

Hotelverse.

PRIVACY POLICY

1. Identification of the Data Controller

HOTELVERSE TECHNOLOGIES, S.L. is RESPONSIBLE for the processing of the USER's personal data and informs you that this data will be processed in accordance with the provisions of Regulation (EU) 2016/679 of 27 April (GDPR) and Organic Law 3/2018 of 5 December (LOPDGDD).

You can contact the Controller by e-mail at hello@hotelverse.tech.

The address for the purpose of complaints shall correspond to the address indicated as the Holder's address.

2. Purposes of processing

- a) Respond to the questions that the interested party sends to the Data Controller.

Retention period: The data will be kept until the issue raised by the data subject is resolved. Subsequently, if necessary, the information will be kept blocked for the legally established periods.

Legal basis: Legitimate Interest of the Data Controller and Consent of the Data Subject.

- b) Manage the interested party's subscription to their Client or User account, as well as access to the services and functionalities of our Clients / Users.

Retention period: The data will be kept as long as the data subject does not revoke the consent granted. Subsequently, if necessary, the information will be kept blocked for the legally established periods.

Legal basis: Consent of the data subject.

- c) To process accommodation bookings made by the user.

Retention period: The data will be processed for as long as there is an interest on the part of the data subject, based on the existing contractual relationship when contracting the hosting service. Subsequently, if

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necessary, the information will be kept blocked for the legally established periods.

Legal basis: Contractual relationship.

- d) To send the interested party commercial communications about our services that may be of interest to them (newsletter).

Retention period: The data will be kept as long as the data subject does not revoke the consent granted. Subsequently, if necessary, the information will be kept blocked for the legally established periods.

Legitimate basis: Express consent of the data subject.

- e) Manage the publication of content or opinions of users, about their degree of satisfaction with their experience using our services or the facilities of our hotel.

Retention period: The data will be kept as long as the data subject does not revoke the consent granted. Subsequently, if necessary, the information will be kept blocked for the legally established periods.

Legitimate basis: Express consent of the data subject.

3. Recipients of your data

The Data Controller contracts with third party processors in order to provide its services. With the exception of these entities, your data will not be disclosed to other third parties. If for any reason it is necessary to communicate such data to third parties, you will be informed in advance and, where appropriate, your consent will be requested and the purposes of the communication and the identity of the third party to whom the data will be communicated will be specified.

This is with the exception of cases in which a legal requirement makes it necessary to communicate such data to a third party.

4. Rights

Individuals who provide us with their data have the following rights in relation to their data:

- a. Right of access
- b. Right of rectification or erasure

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- c. Right to restriction of processing
 - d. Right to portability
 - e. Right to object
 - f. Right to withdraw consent
- a. **Right of access:** Any person has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him/her are being processed and, if so, the right of access to the personal data.
- b. **Right of rectification:** This is the right to obtain the rectification of personal data held by us concerning you.
- c. **Right of erasure:** This is the right to obtain the erasure of your personal data.
- d. **Right to restriction of processing:** This is the right for your data to cease to be subject to the relevant processing operations when any of the following conditions are met:
- When you have exercised your rights of rectification or opposition and the Data Controller is in the process of determining whether the request is admissible.
 - If the data processing is unlawful, which implies the erasure of the data, but you do not want your data to be erased by the Data Controller.
 - When the data are no longer necessary for processing, this means that the data are deleted, but you wish the data controller to limit the processing of the data and to keep them for the purpose of making, exercising or defending claims.
- e. **Right to portability:** This is the right to obtain from the Data Controller, in the event of automated processing of your data, a copy of your data in a structured, commonly used and machine-readable format or to have this copy transmitted directly to the Data Controller indicated by you. Please note that this right does not apply to:
- The data of third parties that you have provided to the Data Controller.
 - The data which is its responsibility, but which has been provided to the Data Controller by third parties.

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- f. **Right to object:** This is the right to object to the processing of your personal data. As far as the processing carried out by the Data Controller is concerned, you may object to the sending of commercial communications, both our own and those of third parties.

