

PRIVACY POLICY

1. IDENTIFICATION OF THE CONTROLLER.

- Identity: Gran Hotel Ercilla, S.A.
- Address: c/Ercilla, 37-39; 48011 - Bilbao
- Tax ID: A48060149
- Data Protection Officer (DPO): you may contact with our DPO by the following email address: dpd@ercillahoteles.com

2. INFORMATION AND CONSENT.

By accepting this Privacy Policy users are informed and they facilitate their free, informed, specific and unambiguous consent for the personal data they provide on the website www.hotelercilla.com (hereinafter the Website) to be processed by Gran Hotel Ercilla, with their browsing data and any other data they provide to Gran Hotel Ercilla in the future.

3. REQUIREMENT TO PROVIDE DATA.

Requested data in the forms of the Website are generally mandatory in order to comply with the established purposes (unless the opposite is specified in the required field).

Therefore, if these data are not provided, or are provided in an incorrect manner, the established purposes can not be served, without prejudice to the fact that the users can freely view the content of the Website.

4. PURPOSES FOR THE PROCESSING OF SUBJECTS' DATA.

Personal data provided by data subjects through the Website will be processed according to the following purposes:

- Data provided for **making reservations, through the Website and the contact center for individual, groups and room bookings:**
 - ✓ Managing booking requests made by users.
 - ✓ Sending confirmation or documentation for booking arranged.
 - ✓ If consent has been facilitated, sending commercial communications on behalf of Gran Hotel Ercilla.
 - ✓ Analyzing the use of the Website and checking users preferences and behavior.
- Data provided for **changing or cancelling reservations:**
 - ✓ Managing the requests to change or cancel your the made to Gran Hotel Ercilla by the user.
 - ✓ Responding to requests made to Gran Hotel Ercilla.
 - ✓ Analyzing the use of the Website and checking user preferences and behavior.
- For **complying legal, accounting, finance and/or tax requirements.**

The Controller does not market, sale or perform any similar activity, only process personal data for the purposes previously indicated and for the use of Gran Hotel Ercilla.

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5. WHAT SUBJECT'S DATA WILL GRAN HOTEL ERCILLA PROCESS?

Gran Hotel Ercilla will process the following categories of personal data:

- ✓ ID data: name, surname, nationality, ID card number.
- ✓ Contact data: email address, telephone number.
- ✓ Transaction data: acquired or interested products and services.
- ✓ Lodging preferences.
- ✓ Financial, economic and/or insurance data.
- ✓ Other data: any other data provided in the form or call, by the data subject.
- ✓ Browsing data.

If the user provides the hotel with any information or data about other people, he/she claims to have the consent and agrees to transfer the information contained in the Privacy Policy, exempting the hotel from any responsibility in this regard. However, the hotel may perform periodic checks about this issue, adopting due diligence measures in accordance with the current framework of data protection laws/regulation.

6. LAWFULNESS OF PROCESSING PERSONAL DATA:

Lawfulness for processing personal data is based on:

- Data provided for **making reservations, through website and the contact center for individual, group and room bookings**, performance of the contract between the parties.
- For analyzing the use of the Website, the legitimate interest of Gran Hotel Ercilla.
- For **changes and/or cancellation of your reservation**: the performance of the contract between the parties.
- For **complying legal, accounting, finance and/or tax requirements**, the performance of the contract between the parties and laws and regulations currently approved.

Consents obtained for previously mentioned purposes are independent, so the user may revoke only one of them, not affecting other provided consents.

7. SHARE OF DATA WITH OTHER PARTIES.

Subjects' data may be communicated to:

- Third parties to which Gran Hotel Ercilla is obliged to transfer information, such as public authorities, in order to comply with legal or regulatory requirements.
- Companies integrated or adhered to the hotel, all of them dedicated to the hotel sector and similar activities, which will need to get access to those data for the correct provision of the selected services.

Additionally, data may be accessible for hotel providers. This access is necessary for the adequate compliance with legal obligations and/or the purposes previously indicated. The providers will not process these data for own purposes.

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8. DATA STORAGE.

Data will be stored for the duration of contract relationship (booking and billing management processes) and during limitation period of time for legal actions that may arise from it.

9. USERS LIABILITY.

The user:

- Guarantees he/she is over eighteen (18) years old and the information he/she provided is true, accurate, complete and up-to-date. For these purposes, the user is responsible for the accuracy of all data communicated and he/she will keep the information provided in a timely manner, in order to demonstrate his/her current situation.
- Guarantees that he/she has informed third parties of those who provide the data, if any, of the aspects contained in this Policy. He/she also guarantees that he/she has obtained the authorization to provide the data for the purposes previously indicated.
- Will be responsible for fake or inaccurate informations provided through this Website and for the potential damages and prejudices, direct or indirect, to the hotel or third parties.

10. RIGHTS OF THE DATA SUBJECT.

In order to exercise the following rights, data subject may send a letter to the Gran Hotel Ercilla, through the address referred at the point 1 of this Policy, or through the email address: dpd@ercillahoteles.com. You have to send a copy of the ID card with the communication.

- Right to access to the processed data by the hotel.
- Right to rectification any mistake or error in the processed data.
- Right to erasure ("right to be forgotten").
- Right to restriction of processing.
- Right to data portability.
- Right to object.
- Right to be in contact with the hotel's Data Protection Officer by the following email address: dpd@ercillahoteles.com

If you consider Gran Hotel Ercilla has not respected the rights you have recognised by the law in regard with your personal data, we inform you that you have the right to lodge complaint directly to the Spanish Supervisory Authority (Agencia Española de Protección de Datos- AEPD): c/Jorge Juan, nº6; 28001 – Madrid.

11. SECURITY MEASURES.

Gran Hotel Ercilla process user's data in an absolutely confidential manner and keeps the mandatory duty of secrecy regarding them, in accordance with the provisions of the applicable regulations. The hotel has adopted organizational and technical measures in order to guarantee the security of the data and to avoid its alteration, loss or unauthorized processing / access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed.

Last update: april 2019