



DATA PRIVACY POLICY

At Esquiades.com we take the privacy of our customers and users very seriously. Therefore, we understand that the treatment of the personal data provided by our customers and users must guarantee the security and integrity of all the data and information obtained through Esquiades.com.

Regarding the statement above, Esquiades.com states that the processing of the personal data of its customers and users will be in accordance with the provisions of the UE Regulation 2016/679 of the European Parliament and of the Council, of April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data and repealing Directive 95/16 / EC (hereinafter, the General Data Protection Regulation) as well as to the provisions of Organic Law 3/2018, of December 5, regarding the Protection of Personal Data and guarantee of digital rights.

We inform you that the fields marked as "obligatory" on our different forms must be completed for the correct development and processing of the requests or queries they may arise.

If the following statements are not taken into account, Esquiades.com reserves the right to update and / or modify this Data Privacy Policy when necessary. In order to the client or user to remain informed of the applicable Privacy Policy, we recommend reading this document carefully, especially, whenever a client decides to contract a reservation.

1.- What is the scope of application of the Privacy Policy?

This Privacy Policy will be extended to all kinds of tourist, commercial and information services that Esquiades.com provides to its clients and users, regardless of the methods or channels used.

In accordance with the foregoing, we indicate that the Privacy Policy set forth in this document is applicable to the company's webpages, mobile applications, newsletters, social networks, registered user accounts, digital communications, communications via SMS or telephone, as well as any other existing means of communication.

2.- Who is responsible for the treatment of customer and user data?

The responsible for the processing of the data is the commercial company VIAJES PARA TI, SLU, with the following registration number B55666952, registered in the Tarragona Business Register, Volume 2903, Book 0, Page 37, Section 8, Sheet T 48873, Entry 1, with

the following registered office: Bellisens Avenue 42, TecnoParc Building. Office 129, 43204 - Reus, Tarragona, Spain.

3.- What kind of information is obtained and stored?

The customer or user who provides the information and personal data described in this Privacy Policy agrees to ensure the accuracy and veracity of the data provided. Also, in case of providing personal data of third parties, the client or user undertakes to obtain the prior consent of the third parties and to inform them of the application and consequences of this Privacy Policy.

The personal data obtained by Esquiades.com will be treated in accordance to the statements which are those listed below:

a) Information regarding a reservation: When a reservation is made, the client must indicate his / her name and surname, ID / Passport, e-mail address, telephone number, payment details, necessary data in order to contract and execute an insurance contract (in your case), the number and name of your companions and, when appropriate, the preferences for your stay and the current account number of the client (if refunds have to be done).

Furthermore, we inform you that when the payment of the reservation is made by credit / debit card, the financial institution that acts as an intermediary in the transaction generates a code associated with the operation and the card with which the payment was made with. This allows the merchant, always with the consent of the customer, to collect the amount or those amounts related to the reservation associated with the sole purpose of granting greater convenience to the payments that the client must make by virtue of modifications, partial payments or other Payments. Your credit card details are not stored in our systems, they are only saved during the necessary period in order to formalise your reservation, once the payment of the reservation is made, the information on your card disappears permanently from our systems.

b) Information regarding opinion surveys: When a user voluntarily responds to the surveys provided after the trip, he / she can indicate data related to his / her opinions about the trip, age of the travellers, gender of the respondent, origin and destination, reasons of the trip, as well as other information related to your travel experience.

c) Creation and maintenance of a registered user account: In order to be able to manage reservations in a faster way, the client will be able to create a user account where his personal configuration will be stored and will allow him to check his previous reservations and manage his future ones. The user must indicate his name, email and establish a password.

d) Newsletter subscription: In order to receive commercial communications about products and services offered by Esquiades.com, the email of the client or user will be requested.

e) Information regarding contact forms: Through the contact form enabled for this purpose, customers and users can establish direct communication with Esquiades.com, indicating their personal data, for example: name and surname, email and contact telephone number.

f) Information on profiles and web browsing: Every time a user visits our website, regardless of whether a reservation is formalised or not, Esquiades.com can collect certain information such as the user's IP address, , the dates and times in which they accessed our web, the browser used or the operating system that is being used. You can get more information in the section "Cookies Policy". We also register the customer's reservations in order to create a customer profile and offer a more personalised service.

g) Information regarding the social profile with which you log in to our website: When the user decides to access our page through the integrated plug-in in a certain social network, the data associated with that profile can be shared with Esquiades.com.

h) Information regarding participation in promotional campaigns, competitions and interaction on our social networks: When a client or user participates in contests, promotions, forums or similar both on our website and on one of the Esquiades.com profiles of the different social networks used by the company, certain customer data may be obtained such as: name, alias, email, preferences ("likes") and comments made.

