# Data protection

As a result of browsing the website and completing its forms, the user accepts that the personal data provided by him or herself or that is provided in the future through such services, are subject to processing by HOTUSA and group companies (including HOTELES TURISTICOS UNIDOS SA, CIF A08452567, HOTUSA HOTELS SA, CIF A60156502 and EUROSTARS HOTEL COMPANY SL, CIF B64930910 and other HOTUSA companies), including the collection of access data and the use of cookies and features provided by third parties.

# Purpose of the data processing, legitimation and recipients of the information

The data is used to:

- Allow the operation of the website and provide access to areas for registered users
- Register and respond to requests made by users through web forms (contact, etc)
- Provision and administration of HOTUSA services, processing of reservations and the payment of products and services through GROUP or related websites, call centers, mobile communication systems based on GSM, GPRS or UMTS technologies; incident management and complaints
- Manage participation in loyalty programs
- Subscription to HOTUSA newsletter, advertising and other commercial promotions by email, SMS, MMS or any other similar means of HOTUSA
- Conducting quality surveys
- Conducting contests
- Application to work at HOTUSA
- Web analytics and statistics
- Include features provided by third parties (Google Maps, etc)

Web browsing and access to areas for registered users

- Purpose: the necessary data for the provision of online services are processed, including the registration of IP addresses, visited pages and access date, as well as information about the user's terminal. The data is also processed for security and web improvement purposes.
- Legitimation: the processing of data is necessary for the provision of online services; consent, expressed through the use of the website
- · Recipients and transfers: companies and establishments of HOTUSA

The delivery of all the data required for registration as a user is mandatory if not specified otherwise in the registration form, and HOTUSA may deny registration to the interested party who does not provide such data.

# Use of web forms

- Purpose: meet the requests made through the web forms.
- Legitimation: consent expressed when using and sending the form.
- Recipients and transfers: companies and establishments of HOTUSA and other companies involved in providing the requested services

Provision of services

- Purpose: to provide services including management of hotel reservations and payment. Send information about HOTUSA's services electronically.
- Legitimation: execution of the contract or provision of the service.
- Recipients and transfers: companies and establishments of HOTUSA and other companies involved in providing the services requested, including the requested hotel establishments

#### Loyalty programs

- Purpose: to participate in the loyalty programs of HOTUSA (Star Traveler, Corporate and others). Send information about HOTUSA's services electronically. Customize business information based on the profile or location.
- Legitimation: execution of the loyalty program; consent
- Recipients and transfers: companies and establishments of HOTUSA

Subscription to the HOTUSA newsletter, advertising and other commercial promotions

- Purpose: to send information about HOTUSA's services, by email, SMS, MMS or any other analogous means
- Legitimation: existence of a prior contractual relationship; consent
- Recipients and transfers: companies and establishments of HOTUSA

#### Quality survey

- Purpose: to know the opinion of the clients and attend to their comments.
- Legitimation: is part of the execution of the contract or service provision.
- Recipients and transfers: companies and establishments of HOTUSA, quality departments

## Contests

- Purpose: to organize contests to promote HOTUSA, its establishments and brands. Communication of the winners and delivery of prizes, if applicable.
- Legitimation: execution of the contest, including the publication of the winning work (for example, photographic and literary competitions) and its author according to the rules of participation.
- Recipients and transfers: companies and establishments of HOTUSA. Web pages, social networks and media where the winners are published.

#### Application to work at HOTUSA

- Purpose: to participate in present and future selection processes of HOTUSA and its establishments, assess the candidate
- Legitimation: consent, essential to hold the status of candidate
- Recipients and transfers: companies and establishments of HOTUSA

## Web Analytics

- Purpose: to know the way in which the web is searched, accessed and used by the public. They may involve the collection of personal data such as the IP address, the location of the connection, information about the navigation software or hardware, etc.
- Legitimation: consent, expressed through the use of the website.
- Recipients and transfers: companies and establishments of HOTUSA

#### Functions provided by third parties

- Purpose: incorporate functions provided by third parties, such as maps, analytics, social buttons, Zendesk chat widget, etc.
- Legitimation: consent, expressed through the use of the website
- Recipients and Transfers: The functions of third parties establish a direct connection between the user's browser and the Internet domains of third parties, allowing the download and execution of the function, including from pages outside the European Economic Area.

This website integrates functions of Google Inc, like Google Analytics and Google Maps. By using this website, the user authorizes the processing of their data by Google in accordance with the terms of its privacy policy: https://policies.google.com/privacy

## Veracity of data

The user must fill in the forms with true, exact, complete and up-to-date. The user will not enter data referring to another person; HOTUSA will presume that the data has been provided by the owner thereof. The user will be solely responsible for any damage or loss, direct or indirect that could cause to any person because of the completion of the form with data relating to another person.

#### Access rights, rectification, erasure, opposition and others

The data subject has at all times the right to access, rectify, and erase the data that concerns him or herself, as well as to oppose the processing of the data, in the terms included in the data protection legislation. He or she also has the right to request: the portability of his or her data, the revocation of the consent given if any and the limitation of the processing.

The owner of the data may exercise these rights by writing to HOTUSA (reference DATA PROTECTION) C / MALLORCA 351 08013 Barcelona (Spain), this communication must include a signed request indicating the action requested and a photocopy of the ID or passport.

The data subject may also oppose the reception of commercial e-mails, just by requesting it by an email sent from the address to unsubscribe and directed to e-marketing@hotusa.com.

If the data subject thinks that the processing of his or her data violates the data protection legislation, he or she can lodge a complaint to the data protection supervisory authorities.

#### Data protection officer

For any question related to the processing of data by HOTUSA, the data subject can contact the data protection officer by sending a letter to:

Data protection officer HOTUSA. C / Mallorca 351, 08013 Barcelona, Spain.

#### Minors of age

The use of HOTUSA's web services is prohibited for persons under 18 years old.

#### Data recipients and international data transfers

The user is informed that, for the provision of products and services offered, HOTUSA must communicate necessarily the personal data of the user to the suppliers of the products and services chosen by the user.

In relation to the services and establishments outside the Economic European Area, the data necessary to subscribe and provide services will be subject to international data transfer, including to countries that do not have data protection legislation comparable to the European legislation.

In relation to GRUPO HOTUSA, companies include among others CITADEL SL, DIANA HOTELERA SA, EUROSTARS HOTEL COMPANY SL, EXE HOTE LS SL, FAMILIA HOTELS SL, HOTELES TURISTICOS UNIDOS SA, HOTELIUS SL, HOTUSA HOTELS SA, IGM WEB SL, KEYTEL SA, MUCHOHOTEL SA, RESTEL SA, ROOMLEADER SL, ROOMTRADE SL, ROSEUS HOTELS SL.

## **Data security**

HOTUSA has one of the safest technologies, as far as the protection of your credit card data is concerned. It also complies with all international standards that legislate the subject. All sections of HOTUSA where we request sensitive information use the SSL communication protocol. This means that the information that travels through the Internet from your computer to our server makes it encrypted, making them indecipherable to any outsider. This technology ensures and guarantees, that your data can not be intercepted, manipulated or impersonated, in any way. This way, payment through Internet is now as safe as direct purchase.

#### What does SSL mean?

SSL (Secure Socket Layer) is a standard Internet security technology. Applies an encryption system (coding) that provides maximum confidentiality of the data transmitted to us. This prevents illegal entry or interception in a system while the data circulates on the Internet. For greater security, this data is stored in a secure server protected by a "firewall" in continuous monitoring.