



Privacy Policy (<https://www.h-santos.es/>)



In accordance with the obligations established in:

- Regulation (EU) 2016/679 of the European Parliament and Council of the 27th of April 2016 regarding protection of natural persons regarding the processing of personal data and the free circulation of this data
- Organic Law 3/2018 of the 5th of December on Personal Data Protection and Guarantee of Digital Rights (LOPD-GDD)

Creation date: March 2019

Review date v1: 5th of March 2021 (and modification 10/03/2021)

Strictly private and confidential. Exclusively for the use of the recipient.



Instructions:

- *This Privacy Policy is intended for the collection of personal data on the corporate website of the company (<https://www.h-santos.es/>).*
- *We recommend that it is included in an adequate and permanently visible place on the website, accessible for the user (we recommend the footer of the website).*
- *The section indicated in red must be reviewed by H. SANTOS D., S.L. and may be deleted if it is not applicable.*
- *After the website form for collecting personal data, a checkbox must be implemented for the user to mark that they have read and expressly accept the privacy policy (data protection policy or similar) as follows, or similar:*

I have read and understood and accept the privacy policy

- *By selecting "privacy policy" the user must be directed to a link with the text of this document.*
- *Commercial communications: To obtain the express consent of the user regarding commercial communications, another checkbox must be implemented after each website form for collecting data, for the interested party to mark that they authorise the sending of such communications. The text may be similar to the following:*

Check this box if you wish us to send you personalised commercial communications on services, offers and promotions related with the sector which may be of interest to you.

- *Reminder: the checkboxes must not be pre-checked, but must be checked by the user. H. SANTOS D., S.L. must preserve evidence of this consent.*

The information to include in the "privacy policy" link is as follows:



PRIVACY POLICY

In accordance with current European and Spanish legislation on personal data protection, and specifically, in accordance with Regulation (EU) 2016/679 of the European Parliament and Council of the 27th of April 2016 (GDPR), Organic Law 3/2018 of the 5th of December on Personal Data Protection and Guarantee of Digital Rights regarding the Protection of Natural Persons (LOPDGDD) and Law 34/2002 of the 11th of July on Information Society Services and Electronic Commerce (LSSICE), below we provide information on the processing of personal data carried out by H. SANTOS D., S.L. This Company will act in accordance with this current legislation in order to guarantee the fundamental right of data protection at all times.

“Personal data” refers to all information on an identified or identifiable natural person (the interested party). So that we can keep your personal data up to date, it is important that you always inform us if there has been any modification to it, otherwise we will not be liable for its veracity. Likewise, you certify that all data you provide us is true, current and relevant to the purpose for which we have requested it, and that you are providing them for yourself.

This privacy policy will apply to all personal data that we process on our clients and users, regardless of the means used by the interested party to interact with us. H. SANTOS D., S.L. informs you that you are in no case obligated to provide us your personal data, and that this data is appropriate, relevant and strictly necessary for fulfilling the purpose for which it is collected; nevertheless, this data is essential for providing the services offered. We remind you that in the case of the data provided belonging to a third party, you guarantee that you have informed this third party of the aspects contained in this Policy and have obtained their authorisation to provide their data to H. SANTOS D., S.L.

1. DATA CONTROLLER OF THE PERSONAL DATA

The data controller of the personal data of our clients and users is H. SANTOS D., S.L., an entity dedicated to providing hotel and restaurant services at a national level, with CIF tax number B02826881 and registered office at C/ Juan Bravo, 8 28006 – Madrid. The data controller acts under the commercial name Hoteles Santos.

We inform you that the contact email address for issues related with data protection is: protecciondedatos@hsantos.es

2. PURPOSE OF THE PROCESSING AND CATEGORIES OF DATA PROCESSED

Hoteles Santos will use your personal data (whether obtained in person or remotely), among other purposes, for the management of reservations, management of requests and consultations, sending of commercial communications, sending of client satisfaction questionnaires, as well as for managing the services subscribed to. The type of personal data that we process on you will vary depending on your relationship with us. Below we provide detailed information regarding this aspect:

PURPOSE	DETAILED INFORMATION	TYPE OF DATA
Management of reservations and execution of the contract	<p>We will process your personal data to be able to manage the reservations made, to send you communications arising from it, as well as making modifications and cancellations of reservations, if applicable. Likewise, we will use your data to manage payment for the services provided, to manage complaints and claims which may arise, to guarantee access to the Wi-Fi network of our establishments, to send the quality and client satisfaction survey, as well as to contact you, if necessary, for the proper provision of the service.</p>	<p>At the time of making your reservation, there is obligatory data we need you to provide such as identification data (name and surname, email address, telephone number) and bank data (data of your credit card as a guarantee of the reservation made). Likewise, we will process the additional data you provide voluntarily, whether remotely or in person at our Hotels.</p> <p>We will need to collect your identification data and your bank data to be able to make the charge for the services provided, as well as any charges which may arise from provision of the service.</p>
Management of requests for information received	<p>In case of requesting information from us on any of our services, we will process your personal data which is strictly necessary for managing your application or request.</p>	<p>The data we will need to attend to your query will be your name and surname, email address, telephone number, as well as any other data your provide us for this purpose.</p>
For marketing purposes	<p>If you subscribe to our Newsletter, we will use your data to manage this subscription by sending communications, including commercial communications, which are of interest to you. You may unsubscribe from it at any time.</p>	<p>To send the newsletter we will only need your email address.</p>
To manage the Club Hoteles Santos card	<p>If you subscribe to Club Hoteles Santos, we will use your data to manage this subscription, as well as to send you commercial communications which may be of interest to you.</p>	<p>To subscribe to Club Hoteles Santos we will need you to provide us your identification data, as well as your postal address, email address and login data. For more information, consult the privacy policy in the Conditions of the Club Hoteles Santos card.</p>
Management of employment applications received	<p>The personal data you provide us when completing the registration form, as well as the data contained in the attached files you send us, will be processed to manage the different selection processes that we carry out. You can obtain more information in the HR privacy policy (available in the "HR" section of this website)</p>	<p>To participate in our selection processes, it will be essential for us to process data regarding your identification and personal circumstances such as your name, surname, postal address, contact telephone number, etc., academic and professional data (training, etc.) and employment details (profession, professional history, etc.).</p>
Management and publication of comments on the Hoteles Santos Blog	<p>Your personal data will be processed to manage the publications of comments you wish to leave on our Blog.</p>	<p>To leave a comment on our Blog, it is essential to enter your name, email address and any other data you wish to provide us.</p>
Statistical and web analytics purposes	<p>We will process your data to facilitate browsing on our website and to optimise the website. For more information you can consult our cookie policy.</p>	<p>When browsing the website of each one of our hotels, information will be stored on your browsing habits by our website.</p>



3. LEGITIMACY FOR PROCESSING AND PERSONAL DATA CONSERVATION PERIOD

At Hoteles Santos we have different legal grounds to undertake the processing of your data, depending on our relationship with you. We mainly need to process your data to execute the contract that binds us with you when you make a reservation at our hotel establishments, although there are other reasons which legitimise us for processing your data, such as the consent you grant to us to send you commercial communications or for us to contact you regarding our services. We remind you that in cases where we request your consent to process your personal data, you may freely oppose this processing without this affecting any other contractual, commercial or professional relationship you have with Hoteles Santos. Additionally, you may withdraw the consent given at any time. Below we provide detailed information on the legitimate basis for processing of your data and its conservation period:

PURPOSE	LEGITIMACY	CONSERVATION PERIOD
Management of reservations and execution of the contract	We will process your data based on execution of the contract between the parties, as well as the legitimate interest of Hoteles Santos consisting of guaranteeing the quality of the service provided with regard to sending the questionnaire on quality and client satisfaction.	Your data will be conserved while you have a contractual relationship with us, and once it has ended, for the prescribed period for legal actions which may arise regarding it.
Management of requests for information received	We will process your data based on the consent granted.	Your data will be conserved for the period strictly necessary to manage the request received, as well as the time necessary to attend to potential actions arising from the processing, if applicable.
For marketing purposes	<p>If you have subscribed to our newsletter, we will process your data based on the consent provided.</p> <p>To send personalised commercial communications on offers, services or promotions, we will request your consent.</p> <p>On occasion, we may process the personal data of clients for direct marketing purposes, taking into account the reasonable expectations of the interested parties based on the legitimate interest of Hoteles Santos regarding promotion of the services it provides.</p>	We will conserve your personal data for subscription to our newsletter until you unsubscribe from it. For sending commercial communications, your data will be conserved provided that you do not withdraw the consent provided or oppose the processing of your data for these purposes.
To manage Club Hoteles Santos membership	We will process your data based on the execution of the contract between the parties for management of the service, and based on your consent for the sending of commercial communications.	The personal data provided will be conserved during the contractual relationship, and once it has ended, for the prescribed period for legal actions which may arise regarding it. If the interested party consented to the sending of commercial communications, their personal data will be conserved provided that they do not oppose this processing.
Management of employment applications received	The processing of your data is based on the express consent provided by the interested party, as well as the establishment of pre-contractual measures, if applicable.	Your CV will be conserved during the selection process, and may be kept for a longer period for other potential related applications.
Management and publication of comments on the Hoteles Santos Blog	We will process your data based on your consent when publishing your comments.	Your personal data will be processed provided that you do not withdraw your consent.
Statistical and web analytics purposes	For analysis of use of our website, the legal basis for processing your data will be legitimate interest. With regard to the cookies we use, it will be necessary for you to grant your consent, where applicable. You can find more information in our cookie policy .	We will process your data related with your use of the website, provided that you do not oppose this. You can obtain information regarding the conservation time of the cookies we use in the cookie policy .



