

WEBSITE PRIVACY POLICY

I. Content and acceptance

The purpose of this Personal Data Processing document is to inform about the way in which personal data collected through the Web Site is collected, processed and protected, so that Users may freely and voluntarily determine whether they wish to provide their personal data through this Web Site.

The access and use of the Website implies full acceptance by the User of this document of Personal Data Treatment and is obliged to comply fully with the terms and conditions contained therein. Therefore, the User must carefully read the present Personal Data Treatment document each time he/she intends to use the Website, as it may undergo modifications.

The present document of Personal Data Treatment will be valid only for the personal data obtained in the Web Site, not being applicable for that information collected by third parties in other web pages, even if these are linked by the Web Site.

2. The identity of the person responsible for the processing of personal data

In compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (GDPR), hereby informs the User that the data collected through the Website and/or any data collection forms on the Website will be incorporated into the personal data files owned by the Company, with registered office at Calle de Princesa, 40, 28008, to manage the User's browsing through the Website, if applicable; as well as for the purposes indicated in each of the forms included in the Website.

The Company guarantees the confidentiality of the personal data provided and compliance with all applicable regulations to that effect.

So that the information provided is always updated and does not contain errors, the User must communicate, as soon as possible, the modifications and rectifications of their personal data as they occur.

Likewise, by clicking on the "Send" button (or equivalent) incorporated in the aforementioned forms, the User declares that the information and data provided therein are accurate and truthful.

The Company informs the Users that it is responsible for the processing carried out on this Website, unless otherwise specifically determined for this purpose in the treatment in question.

By means of this Privacy Policy, the Company informs the Users of the Website, describes what data it collects, how it uses them and the Users' options in relation to such data, including how to access and update them.

The User expressly and fully accepts the conditions stated in this Privacy Policy for the use of the Company's Website and any of the Services incorporated therein.

3.The Data Protection Officer (DPD)

The Data Protection Officer (DPD or DPO) is responsible for ensuring compliance with the data protection regulations to which the Company, and consequently this Website, is subject. The User may contact the DPD designated by the data controller using the following contact details: hotel@princesaplaza.com.

4. Legal basis for the processing of personal data

The legal basis for the processing of personal data is the consent of the data subject. The Company undertakes to obtain the express and verifiable consent of the User for the processing of his/her personal data, for one or more specific purposes.

When a User completes any of the forms with the personal data requested, under the GDPR, he/she must give an unequivocal and explicit consent, revocable, and without retroactive effects.

The User shall have the right to withdraw his/her consent at any time. It will be as easy to withdraw consent as to give it. As a general rule, the withdrawal of consent will not condition the use of the Website.

In the occasions in which the User must provide their data through forms to make inquiries, request information or for reasons related to the Content of the Website, you will be informed if the completion of any of them is mandatory because they are essential for the proper conduct of the operation performed.

5.- The collection of data and the duty to inform

The purpose of this document is to establish and regulate the rules of use, as well as the safeguarding of the data of the Website <https://princesaplaza.com> (hereinafter, the "Website"), understanding by Website all the pages and Content owned by the Company.

Likewise, the Company, owner of the Website <https://princesaplaza.com>, informs the Users of the Website that it is responsible for the processing carried out on this Website, unless otherwise stated in the processing in question.

The Company respects the current legislation on the protection of personal data, the privacy of Users and the secrecy and security of personal data, in accordance with the provisions of the applicable legislation on data protection, in particular, Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, and Organic Law 3/2018, of December 5 on the Protection of Personal Data and guarantee of digital rights, adopting for this purpose the necessary technical and organizational measures to prevent the loss, misuse, alteration, unauthorized access and theft of the personal data provided, given the state of technology, the nature of the data and the risks to which they are exposed.

In particular, Users of the Website are informed that their personal data may only be obtained for processing when they are adequate, relevant and not excessive in relation to the scope and specific, explicit and legitimate purposes for which they were obtained.

The User shall be solely responsible for the completion of the information with false, inaccurate, incomplete or outdated data.

The Company is not responsible for the processing of personal data on the Website to which the User may access through the various links contained in our website.

The User guarantees that the Personal Data provided is true, accurate, complete and up to date and undertakes to notify any change or modification thereof. In the event that Personal Data of third parties is provided, the User is responsible for having informed and obtained the consent of the third parties to be provided, for the purposes indicated in the corresponding sections of this Privacy Policy.

In the event of any loss or damage caused to the Website or to the person responsible for it or to any other third party, through the communication of erroneous, inaccurate or incomplete information, through the forms inserted

in the Website and specifically through the section relating to Registration, the responsibilities arising from such act shall be imputed exclusively to the User.

