

Latest update: November 2018

This privacy policy applies to the My Bahia Principe programme.

Please read it carefully. It contains important information as to the processing of your personal data and the rights you enjoy under the regulations in force in this sphere.

We reserve the right to update our privacy policy at any time as a result of business decisions, and to comply with any possible changes in legislation or court rulings. If you have any queries or require any clarification regarding our Privacy Policy or your rights, you may contact us via the channels indicated below.

### **1. Who is the Data Controller with regard to your data?**

**Data controller:** VIAJES GTI GRUPO TURISTICO INTERNACIONAL S.A. (PIÑERO GROUP)

**Tax ID:** A30350714

**Postal address:** Plaza Mediterráneo 5, Edificio Neptuno, 07014 Palma, Balearic Islands, Spain.

You may contact the Data Protection Representative at the PIÑERO GROUP at [dpd.privacy@grupo-pinero.com](mailto:dpd.privacy@grupo-pinero.com)

### **2. What personal information do we obtain?**

The data used to generate commercial profiles are obtained:

- From any forms that you complete and any requests that you submit to companies of the PIÑERO GROUP;
- The information generated by your activity as an agent;
- Your involvement in commercial campaigns, such as competitions or promotions.

The data categories we process typically comprise:

- Identification and contact data;
- Data on personal characteristics;
- Economic and transactional data: data regarding the record of past bookings processed;
- Data regarding the record of past contact with the group;
- Consolidation of data generated by browsing our websites as a user.

### **3. Why do we set up profiles, and for what purpose do we process these data?**

The data that we collect and the profiles that we create help us to know and better understand the agents that market our products in order to improve their experience, by analysing and improving the quality of our services and customising them, and rewarding their dedication to our products by preparing specific offers tailored to their profile as agents.

We do **NOT** take automated decisions based on the commercial profiles of our customers and users.

### **4. Who can we disclose your data to?**

Your data will be communicated to MANAGEMENT HOTELERO PIÑERO, S.L., domiciled at Plaza Mediterráneo 5, 07014 Palma (Illes Balears), Spain, for the internal administrative purposes of GRUPO PIÑERO, claims management purposes, marketing purposes and commercial consignments at group level, quality and reputation management. All this is based on the legitimate interest of the group in having a consolidated vision of these processes.

### **5. Legal basis for processing**

The creation of commercial profiles, the personalisation of our services and the sending of offers and personalised commercial communications are based on the fulfilment of the contractual relationship that is established when the agent applies to join the My Bahia Principe programme.

## **6. How long do we keep your data?**

Profiles and data processed for commercial purposes are kept active as long as the data subject does not request their deletion and, in any case, for the periods provided for in the applicable legal provisions and for the time necessary to meet possible responsibilities arising from the processing.

## **3. What are your rights?**

You have the right to obtain confirmation of whether we are processing your personal data or not, and in this case to access the data. You may likewise request that your data be corrected if they are inaccurate, or that your data be completed if they are incomplete, and request their erasure if, among other reasons, the data are no longer required for the purposes for which they were gathered.

In certain circumstances, you may request the restriction of the processing of your data. In this case, we will only process the data affected for the formulation, exercise or defence of claims, or with a view to the protection of the rights of other persons.

Under certain conditions, and for reasons connected with your individual situation, you may likewise object to the processing of your data. In this case we will no longer process the data, except for overriding legitimate reasons that would prevail over your interests, rights and freedoms, or for the formulation, exercise or defence of claims.

You may nonetheless at any time revoke your consent and object to the processing of your data for direct marketing purposes, including the generation of commercial profiles. In this case we will no longer process your personal information for said purposes. The withdrawal of your consent will not affect the lawfulness of processing based on consent prior to withdrawal.

Likewise, under certain circumstances you may request the portability of your data, for them to be transferred to another data controller.

You likewise enjoy the right to raise a grievance with the Spanish Data Protection Agency, or any other competent supervisory authority.

To exercise your rights, you should send us a request, enclosing a copy of your national identity document or other valid identity document, by conventional or electronic mail, to the addresses indicated in the section 'Who is the data controller for your data?'

To revoke your consent for the sending of our commercial communications, you need simply send an email to: [baja@bahiaprincipe.com](mailto:baja@bahiaprincipe.com)

Further information about your rights and how to exercise them may be found on the website of the Spanish Data Protection Agency at <http://www.agpd.es>.