If you would like more information about your rights, we suggest that you visit the website of the Spanish Data Protection Agency, as well as the European Data Protection Regulation.

These rights may be exercised by sending an email to hello@hotelverse.tech, clearly indicating which right you wish to exercise and providing a copy of your identity document to prove your identification. They may also be sent by post to the registered office of the Data Controller, which appears in point 1 of this Privacy Policy.

Additionally, we inform you about the possibility of filing a complaint with the competent Control Authority, in this case, the Spanish Data Protection Agency, especially in the event that you have not obtained satisfaction in the exercise of your rights. You can contact the Spanish Data Protection Agency by telephone on 901 100 099 and 912 663 517 or by visiting them at their address C/ Jorge Juan, 6. 28001 - Madrid.

5. Security measures

The Controller guarantees the user that the processing carried out complies with all the provisions of the aforementioned data protection regulations, GDPR and LOPDGDD, and that the data are processed lawfully, fairly and transparently in relation to the data subject and are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Likewise, the Controller guarantees that it has implemented appropriate technical and organisational policies to apply the security measures established by the GDPR and the LOPDGDD in order to protect the rights and freedoms of USERS and has provided them with the appropriate information so that they can exercise them.

6. Origin and veracity of the data

All of the data collected comes from the interested party. The User, by accepting this Privacy Policy, declares and undertakes to guarantee the truthfulness and accuracy of the data provided, as well as being the legitimate owner of the same.

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Likewise, the User undertakes to keep his/her data updated at all times, and to notify the Controller without delay of any significant modification, such as the change of ownership of his/her bank account, or the modification of his/her e-mail account provided through the relevant forms hosted on the website.

In this sense, the User shall be solely responsible for the failure to comply with the above, exonerating HOTELVERSE from any liability with respect to such data that the User has not previously communicated to HOTELVERSE.

DATA COLLECTION CLAUSES

1. Contact form

HOTELVERSE TECHNOLOGIES, S.L. is responsible for the collection and processing of your data for the purpose of managing your query. The legal basis for this treatment resides in the consent of the interested party, as well as in the legitimate interest of the Responsible. In general, your data will not be passed on to third parties. We remind you that, in any case, you have the right to access, rectify and delete your personal data, as well as other rights, as explained in our privacy policy.

2. General clause for emails

This message and its attachments may contain confidential information and may not be communicated, reproduced or distributed. If you are not the final recipient, please delete it and inform us in this way.

Your personal data will be processed under the responsibility of HOTELVERSE TECHNOLOGIES, S.L., in order to resolve your query. They will be kept as long as there is a mutual interest in doing so. You can exercise your rights of access, rectification, portability, deletion, limitation and opposition by sending a message to the following e-mail address hello@hotelverse.tech. You can find more information in our Privacy Policy.

3. Customer / User account login form

HOTELVERSE TECHNOLOGIES, S.L. is responsible for the collection and processing of your data in order to manage the subscription to your customer or user account. The legal basis for this processing is the consent of the interested party. There are no plans to transfer your data to third

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parties. We remind you that, in any case, you have the right to access, rectify and delete your personal data, as well as other rights, as explained in our privacy policy.

4. Newsletter subscription form

HOTELVERSE TECHNOLOGIES, S.L. is responsible for the collection and processing of your data in order to send you commercial communications with news or offers about our services, which we believe may be of interest to you. The legal basis for this processing is the consent of the interested party. There are no plans to transfer your data to third parties. We remind you that, in any case, you have the right to access, rectify and delete your personal data, as well as other rights, as explained in our privacy policy.

I want to receive the newsletter.

5. Form for the publication of comments on the website

HOTELVERSE TECHNOLOGIES, S.L. is responsible for the collection and processing of your data in order to manage the publication of your comment or opinion in relation to the contracted service and your experience. The legal basis for this processing is the consent of the interested party. There are no plans to pass on your data to third parties. We remind you that, in any case, you have the right to access, rectify and delete your personal data, as well as other rights, as explained in our privacy policy.