6. Principles applicable to the processing of personal data.

The processing of the User's personal data shall be subject to the following principles set forth in Article 5 of the RGPD, which are as follows:

- a). Principle of lawfulness, fairness and transparency: the consent of the User will be required at all times after fully transparent information of the purposes for which the personal data is collected.
- b). Principle of purpose limitation: the personal data collected will be for specific, explicit and legitimate purposes.
- c). Principle of data minimization: the personal data collected will be only those strictly necessary in relation to the purposes for which they are processed.
- d). Principle of accuracy of personal data: such data must be accurate and always up to date.
- e). Principle of limitation of the storage period: personal data shall only be kept in such a way as to allow the identification of the User for the time necessary for the purposes of their processing.
- f). Principle of integrity and confidentiality: personal data will be treated in such a way as to ensure their security and confidentiality.

7. Categories of personal data

The Company may collect personal data information from Users, which may vary due to technological facilities, or nature of the Service, among others.

The categories of data that are processed by the Company through this Website are only identification data and management of this, in no case, special categories of personal data in the sense provided in Article 9 of the RGPD are treated.

8. Purposes of the treatment

The personal data are collected and managed by the Company in order to facilitate, expedite, and fulfill the commitments established between the Website and the User, or the maintenance of the relationship established in

the forms that the latter fills out, or, where appropriate, to respond to a request or inquiry.

Likewise, the data may be used for the commercial purpose of personalization, operational and statistical and activities of the corporate purpose of the Company, as well as for the extraction, storage of data and marketing studies to adapt the Content offered to the User, as well as to improve the quality, operation, and navigation through the Website.

The data requested are appropriate and necessary for the purpose for which they are collected, will not be used for a purpose other than that for which they have been granted, and in no case will be disclosed to third parties without the consent of the owner.

The User is not obliged to provide his personal data, however, they are absolutely necessary to be able to carry out the Services that the Company offers.

At the time the personal data is obtained, the User will be informed about the specific purpose or purposes of the processing for which the personal data will be used; that is, the use or uses that will be given to the information collected.

Under no circumstances will the following actions be carried out in relation to the personal data provided by Users:

- International transfers to other States, without seeking prior consent from the data subject.
- It will not rent or sell personal information, or share your personal information with any advertiser or ad networks for advertising without explicit permission.
- No transfer of data to third parties, both natural and legal persons, without obtaining the prior consent of the data subject.

Unless specifically stated otherwise, it will be considered necessary to fill in all the fields of each form, for which the User will have to provide true, accurate, complete and updated data.

The User expressly declares that the data provided through the forms on the Website are true, accurate, and that he himself has sufficient capacity to be able to dispose in relation to them.

Therefore, the User will be solely responsible for any damage or harm, direct or indirect, caused to the Company or any third party, for completing the forms with false, inaccurate, incomplete, outdated or third party data.

The Company reserves the right to decide whether or not to include the personal data of such persons in its files.

The User who makes a false declaration of data, impersonates third parties, or carries out any other illegal action similar to the above may be prosecuted.

9. Retention periods of personal data

Personal data will only be retained for the minimum time necessary for the purposes of their processing and, in any case, only for the period corresponding to the statute of limitations of the actions of the underlying legal business from which the personal data being processed is obtained.

The time of conservation of the Users' personal data is subject to the criterion of the statute of limitations of the actions deriving from the underlying legal business, from which the data of the Users that are the object of processing have been obtained.

10. Personal data of minors

In compliance with the provisions of Articles 8 of the RGPD and 13 of the RDLOPD, only those over 14 years of age may give their consent to the processing of their personal data in a lawful manner by the Company.

In the case of a minor under 14 years of age, the consent of the parents or guardians will be required for the processing, and this will only be granted lawfully in those cases in which they have given their consent. To this end, they may send a communication to the e-mail address hotel@princesaplaza.com.

Notwithstanding the above, and in general, the Company will not process personal information, with reliable knowledge, of minors under 14 years of age.

In the event that the Company, carrying out any control activity, discovers the involuntary collection of information regarding minors under 14 years of age, it will carry out all the necessary measures that, as a provider and host of Contents, it is obliged to undertake and thus be able to delete such information as soon as possible, except in those cases that, due to applicable legislation, it is necessary to keep or with the consent of the parents, guardians or legal representative of the minor, as indicated above.