i) Information regarding the use of our mobile application: When the user downloads the Esquiades.com application for mobile devices, they will be required to grant their express consent for the use of a series of data related to their mobile device and location. The computer system that manages the application for mobile devices will create a personal identifier number for each device. For the correct development of the features included in the Esquiades.com mobile application, it is necessary for our entity to collect a series of data related to your mobile device: the push notification token used by the GCM protocol (Google Cloud Messaging) in devices with Android technology and the APN protocol (Apple Push Notifications) in devices with iOS technology; the name of the device from which the user connects; the type of device the user accesses the application; the operating system version of the mobile device; the date on which the application was first installed; the date on which the application was last accessed; the number of times the user has accessed the application; date on which the last notification was sent. Esquiades.com can obtain the location data of the mobile device from which the application is accessed as long as the user has authorised it when installing the application. The location data is not associated with a specific identified user. The use of data location allows our application to offer certain services.

4.- Where is the information obtained stored?

In accordance with the provisions of the General Data Protection Regulation and Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights, Esquiades.com informs you that the data obtained will be included in different records of treatment activity, the maximum security measures being applicable to all of them.

Esquiades.com uses the systems of "hiring in the cloud" for the storage of the personal data of its clients. For this, it uses suppliers located both inside and outside the European Union. However, all suppliers located outside the European Union comply with the guidelines of the Privacy Shield between the US and the European Union: Google LLC; Amazon Web Services, Inc.

5.- For what purpose is the obtained data processed?

Esquiades.com uses the data provided by customers and users for the following purposes:

- **Reservation management:** Our company uses the personal data of the clients to manage their online reservation and to be able to provide their data to the accommodation and providers of the services that have been reserved. Similarly, the customer can contact and provide information and personal data to Esquiades.com through the contact section enabled to manage requests related to your reservation.
- **User account management:** Our web pages offer the possibility of creating a user account in order to help customers view their previous reservations and make future reservations. Our company collects the data of its users in order to keep the client's account active.
- **Customer comments (surveys):** Esquiades.com can use the contact information of its clients to invite its users to write comments that will be published on the website in order to provide useful information to other users. The purpose of this is to evaluate the quality of the services provided and respond to suggestions from our customers and users.
- **Commercial actions:** Esquiades.com carries out different marketing actions aimed for those who are or have been their clients at some time in order to facilitate commercial advertising that we believe may be of interest (newsletter).
- **Location data:** The application for mobile devices can use the information received about its location through wifi networks or through the use of its GPS to show certain services on our application. When the user installs the application, he or she expressly consents to the processing of said data. The information regarding your location data will not be stored on our servers in any case.
- **Surveys and market studies:** On certain occasions, we provide our clients questionnaires for the commercial market studies. We analyse your preferences for the improvement of our services. The client expressly accepts that upon completion of their stay in the selected accommodation VIAJES PARA TI, S.L.U can send you a satisfaction survey regarding your stay. The response of the surveys sent is totally free and voluntary, therefore, when the user responds to a survey, it is understood that he expressly accepts the present privacy policy applicable to his / her personal data.
- **Information regarding web browsing:** It is used to obtain statistical data about user visits to different web platforms or mobile applications, as well as to show personalised information about the products and services of our company.
- **Participation in promotional or commercial campaigns and contests:** Participation in these campaigns implies the express consent of the user for the treatment and transfer of their data in accordance with the provisions of the legal bases of the campaign in which they participate.
- **Elaboration of personalised commercial information:** With the acceptance of the present Privacy Policy, the express consent of the user (which will always be considered revocable) is recorded so that Esquiades.com can elaborate profiles based on the preferences of the users and remit commercial information that may be of interest to the client or user. However, automated decisions are not made based on the profiles of our customers. The

information will be used to offer a personalised service and show other information such as adverts related to the customer's preferences.

- Compliance with legal obligations: The personal data obtained is stored to answer the legal obligations that are applicable to our company (for example: accounting, tax, mercantile, administrative obligations).
- Detection and prevention of fraudulent activities: The personal data obtained is stored to detect, prevent and avoid fraudulent activities or that go against contractual good faith.
- Other type of communications: Our company can contact clients via email for different reasons such as answering the questions previously sent to us; manage the requests that have been made to us; or to establish any other kind of communication.
- Electronic communications, SMS or mobile application (push notifications): Our company may contact the customer or user due to the existence of relevant news in the booked reservation or relevant events that may affect it, as well as for commercial communications.

