



## **DATA PRIVACY POLICY IN WEB USER REGISTRATION**

ESQUIADES.COM, trademark owned by VIAJES PARA TI, S.L.U. (TIN B55666952), - as Responsible for the Treatment -, is committed to guarantee, in accordance with the legal parameters established for the purpose, the integrity and security of the data that you provide.

The person responsible for the treatment is VIAJES PARA TI, S.L.U., TIN B55666952, registered in the Mercantile Register of Tarragona, Volume 2903, Book 0, Folio 37, Section 8<sup>a</sup>, Sheet T 48873, 1st Inscription, with registered office in Bellisens Avenue, 42 Building TecnoParc Office 129, 43204- Reus (Tarragona).

ESQUIADES.COM offers online services through its own website and its applications for mobile devices. The information detailed in this document is applicable to all mentioned platforms:

Aspects to take into account about the privacy of your data:

### **1. Type of information stored**

To proceed with the registration of a user, the interested party must indicate their name and surnames, email address, and determine a password. All this data is essential to be able to formalise the user's registration.

Each time a user visits our website, regardless of whether or not he/she makes a reservation, ESQUIADES.COM may collect certain information such as the IP address of the user, the browser that is being used or the operating system that is being used.

When the user downloads the ESQUIADES.COM application for mobile devices, it will require users to grant your express consent for the use of a series of data related to your mobile device and the location.

The computer system itself that manages the application for mobile devices will create a personal and unique numerical identifier number for each device.

For the correct development of the features included in the ESQUIADES.COM application for mobile devices it is necessary that our entity compiles a series of data related to the 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 since 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 opened for the last time, the number of times the user has accessed the application, and the 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 stored in our servers in any case and is only used in order to show their situation on the current accommodation location map.

Similarly, if the user uses a mobile device, data can also be collected to identify the device and its latitude or longitude coordinates when the user authorises it.

However, none of this data, understood individually, allows us to identify a user, but this data is considered personal information.

## **2. Where is your information stored?**

In accordance with the provisions of the General Data Protection Regulation and the Organic Law 3/2018, December 5th, Personal Data Protection and Digital Rights Guarantees, ESQUIADES.COM informs you that the data obtained once the signed form or contract will be included in a record treatment activity called "REGISTERED USERS". ESQUIADES.COM uses "cloud hiring" systems for the storage of the personal data of its users. For this, it uses suppliers located both within as outside the European Union. However, all suppliers located outside the Union European Union comply with the guidelines of the Privacy Shield between the US and the European Union: [Google LLC](#); [Amazon Web Services, Inc.](#)

## **3. Exercise of the rights of access, rectification, cancellation (deletion), limitation or opposition.**

In accordance with the provisions of the Organic Law 3/2018, December 5th, as well as in the General Regulation of Data Protection, ESQUIADES.COM informs you that you can exercise free of charge the rights of access, rectification, cancellation (deletion), limitation or opposition by writing a letter to the following email address:

legal@viajesparati.com or by mail to VIAJES PARA TI, S.L.U. - 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 you are entitled for the portability of your personal data. The user can unsubscribe from the services at any time.

The interested party, in the event of not seeing his rights properly addressed, has the right to make a claim regarding the protection of personal data through the Spanish Agency of Data Protection.

## **4. When and for what ESQUIADES.COM collects and uses your personal data?**

Legitimation and Purpose of the treatment.

The legal basis for the treatment of the users data on our platforms will always be the consent of the interested party. Your data will be processed for the following purposes:

- User account management: Our web pages offer the possibility to create a user account to view your previous reservations and make future reservations. Our company collects the data of its users in order to keep the user's account active.

- Commercial actions: ESQUIADES.COM carries out different marketing actions aimed at current customers or users that have been customers at some point in order to provide them Commercial advertising that we consider that may be of interest them.
- Surveys and market studies: On certain occasions, we provide questionnaires to our users for commercial market studies. We analyse your preferences for the improvement of our services.
- Electronic communications, SMS or mobile applications: Our company can contact customers on certain occasions if relevant changes occur, as well as for sending commercial communications.

The information that the user provides to ESQUIADES.COM will be stored under strict criteria security and will only be treated in accordance with the purposes described in this section. The information obtained will be stored until the user does not request expressly the elimination.

## **5. Consent to transfer data to third parties**

The user of the ESQUIADES.COM services expressly consents and authorises VIAJES PARA TI, S.L.U., to transmit personal data to third parties with in order to guarantee an adequate provision of the service. Our company can share the data of their clients and users in the following cases:

- Electronic messaging services: For the correct development of the agreed service and in order to be able to issue whatever information is necessary for the user, ESQUIADES.COM uses external electronic messaging services 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 this 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 ([here](#)).

- 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.
- Competent authorities: ESQUIADES.COM may share the personal data of its users with the competent administrative or judicial authorities in case the latter require to the

company to provide data for a specific user. These requirements include judicial orders, subpoenas and orders derived from legal processes or criminal investigations.

The user undertakes to guarantee the accuracy of the data provided and provides consent expressly and unequivocally so that ESQUIADES.COM can transfer the data to the recipients in the terms and conditions set out in this privacy policy, being able to transfer the data to any country in the world. All of it for the sole purpose of being able to carry out correctly the agreed services and in accordance with the purposes described in this privacy policy.

## **6. Data security and secrecy duty**

In accordance with the provisions of Organic Law 3/2018, December 5th, ESQUIADES.COM uses strict security methods that prevent the use of your personal information.

In order to protect the integrity and security of your data we use physical restrictions that prevent the access to the data by unauthorised personnel.

Likewise, ESQUIADES.COM undertakes, expressly, to keep it strictly confidential and confidentiality your personal data. In this way, your data will only be treated for the purposes described in this Privacy Policy.

## **7. Use of ESQUIADES.COM from 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.

## **8. How can I solve my doubts about the treatment of my personal data?**

ESQUIADES.COM makes available to the user, within its internal organisational structure, the adequate staff that will solve any doubts customers may have regarding the treatment of their personal data. You can contact as follows:

Legal Department ([legal@viajesparati.com](mailto:legal@viajesparati.com))

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