4. RECIPIENTS OF YOUR PERSONAL DATA

The personal data provided will be communicated to third parties necessary for providing the requested services, as well as in cases established by legal requirement. In this regard, we inform you that if you stay at one of our Hotels, we will communicate your data to the State Security Forces and Bodies to comply with Organic Law 4/2015 of the 30th of March on Protection of Citizens' Security. Thus, Hoteles Santos may transfer your personal data to the Public Administrations and Agencies required, as well as banking entities with which we work for management of payments.

We inform you that in the case of the client completing a satisfaction survey sent by Hoteles Santos and checking the box to accept their opinion being shared with other travellers, the name provided will be published along with their review on the platform indicated in the specific case.

For reasons of transparency, we inform you that in order to comply with the purposes indicated in section 2, Hoteles Santos allows certain third parties with which it has a contractual relationship to access your personal data with the sole purpose of providing the agreed service.

Hoteles Santos has adopted the technical and organisational measures necessary to guarantee the confidentiality, availability, integrity and resilience of its processing systems and services. We have duly signed the data processing contract with the service providers with access to personal data, following the terms established in the European regulation on data protection. Among others, the main categories of service providers with access to data are the following:

- Financial entities
- Technological service providers
- Online marketing and booking engine service providers
- Providers of services related with management of the quality of the service provided, including undertaking opinion surveys.

The indicated service providers with access to personal data will be obligated by current personal data protection regulations to comply with it in the terms set out by it, the user even having to accept the privacy policy of this provider in some cases.

5. DATA PROTECTION RIGHTS OF THE INTERESTED PARTY

Hoteles Santos guarantees the exercise of data protection rights set out in current regulations on data protection. We remind you that you may withdraw the consent granted for processing of your data at any time.

You may exercise your rights recognised in current legislation: access, requesting to know whether your data is being processed, and how; rectification, requesting that your personal data is modified in case of being incorrect; deletion, requesting the deletion of your personal data (Hoteles Santos may keep this data blocked in case of legal obligation arising); opposition, requesting that we stop processing your personal data, provided that processing your data is based on our legitimate interest; not being subject to automated individual decisions; portability of data, requesting that your data is provided to you in a structured, commonly used, machine readable format, or that this data is transmitted to another data controller, provided that the processing of your data is based on your consent or on contract execution; and limitation of processing, requesting that personal data is not processed in accordance with the corresponding processing of data in each case.

The interested party may exercise their rights by writing to Hoteles Santos (C/ Juan Bravo, 8 28006 Madrid) or by emailing (protecciondedatos@hsantos.es), attaching a copy of a document duly accrediting their identity. In any case, the user has the right to lodge a claim before the Spanish Data Protection Agency (C/ Jorge Juan, 6 28001 – Madrid).



6. OTHER INFORMATION OF INTEREST ON OUR PRIVACY POLICY

Completion of the traveller Registration Sheet. We inform clients staying at our Hotels that in accordance with applicable legislation (Organic Law 4/2015 of the 30th of March on Protection of Citizens' Security), to guarantee fulfilment of functions to prevent criminal offences and actions which may lead to criminal liability in the investigation of terrorism and other serious forms of organised crime that the Security Forces and Bodies are tasked with, and to allow fulfilment of the commitment of adopting the necessary measures on monitoring of travellers using lodging establishments, guests over 16 years of age, whether national or foreign, must certify their identity when checking into our hotel establishments using a valid official document.

Video surveillance cameras. Hoteles Santos has video surveillance cameras installed in all its Hotels, with the purpose of monitoring access to its facilities for security reasons. The images captured by our security cameras will be deleted in the maximum period of 1 month, except in cases where they must be conserved to accredit the acts committed which violate the integrity of individuals, property or installations. These images may be provided to the State Security Forces and Bodies, as well as Courts and Tribunals in the cases set out in legislation.

Modifications to the privacy policy. This Privacy Policy has been updated in March 2021. We will not carry out any processing on the personal data of the interested parties for a purpose other than those for which it was collected. Hoteles Santos reserves the right to modify its Privacy Policy in the case of there being a change to current legislation, jurisprudential doctrine, or due to its own business criteria. In the case of making modifications to our Privacy Policy, the new text will be published at this same address.