11. Secrecy and confidentiality of personal data.

The data collected in all private communications between the Company and the Users will be treated with absolute confidentiality, committing the Company to the obligation of secrecy of personal data, its duty to keep them and take all necessary measures to prevent alteration, loss and unauthorized

access or treatment, in accordance with the new European regulations on the protection of personal data, the applicable legislation for the collection and processing of personal data is as follows, being applicable the Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (RGPD), the Organic Law 3/2018 of 5 December on the Protection of Personal Data, and guarantee of digital rights, and its implementing regulations.

In addition, information of any kind that the parties exchange with each other, that which they agree to be of such nature, or that which simply concerns the content of such information, shall also have the status of confidential.

The visualization of data through the Internet shall not imply direct access to the same, except with the express consent of the owner for each occasion. The Company shall not be liable for any possible leakage of information that may occur due to mismanagement of the information by the User.

Likewise, the Company guarantees the User the fulfillment of the duty of professional secrecy with respect to the User's personal data and the duty to keep them. The User may access the Website's Privacy Policy at any time, as well as configure his/her profile to guarantee his/her privacy.

The User is advised not to provide any third party with his/her identification, password or reference numbers that the Company may provide. Also, to ensure that the protection of professional secrecy between the Company and the User is preserved in all communications, the User should not disclose confidential information to third parties.

12. Integrity and security of personal data

The Company undertakes to adopt the necessary technical and organizational measures, according to the level of security appropriate to the risk of the data collected, so as to ensure the security of personal data and prevent the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or unauthorized communication or access to such data.

However, because the Company cannot guarantee the impregnability of the Internet, nor the total absence of hackers or others who fraudulently access personal data, the data controller undertakes to communicate to the User without undue delay, when a breach of security of personal data occurs, which is likely to involve a high risk to the rights and freedoms of natural persons.

Following the provisions of Article 4 of the GDPR, a breach of security of personal data means any breach of security resulting in the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or

otherwise processed, or the unauthorized communication or access of such data.

Personal data will be treated as confidential by the data controller, who undertakes to inform and ensure by means of a legal or contractual obligation that such confidentiality is respected by its employees, associates, and any other person to whom the information is made accessible.

The Company respects the current legislation on the protection of personal data, the privacy of Users and the secrecy and security of personal data, in accordance with the provisions of the applicable legislation on data protection, specifically Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016, and Organic Law 3/2018 of 5 December on the Protection of Personal Data, and guarantee of digital rights, adopting for this purpose the necessary technical and organizational measures to prevent the loss, misuse, alteration, unauthorized access and theft of the personal data provided, taking into account the state of technology, the nature of the data and the risks to which it is exposed, whether from human action or from the physical or natural environment and that it will only record personal data in files that meet the conditions determined in the aforementioned Regulation with respect to their integrity and security and those of the processing centers, premises, equipment, systems and programs.

13. Rights arising from the processing of personal data.

The User may exercise against the data controller the following rights recognized in the RGPD and in the Organic Law 3/2018, of December 5, 2018 on the Protection of Personal Data, and guarantee of digital rights:

a). Right of access: this is the User's right to obtain confirmation of whether the Company is processing his/her personal data, and, if so, to obtain information about his/her specific personal data and the processing that the Company has carried out, carries out, as well as, among others, the information available on the origin of such data and the recipients of the communications made or planned for such data.

b). Right of rectification: this is the User's right to have his or her personal data modified if it proves to be inaccurate or, taking into account the purposes of the processing, incomplete.

c). Right of erasure ("the right to be forgotten"): is the User's right, unless otherwise provided for by the legislation in force, to obtain the deletion of his/her personal data when they are no longer necessary for the purposes for which they were collected or processed; the User has withdrawn his/her

consent to the processing, and the processing has no other legal basis; the User objects to the processing and there is no other legitimate reason to continue the processing; the personal data have been processed unlawfully; the personal data must be deleted in compliance with a legal obligation; or the personal data have been obtained as a result of a direct offer of the Information Company's Services to a child under the age of 14. In addition, the technology available and the cost of its implementation, shall take reasonable steps to inform the controllers who are processing the personal data of the data subject's request for the deletion of any link to such personal data.

d). Right to limitation of processing: this is the User's right to limit the processing of his or her personal data. The User has the right to obtain the limitation of the processing when he/she contests the inaccuracy of his/her personal data; the processing is unlawful; the controller no longer needs the personal data, but the User needs it to make claims; and when the User has objected to the processing.

e). Right to data portability: in case the processing is carried out by automated means, the User shall have the right to receive from the controller his/her personal data in a structured, commonly used, machine-readable format, and to transmit it to another controller. Whenever technically possible, the data controller shall transmit the data directly to such other controller.

f). Right of opposition: this is the User's right not to have his or her personal data processed.

g). Right not to be subject to a decision based solely on automated processing, including profiling: this is the User's right not to be subject to an individualized decision based solely on automated processing of his or her personal data, including profiling, unless otherwise provided for by the legislation in force.