6. Legitimation of data processing

The usual legal bases that allow the treatment of customer and user data are:

- a) The execution of the subscribed contract: For the correct development, management, execution and control of the formalised contractual provision (travel reservation) it is necessary that the clients or users provide their personal data.
- b) The consent of the interested party: For some of the assumptions of obtaining information described in this Privacy Policy, part of the consent of the interested party, has been done expressly by accepting the Privacy Policy applicable to the services (for example: sending of newsletter or download of the mobile application).
- c) Due to legal obligation: On certain occasions, Esquiades.com is obliged to store personal data and make them available to administrative or judicial authorities that so request.
- d) Legitimate interest: In certain cases, the legal basis used for the processing of personal data may be the legitimate interest of the company VIAJES PARA TI, S.L.U.

We inform you that the opposition to certain data treatments may result in the impossibility of providing the service. Therefore, Esquiades.com declines any type of responsibility that may arise from this fact.

7.- To whom can personal data be communicated?

The client or user of the Esquiades.com services expressly consents and authorises VIAJES PARA TI, S.L.U., to transmit their personal data to third parties or companies in order to guarantee an adequate provision of the service. Our company can share the personal data of its customers and users in the following cases:

- Providers of tourist services: In order to correctly manage the reservation and to develop and control the provision of the corresponding service, it is necessary to share with the reserved accommodation, management companies, ski resorts, leisure service providers, global reservation systems or similar, the data of the client and the people who travel with him.

- Tour-operation, transport and financial entities service providers: Esquiades.com can use external service providers such as tour operators, transport companies, and / or payment gateways of banking entities, among others, with the objective of Properly develop the provision of services that are contracted as well as validate and verify the payment of contracted services. Third parties who are involved in any of these external services will be subject to confidentiality agreements and will only be allowed to use the personal information of our clients in accordance with the purposes described in this privacy policy.

- Electronic messaging services: For the correct contractual development and in order to be able to issue whatever documentation is necessary for the client, Esquiades.com uses the services of external electronic messaging providers such as Gmail (Google Platform). Google complies with the standards and guidelines set by the US-EU Privacy Shield, being able to obtain verification of said end here.

VIAJES PARA TI, SLU occasionally uses external platforms to send advertising and other information to our customers and/or those who have subscribed to any of our services. These external platforms will be subject to our confidentiality terms and conditions and will only have access to our customer's details for the reasons described in our privacy policy. The main platform is MailChimp, which follows the guidelines stated in the EU-US Privacy Shield ([see](#)).

- Social Media: in the situations provided in the privacy policy and other legal cases.

- Entities that provide external advertising services and personalised services: In order to offer segmented advertising and, therefore, a personalised service that fits with the customer's wishes, VIAJES PARA TI, SLU can send our customers' details to these external platforms. The supplier will have to comply with the privacy policy and will only be able to use our customers' details to provide the services specified in our privacy policy and should follow the guidelines offered by VIAJES PARA TI, SLU.

- Insurance entities: In the event that the user hires a travel insurance, Esquiades.com may assign the customer data necessary for the formalisation of the insurance contract to the different insurance entities.

- Company in charge of auditing or corroborating opinions (Verified Opinions.com): In case the client responds to the surveys or questionnaires provided by our company, these opinions may be sent, occasionally and randomly, to the Verified Opinions entity, which is our official partner for the verification of user opinions.

- Competent administrative and / or judicial authorities: Esquiades.com may share the personal data of its clients with the competent administrative or judicial authorities in case the latter requires the company to provide data of a specific client. These requirements include court orders, subpoenas and orders derived from legal proceedings or criminal investigations.

- Collaborating financial entities: In order to detect, prevent and solve activities that may be fraudulent, Esquiades.com may communicate personal data to the financial entities that collaborate in the purchase and payment process of the contracted services.
- Companies of the corporate group: For administrative and management purposes, the transfer of information between the different entities that make up the corporate group will be allowed.

The customer is committed to guarantee the accuracy of the data provided and expressly and unequivocally gives his consent so that Esquiades.com can transfer his data to the aforementioned recipients in the terms and conditions set forth in this privacy policy, being able to perform this transfer of data to any country in the world, including those entities located outside the European Economic Area.

We inform you that the assignees of the personal data will be subject to the contracts and clauses of confidentiality that are legally required.

8.- How long is personal data kept?

The information that the client provides to Esquiades.com will be stored under strict security criteria and will only be treated in accordance with the purposes described in this section. Likewise, we inform you that, once the contractual service is finished or your requests are resolved, the information obtained will be stored for legal reasons (fiscal, accounting or similar), and at the disposal of the competent public entities. However, the data may be stored for a longer period of time for purposes of historical or statistical archiving, unless the interested party wishes to exercise its rights of opposition, cancellation or deletion.

Likewise, we indicate that the data processed for commercial purposes, including the possible commercial profiles created, will be kept while the interested party does not express the desire to delete them.

