

## Privacy Policy

### **A. Data Controller**

Be informed that the personal data you have provided within the framework of our contractual relationship will be processed by ROOM MATE HOSPITALITY & LEISURE, S.L.U. Calle José Abascal 45, 28003, Madrid (hereinafter, the "**Hotel**"), for the purposes described below.

Unless otherwise expressly indicated when the personal data is collected, said data must be provided as they are an essential component for the management, maintenance, and monitoring of our contractual relationship. Not providing said data will render processing your request or providing the service purchased impossible. The personal data will be exclusively collected for the purposes indicated in this Privacy Policy.

You confirm and guarantee the truthfulness and accuracy of the data provided and that they are current. Accordingly, You commit to communicate any modification thereto, pursuant to the procedure set forth in section **E. Data Subject's Rights**.

### **B. Identification of affected information**

To execute the contractual relationship, Room Mate Hospitality & Leisure, S.L.U. will process the information described below:

Stakeholder Groups	Personal information accessible for processing
Guests	First name First surname. Second surname. Sex. Identity card number. Document support number. Type of document (ID card, passport, TIE). Nationality. Date of birth. Home address: <ul style="list-style-type: none"> <li>- Complete address.</li> <li>- City.</li> <li>- Country.</li> </ul> Home telephone. Cell phone. Email Number of travelers. Relationship between the travelers (if any of them is a minor). Identification of the means of payment: card type and number, IBAN bank account, mobile payment solution, other. Image Voice.

### **C. Processing purposes**

You are hereby informed that the Hotel will process your data for the following purposes:

**i. *Based on the contractual relationship:***

- a. Manage the reservation you make through any of the channels enabled for this purpose and process your registration request as a client of the Hotel, as well as the subsequent business relationship with you.
- b. Effectively manage, maintain and control the relationship derived from the contracting of the Hotel's products or services.
- c. Collect payments in the corresponding amounts when the booking is canceled after the deadline, where applicable.
- d. Manage guests' stays, as well as provide the services requested thereby throughout said stay, which includes, inter alia, preparation of the stay and responding to any requests made with regard thereto. For these purposes, we will be able to process data such as the age of underage guests so as to prepare the room with a crib, where necessary, as well as the health data of guests who so require to appropriately manage their stay and prepare appropriate meals. Said purpose also includes billing and collecting payment for the services consumed.

**ii. *Based on a legal obligation:***

- a. Share data with public authorities, regulators, or governmental agencies in the circumstances where required by law, local regulations, or in compliance with regulatory obligations.

**iii. *Based on the legitimate interest of the Hotel:***

- a. Conduct satisfaction surveys regarding the products and/or services you have purchased, in order to assess your satisfaction therewith so as to improve the Hotel's processes and services.
- b. Manage, process, and respond to potential complaints and claims lodged by You.
- c. Record your voice and/or image and save the telephone conversation and/or video when we expressly inform you of this. The legitimate interests of the Hotel are to maintain the quality of its services and use the recordings where necessary to protect its legal standing in the event of any potential disputes.
- d. Share the data with other Room Mate Group companies as a result of the centralization of the administrative and technological processes within the Room Mate Group.

**iv. *Based on the express consent provided by You:***

- a. If you have given your authorization, the Hotel may conduct commercial and/or advertising actions or communications, by any means, including electronic or equivalent communications, related to products or services similar to those contracted with the Hotel.
- a. If you have given your authorization, the Hotel may conduct profiling based on the personal data available to the Hotel in order to know which products and services may best fit your profile, so that it can maximize their performance, thereby offering you the best offers on products and services that may be of interest

to you.

- b. If you have given your authorization, the Hotel will be able to offer you products and services other than those that You purchased via any channel, including electronically, as well as third-party products that you may be interested in, even after the termination of this contractual relationship.
- c. If you have given your authorization, the Hotel will share your personal data, as well as your sales profile, to third-party companies, including the companies in the Room Mate Group, so that they can send commercial communications about their products and services via any channel, including electronically, even after the termination of this contractual relationship. These companies may belong to the following sectors: children's activities and childcare, food services, training and education, publishing, finance and credit, insurance, home, bazaar, health and pharmaceuticals, leisure, mass consumption, automotive, personal care, IT, computers, telecommunications, water, energy and transport, tourism and travel, real estate, toys, textiles, NGOs and products/services for animals and pets.
- d. If you have given your authorization, the Hotel will be able to create a profile based on your consumption habits through internal and external data from public sources (e.g., voter rolls, lists of people belonging to professional groups, and public social media accounts, among others), in order to provide special offers of products or services tailored to your needs, as well as share your data to third parties outside the Room Mate Group that are advertising partners thereof, i.e., companies that allow Room Mate to show you advertising for Room Mate Group products and services, tailored to your preferences when visiting other websites or using different social media sites, even after the termination of this contractual relationship.

