profile based on the information provided in order to be able to offer you our products and services in accordance with your interests. No automated decisions will be made based on this profile. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or make any reservation. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

LEGAL BASIS: Personal data processing is based on your consent for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase and/or provision of the service under any circumstances. Personal data must be provided or otherwise the satisfaction survey cannot be completed. The personal data must be provided, otherwise the requested offer cannot be provided. Consent must be provided in order to be able to make prospective offers and send you commercial information.

RECIPIENTS: No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data

processors, within the framework of the provision of a service for the Data Controller company. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

#### INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF PASSENGER REGISTRATION PART.

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER:** CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L - Fiscal ID code: b57940546 Address: C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA Telephone: + 34 971818284, Email address: [INFO@CREA-HOTELES.COM](mailto:INFO@CREA-HOTELES.COM). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L., process the information you provide us with in order to provide you with the requested hotel accommodation service and to comply with the documentary and information registration obligations set forth in Royal Decree 933/2021, of 26



October, for companies that carry out accommodation and hotel accommodation activities. No automated decisions will be made based on this profile. The data that you provide us with and that we process in a digital register must be kept for a minimum period of three years from the end of the service or provision contracted. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract. We are also obliged to process your personal information to comply with a legal obligation that applies to the data controller, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (Art. 6.1. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: (LOPDPGDD). Royal Decree 933/2021, of 26 October, which establishes the documentary registration and information obligations of natural or legal persons who carry out accommodation and motor vehicle rental activities, is applicable. Organic Law 7/2021, of 26 May, on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offences and the execution of criminal sanctions also applies. The personal data must be provided, otherwise the hotel accommodation service cannot be provided.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [info@crea-hoteles.com](mailto:info@crea-hoteles.com). Your personal data will be communicated to the Secretary of State for Security and may only be processed by the Security Forces and/or the corresponding authorities. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may

request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF PERSONAL DATA OF WEBSITE USERS

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

RESPONSIBLE / MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L - Fiscal ID code: b57940546 Address: C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA Telephone: + 34 971818284, Email address: [INFO@CREA-HOTELES.COM](mailto:INFO@CREA-HOTELES.COM). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

PURPOSE: We at CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L process the information that you provide us with in order to provide the services and/or sell the products that you have contracted through our website and to manage the sending of information and commercial research. We will develop a commercial profile based on the information provided in order to be able to offer you our services in accordance with your interests. No automated decisions will be made based on this profile. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or purchase anything. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

LEGAL BASIS: Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract, and in any event you have given your consent for your personal information to be processed for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A. B) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of

Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of products and services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase of any product and/or service under any circumstances. The personal data must be provided, otherwise the service requested cannot be provided and/or the product sold and/or the requested offer cannot be provided and the sending out of commercial information cannot be managed.

RECIPIENTS: No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

RIGHTS: Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

#### INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF SUPPLIERS

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

RESPONSIBLE / MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L - Fiscal ID code: b57940546 Address: C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA Telephone: + 34 971818284, Email address: INFO@CREA-HOTELES.COM. Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

PURPOSE: We at CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L process the information that you provide us with in order to complete the order and invoice the services. While the commercial relationship remains in effect and no request for cancellation is made, the personal information provided will be retained for a period of 5 years after the last contract has been formalised. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

LEGAL BASIS: Personal data processing is based on the performance of a contract, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. B) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD).

RECIPIENTS: No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

RIGHTS: Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES,

41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF INVOICES / ACCOUNTING

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

RESPONSIBLE / MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L - Fiscal ID code: b57940546 Address: C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA Telephone: + 34 971818284, Email address: [INFO@CREA-HOTELES.COM](mailto:INFO@CREA-HOTELES.COM). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

PURPOSE: At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L we process the information that you provide us with in order to prepare and produce the invoices for products and/or services and in order to comply with tax and accounting obligations. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or purchase anything. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

LEGAL BASIS: Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract. We are also obliged to process your personal information to comply with a legal obligation that applies to the data controller, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (Art. 6.1. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: (LOPDPGDD).

