

# PRIVACY POLICY

LAST UPDATED: 03/06/2021

GUATLLA MARESA, S.L. (hereinafter, "MAS GALL") is committed to respecting the privacy of users and the protection and security of their personal data. For this reason, the user is informed of the way in which MAS GALL collects, processes and protects the personal data provided through its website [www.masgall.com](http://www.masgall.com).

The user must carefully read this privacy policy, which has been written in a clear and simple manner to facilitate its understanding, and freely and voluntarily determine whether they wish to provide their personal data to MAS GALL.

Likewise, the user guarantees that he/she is of legal age and that the data provided are true, accurate, complete and up to date, and shall be liable for any direct or indirect damage or harm that may be caused as a result of failure to comply with this obligation.

## 1. DATA CONTROLLER

GUATLLA MARESA, S.L., with address at Av. Diagonal 458, 8th floor, 08006, Barcelona.

You can contact our MAS GALL at the postal address mentioned above or at the e-mail address [conciERGE@masgall.com](mailto:conciERGE@masgall.com)

## 2. HOW WE COLLECT YOUR DATA

The data that we will process about you for the legitimate purposes explained below are the personal data provided by the user when interacting with the website, or when requesting to use the services offered by MAS GALL (for example: requesting information, contact, making bookings, etc.). As well as any additional data generated as a result of this initial interaction.

## 3. WHAT PERSONAL DATA WE PROCESS ABOUT YOU, WHY WE PROCESS IT, AND FOR WHAT REASONS

MAINTENANCE OF THE COMERCIAL RELATIONSHIP		
TIPO OF DATA	PURPOSES	LEGAL BASES
The data that we will process about you for the legitimate purposes explained below are as follows: <ul style="list-style-type: none"><li>▪ Identification data (name, surname, ID card number),</li><li>▪ Contact details (e-mail, postal address, telephone number),</li><li>▪ Booking dates.</li><li>▪ Data generated during the course of the relationship with MAS GALL.</li></ul>	We process your personal data <u>to manage the commercial relationship</u> (manage your reservation, respond to queries or requests you may have).	The processing of your personal data related to the management of the commercial relationship is legitimate as it is necessary to <u>comply with the contractual or pre-contractual obligations with you</u> , including the conditions set out in the General Terms and Conditions.

COMMERCIAL COMMUNICATIONS		
TYPO OF DATA	PURPOSES	LEGAL BASES
<p>The data that we will process about you for the legitimate purposes explained below are as follows:</p> <ul style="list-style-type: none"> <li>▪ Identification data (name, surname,)</li> <li>▪ Contact details (e-mail)</li> </ul>	<p>We process your data for the purpose of sending, including by electronic means, <u>commercial communications about products or services of a similar nature</u> to those you have contracted or about which you have requested information from us or made a request to MAS GALL.</p> <p>You may object to receiving such communications, now or at any time, by sending an e-mail to the e-mail address of our Data Protection Officer, or by sending a request to our postal address, for the attention of MAS GALL.</p>	<p>The processing of your personal data for the sending of communications about MAS GALL products or services similar to those you have contracted or about which you have requested information from us or have addressed a request to our organisation, responds to a <u>legitimate interest</u> of our entity and is authorised by the regulations in force, in particular by the Law on Information Society Services and Electronic Commerce and resolutions of the Spanish Data Protection Agency.</p> <p>You may contact MAS GALL for further information in relation to this legitimate interest.</p>
COMPLIANCE WITH LEGAL OBLIGATIONS		
TYPO OF DATA	PURPOSES	LEGAL BASES
<p>We process the personal data that you provide us with, and those that are generated during the course of the relationship with MAS GALL.</p>	<p>We process your personal data in order <u>to fulfil our legal obligations</u>. For example, we may disclose your identification data to the relevant law enforcement agencies.</p>	<p>The processing of your personal data is necessary in order <u>to comply with our legal obligations</u>.</p>

#### 4. NECESSITY OF THE DATA REQUESTED

The data marked with an asterisk (\*) on the forms provided by MAS GALL on its website are necessary to comply with the established contractual or legal purpose.

Therefore, if the user does not provide them, MAS GALL will not be able to attend to their request.

#### 5. AUTOMATED DECISIONS

MAS GALL does not take decisions that may affect you based solely on the automated processing of your data.

#### 6. WHEN AND FOR WHAT REASON WE MAY DISCLOSE YOUR DATA TO THIRD PARTIES

Your data may be transferred to the recipients indicated below, for the reasons explained below:

- Public Administrations for compliance with the legal obligations to which MAS GALL is subject due to its activity.
- Third parties when it is necessary to comply with the obligations arising from the contractual relationship with you. (for example, banking institutions, as the case may be).
- Accounting auditing companies: in order to comply with the legal account auditing obligations to which MAS GALL is subject due to its activity.
- Interested third parties and their advisors within the framework of any operation of structural modification of MAS GALL or the contribution or transfer of business or branch of business activity as well as the transfer of the same to the said third party in the event of execution of the operation. Said communication of data shall be carried out under the protection of MAS GALL's legitimate interest consisting of the correct governance of the same.
- Law enforcement agencies: when our organisation is required to provide information in compliance with a legal obligation.
- Suppliers who need access to your data for the provision of services that MAS GALL has contracted from these suppliers, and with whom MAS GALL has signed the confidentiality and personal data processing contracts necessary and required by law to protect your privacy.

If in the future MAS GALL should make other transfers of personal data, it will inform you in due course.

## **7. INTERNATIONAL DATA TRANSFERS**

MAS GALL has contracted the services of technological suppliers located in countries that do not have regulations equivalent to those of Europe ("Third Countries"). These suppliers have signed with MAS GALL the confidentiality and data processing contracts required by the regulations for suppliers located in Third Countries, applying the necessary guarantees and safeguards to preserve their privacy.

In the event that the transfer to interested third parties and their advisors within the framework of any operation of structural modification of MAS GALL or the contribution or transfer of business or branch of business activity as well as the transfer of the same to the said third party in the event of execution of the operation, involves an international transfer of data, this shall be carried out with the safeguards and guarantees provided for in the regulations on the protection of personal data.

For further information on guarantees in relation to international data transfers, you may contact MAS GALL at the postal and e-mail addresses indicated.

## **8. HOW LONG WE WILL KEEP YOUR DATA**

Your personal data will be kept for as long as your relationship with MAS GALL is maintained and, after the termination of this relationship for any reason, during the applicable legal limitation periods. In this case, they will be processed for the sole purpose of accrediting compliance with our legal or contractual obligations. Once these limitation periods have expired, your data will be deleted or, alternatively, anonymised.

## **9. YOUR RIGHTS**

You may exercise your rights of access, rectification, deletion and portability, limitation and/or opposition to the processing, through the postal and e-mail addresses indicated.

Likewise, if you consider that the processing of your personal data violates the regulations or your privacy rights, you may file a complaint:

- To MAS GALL, via the postal and e-mail addresses indicated.
- To the Spanish Data Protection Agency, via its electronic headquarters or postal address.

## **10. MODIFICATION OF THE PRIVACY POLICY**

MAS GALL reserves the right to modify its Privacy Policy, according to its own criteria, or motivated by a change in the doctrine of the Spanish Data Protection Agency, legislation or jurisprudence. In any case, you will be duly informed in the event that the modification entails substantial changes in the way we treat your personal data.