**v. *Fulfillment of a public interest mission***

- a. Ensure the security of people, goods and facilities by carrying out video surveillance.

**D. Recipients**

Under the terms described in section **C. *Purposes of Processing***, the Hotel may provide your personal data to the following entities:

- i. Public authorities, regulators, or governmental or jurisdictional agencies in the circumstances where required by law, local regulations, or in compliance with regulatory obligations.
- ii. Third-party entities and companies within the Room Mate Group for the purposes described in letter f) of point iii) Legitimate Interest and in letters b) and c) of point iv) Consent and set out in section **C. *Purposes of Processing*** List of available companies [HERE](#).

In addition to the above data communications, the Hotel collaborates with some third party service providers who have access to your personal data and who process such data in the name and on behalf of the Hotel as a result of the provision of services (the "Data Processors").

The Hotel follows strict service provider selection criteria so as to comply with its obligations with regard to data protection and it undertakes to sign the corresponding data processing contract with these parties. This contract will, inter alia, impose the following obligations: apply the appropriate technical and organizational measures; process personal data for the agreed upon purposes, solely following the instructions provided by the Hotel; and deleting or returning the data to the Hotel once the service has been provided.

Specifically, the Hotel will purchase services from third-party suppliers that work in industries including, but not limited to, the following: logistics, legal counsel, provider certification, professional services companies, maintenance companies, companies providing IT services, security companies, instant messenger companies, and companies providing call center services.

#### **E. Rights of the stakeholder**

Consent provided under the circumstances set out in this document can be revoked by You at any time, with a simple request. We hereby inform you that, pursuant to applicable law, You have the right to exercise your rights to access, rectification, suppression, and opposition, as well as the right to restriction of processing, and the right to data portability, by proving your identity (with a copy of your government-issued ID) and sending written request to the following address: ROOM MATE HOSPITALITY & LEISURE, S.L., Calle José Abascal 45, 28003, Madrid, or at the following email address [dpo@room-mategroup.com](mailto:dpo@room-mategroup.com).

If you believe ROOM MATE HOSPITALITY & LEISURE, S.L.U. has violated any of the aforementioned rights, you will have the right to file a complaint before the competent control authority. However, we recommend that before filing any complaint or claim, you contact us, in particular our Data Protection Officer([dpo@room-mategroup.com](mailto:dpo@room-mategroup.com)), in order to analyze the specific situation and try, if necessary, to find an effective and amicable solution.

#### **F. Retention**

Your personal data will be kept for the duration of the contractual relationship between you and the Hotel.

If images are captured through video surveillance systems, they will be kept for a period of one month, unless they are provided to Security Forces and Corps, or/and Courts and Tribunals.

Once said contractual relationship has ended, your personal data will be deleted after all necessary actions have been carried out to manage and conclude any obligations that may remain between the parties. In this period, all the administrative processes necessary will be performed, except in cases where the sending of commercial communications applies.

Without prejudice to the above, your data will be stored and duly blocked for the duration of any liability arising from the performance of our contractual relationship, as well as compliance with the Hotel's other legal obligations.

In any case, the Hotel guarantees that it shall not process the data unless it is necessary for the formulation, exercise or defense of claims or when it is required to provide the same to the Public Administration, Judges and Courts during the period of limitation of your rights or legal obligations.

#### **G. Security measures**

Taking into account the nature, scope, context and stated purposes of the processing, as well as the risks of varying likelihood and severity to your rights and freedoms, ROOM MATE HOSPITALITY & LEISURE, S.L.U. applies (and shall apply) appropriate technical and organizational measures to ensure appropriate security and protection of your personal data by adhering to privacy criteria by design and by default, as well as applying a concurrent risk approach system that shall be reviewed and updated by ROOM MATE HOSPITALITY & LEISURE, S.L.U. when necessary.

#### **H. International data transfer**

In general, no international transfers of personal data to a third country or international organization outside the European Economic Area are foreseen. Notwithstanding the foregoing, if in the future, the Hotel carries out international data transfers, they will comply with the guarantees established by the General Data Protection Regulation.