RECIPIENTS: No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when

required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

#### INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF CURRICULUM VITAE

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**MANAGER:** CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. Fiscal ID code: b57940546. Address: C/ HERNAN CORTES, 41, POSTAL CODE: 07590 CALA RAJADA. Telephone: + 34 971818284, Email address: [INFO@CREA-HOTELES.COM](mailto:INFO@CREA-HOTELES.COM). Data Protection Officer: Contact: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We at CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L we process the information You provide us with in order to select staff and to allow the applicant to participate in the company's employment selection process. While the relationship with the company remains in effect and no request for cancellation is made, the personal information provided will be retained for a period of two years after the last time your consent was obtained. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for

the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on your consent for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (Art. 6.1. A) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). The personal data must be provided, otherwise you may not participate in the Company's selection process.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

#### INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF WIFFI NEWSLETTER / MAILING

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. with Tax ID: B57940546, ADDRESS: C/ HERNAN CORTES, 41 07590 CALA RAJADA  
TELEPHONE: + 34 971818284, EMAIL: [info@crea-hoteles.com](mailto:info@crea-hoteles.com). Responsible of Data Protection: Contact: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

PURPOSE: At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. we treat your information in order to provide WIFI service, send you personalized offers of services of the company and manage the sending of information and commercial prospecting. In order to be able to offer you our services according to your interests we will elaborate a commercial profile based on the information provided. Automated decisions will not be made based on said profile. The personal data provided will be retained, as long as its express consent is maintained and its deletion is not requested. In any case your personal data will be kept as long as they are useful for the indicated purpose, and, in any case, during the legal deadlines and for the time necessary to attend to possible responsibilities arising from the treatment. At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L we adopt measures that guarantee the permanent confidentiality, integrity, availability and resilience of your personal data. We guarantee the confidentiality of your data through measures. In addition, we have measures in place to ensure that the availability and access to personal data is quickly restored in the event of a physical or technical incident.

LEGAL BASIS: Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract; we are also obliged to process your personal information to comply with a legal obligation that applies to the data controller. In any event, you have given your consent for your personal information to be processed for one or more specific purposes, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (Art. 6.1. A. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: (LOPDPGDD). The Law 9/2014 of May 9, General of Telecommunications and the Law of Services of the Information Society 34/2002, Articles 20 and 21 are applicable. While the prospective offer of products and services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase of any product and/or service under any circumstances. Consent must be provided in order to be able to make prospective offers and send you commercial information.

RECIPIENTS: You are informed that GLOBAL OBI, S.L.U., (tax code): B-57667586 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. You are informed that Hotelinking S.L., (tax code): B57943185 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection



Regulation (GDPR) Regulation (EU) 2016/679. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries. No decisions will be made on the adequacy, guarantees, binding corporate standards or specific situations that apply.

RIGHTS: Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41 07590 CALA RAJADA, enclosing a copy of a document accrediting their identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject/ Hotelinking S.L

ORIGIN: The data is provided by Hotelinking S.L, with TIN B57943185 through the form that you complete to obtain the Wi-Fi service in our facilities. The data affected in this service are the name, surname and email of the user, data that you provide at the time of accepting the Wi-Fi privacy policy.

#### HEADING INFORMATION ART. 13 AND 14 ON THE PROCESSING OF PERSONAL DATA OF VIDEO SURVEILLANCE

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

MANAGER: CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. Fiscal ID code: b57940546. Address: C/ HERNAN CORTES, 41, POSTAL CODE: 07590 CALA RAJADA. Telephone: + 34 971818284, Email address: [INFO@CREA-HOTELES.COM](mailto:INFO@CREA-HOTELES.COM). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** At CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L we process the information obtained via video surveillance cameras for the purpose of preserving the safety of persons, property and the facilities or establishment. It is also for the purpose of monitoring access to the establishment and facilities of the Company or Organisation. Security and/or video surveillance cameras may be used as a means of surveillance and to monitor work activity. The personal information provided will be retained for a period of no more than 30 days following its recording. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** The processing of your personal data is based on the need to meet legitimate interests pursued by the data controller or by a third party in accordance with the provisions of the GDPR EU 679/2016 (Art. 6.1. F) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 22 and 89 of Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights, shall apply. Article 20.3 of the Employment Rights Act shall also apply.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that, as data processors, third-party providers may have access to your personal data as part of the provision of a service for the data controller company. You are informed that images may be processed by the Data Processor in accordance with article 28 of the GDPR. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. There is no arrangement in effect to transfer your data to third-party countries. No decisions are made on suitability, guarantees, binding corporate rules or specific applicable situations.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to CREA HOTELES INVESTMENT & MANAGEMENT 1, S.L. at C/ HERNAN CORTES, 41, CP: 07590 CALA RAJADA, enclosing a copy of a document accrediting their

identity (national identity document), or email [info@crea-hoteles.com](mailto:info@crea-hoteles.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.