Thus, the User may exercise his/her rights by means of a communication addressed to the DPD/DPO of the data controller at the e-mail address: dpo@36Ocora.com, in which the User must specify the following data:

- Name, surname of the User and copy of the ID card. In the cases in which the representation is admitted it will also be necessary the identification by the person who represents the User, as well as the document accrediting the indicated representation. The photocopy of the DNI may be substituted by any other means valid in law that accredits the entity.
- Request with the specific reasons for the request or information to be accessed.
- Address or e-mail address for notification purposes.
- Date and signature of the applicant.

- Any document that accredits the request being formulated.

This request, and any other attached documents, should be sent to the following address and/or e-mail address:

Postal address: Hotel Princesa Plaza. Calle de Princesa 40, 28008.

E-mail: hotel@princesaplaza.com

14. Transfer of data

The Company will not communicate the User's personal data to third party companies without obtaining prior consent, unless the transfer of data is necessary for the maintenance of the relationship with the User, in which case the User will be previously informed of the aforementioned transfer.

In any case, when the transfer is not necessary for the maintenance of the relationship with the User, in the data collection forms the Company will inform the User of the purpose of the processing and the identity or sectors of activity of the possible assignees of the personal data, previously offering the User the possibility of accepting or not the transfer, depending on the purpose.

15. Commercial communications

The purpose of the processing of personal data is to be able to send electronic communications with information that the Company may consider of interest or relevant to Users.

The User is informed that through the data collection forms, the Company may request his/her consent to send him/her commercial communications.

If consent is given, through the box that will appear on the data collection forms, as shown below:

The Company could contact the User by ordinary mail, email, SMS, WhatsApp or any other equivalent means of electronic communication, to send him/her communications about its services or; where appropriate; to send him/her communications about Services of third parties identified, or belonging to the sectors indicated, in the corresponding box.

Likewise, the Company may send communications through social networks such as Facebook, Twitter, Instagram, among others of similar characteristics.

Any communication made on the basis of the above described will be sent only and exclusively to Users who have accepted the remission of these,

through the box inserted for this purpose and that, therefore, it is understood that the User has given his consent expressly.

In any case, the User is not obliged to receive the aforementioned information, either by ticking or not ticking, as the case may be, the corresponding boxes on the form, or by subsequent communication. If at a certain moment the User does not wish to continue receiving communications of this nature, he/she will be able to revoke his/her consent requesting the cancellation of the Service by sending a communication to the following address hotel@princesaplaza.com providing a copy of a document that allows to prove his/her identity, or by using the link enabled to that effect in the commercial communications that he/she receives.

16.- Hosting of data

For technical reasons and quality of services, the website <https://princesaplaza.com> is hosted on servers within the European Union.

17 .- Availability of data

The availability of data on the Internet may be limited by many external factors which cannot be controlled or foreseen, the Company shall not be liable for any damages or losses that these may cause trying to provide the Services by alternative means to the Internet.

The Company will maintain the highest security standards to ensure confidentiality, integrity and availability.

18. Claims before the control authority.

In the event that the User considers that there is a problem or infringement of the regulations in force in the way in which his personal data are being processed, he will have the right to effective judicial protection and to file a claim before a supervisory authority, in particular, in the state in which he has his habitual residence, place of work or place of the alleged infringement in the case of Spain the supervisory authority is the Spanish Data Protection Agency (<http://www.aepd.es>).

19. Acceptance and changes in this Privacy Policy.

It is necessary that the User has read and agrees with the conditions on the protection of personal data contained in this Privacy Policy, as well as that makes the processing of your personal data so that the controller can proceed in the same manner, during the periods and for the purposes indicated.

The use of the website will imply the acceptance of the privacy policy of the website.

The Company reserves the right to modify its Privacy Policy, according to its own criteria, or motivated by a legislative, jurisprudential or doctrinal change of the supervisory authority (Spanish Data Protection Agency).

Changes or updates to this Privacy Policy will be explicitly notified to the User.

This Privacy Policy is adapted to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data (GDPR) and to Organic Law 3/2018 of 5 December on the Protection of Personal Data, and guarantee of digital rights.

This privacy policy will come into force on 1st day December of 2021.