9.- Security of the data provided

In accordance with the provisions of the General Data Protection Regulation and Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights, Esquiades.com uses strict security methods that prevent the improper use of your personal information. In order to protect the integrity and security of your data we use physical restrictions that prevent access to your data by unauthorised personnel.

10.- How does Esquiades.com use social networks?

Our company uses social networks in order to promote their services and those of our suppliers as well as to publish and improve our services. In this sense, we have integrated social network plugins on the Esquiades.com website. Therefore, when the user logs in with their social network account and interacts with the profile of Esquiades.com (through "likes", comments or "tags", among others), the information will be shared between Esquiades.com and the provider of that social network, understanding that the user agrees to share the corresponding information.

All information that is shared between the user and Esquiades.com through social networks (through posts on the Esquiades.com wall, "likes" or private or direct messages) is subject to the policies and conditions that the provider of the social networks establish. On the other hand, you are allowed to log in to the Esquiades.com services from different social networks and this information is shared with our company. The provider of each social network can inform you about the process of your data in each case. Esquiades.com reserves the right to "repost" the images that users publish and publicly display in the Esquiades.com profile of any social network, all in order to give greater visibility to the products and services offered by our company.

In the event that identifiable people appear on certain images, the user who published them guarantees that they have the consent of the people affected by the publication. In any case, the user or the people included in the publication have the power to request the removal of the published images.

In case Esquiades.com notices that any of the images displayed on public profiles of a certain user may be interesting for commercial dissemination (either by containing "tags" related to Esquiades.com, or by containing images or comments related to services provided by Esquiades.com, or for a similar reason to the above), we will contact the user who has published the comments or images referred to in order to request their express consent for the publication of these contents in public profiles of Esquiades.com as well as web portals owned by the company. In no case, images will be published without the express authorisation of the user. In the above case, the user declares that he / she is the owner of the images or comments published and that, in the event that identifiable physical people appear in certain images, he / she has the express authorisation of these for commercial dissemination.

In any case, the user who owns the images or comments transferred may revoke the consent provided for the use of the transferred content.

11.- How does Esquiades.com use the customer comments?

Once you have enjoyed your stay in the reserved accommodation, Esquiades.com can provide you with a form in which you can include the comments that the client deems appropriate in relation to the accommodation in question in order to inform other travellers about the quality of the accommodation, the services of the accommodation and in turn to be able to communicate with Esquiades.com, so that we can improve the quality of our services.

The user can choose the name with which his comment appears, and can change it when he deems it appropriate. The user accepts that his comments appear published in a visible way on the Esquiades.com website, in their social network profiles, in their applications for mobile devices, in commercial communications that can be sent by Esquiades.com, as well as in web pages and applications for mobile devices owned by the hosting on which the comments are posted.

We indicate that all the opinions and information included in the responses of the aforementioned surveys as well as the comments inserted in the profiles of Esquiades.com in the different social networks will be converted into public information (accessible to the rest of users). Therefore, customers and users are recommended to adopt the necessary cautions when posting comments or sharing personal information.

VIAJES PARA TI, S.L.U is not responsible for the comments made by users, who are the ones who assume in their entirety the responsibility that may arise from their expressions uttered. VIAJES PARA TI, S.L.U will have the right not to publish, delete or omit those comments that have as their object insults or that may be considered offensive, obscene or that violate the right to honour, privacy and own image of any person.

12.- What are the rights that assist customers and users?

In accordance with the provisions of the General Data Protection Regulation and Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights, Esquiades.com informs you that you can exercise for free the rights of access, rectification, cancellation (deletion), limitation or opposition by writing to the following email address: legal@viajesparati.com or by mail to VIAJES PARA TI, SLU - Avda. Bellisens 42 TecnoParc Building, Office 129, 43204-Reus (Tarragona).

The consent given for the processing of your personal data will always have the character of revocable. Likewise, we indicate that in certain cases you have the right to the portability of your personal data.

The client or user can cancel the sending of commercial communications through the hyperlink enabled for this purpose in each newsletter or by writing to the following address: legal@viajesparati.com.

At any time, the client or user may revoke their consent for their geolocation or the cookie installation for the tracking or the navigation realisation profiles by modifying the privacy options of their web browser or their terminal.

Customers and users have the right to file a claim with a data protection authority. You can check the list and contact details of the European data protection agencies on the European Commission website at http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

If you wish, you can obtain more information about your rights and how to exercise them on the website of the Spanish Agency for Data Protection at <http://www.agpd.es> or on the website of the data protection authority of your country.

13.- How can I resolve my doubts about the treatment of my personal data?

Esquiades.com provies users, within its internal organisational structure, the appropriate personnel that will solve all the doubts that may have in relation to the processing of their personal data. You can contact as follows:

Legal Department (legal@viajesparati.com)

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