

## PRIVACY POLICY

### IDENTITY OF THE PERSON RESPONSIBLE

- **Responsible:** Civis Hoteles S.A.
- **TAX IDENTIFICATION NUMBER:** A12560991
- **Address:** Pintor Oliet nº3, 12006, Castellón, Castellón - Spain.
- **E-mail:** [info@hotelluz.com](mailto:info@hotelluz.com)
- **Contact telephone:** 964 20 10 10
- **Website:** <https://www.hotelluz.com>

### PRINCIPLES APPLIED IN THE PROCESSING OF DATA

*In the processing of your personal data, the Data Controller shall apply the following principles which are in line with the requirements of the new European Data Protection Regulation (GDPR):*

- *Principle of lawfulness, fairness and transparency: the Data Controller will always require consent for the processing of personal data which may be for one or more specific purposes about which the Data Controller will inform the User beforehand with absolute transparency.*
- *Principle of data minimisation: The Data Controller shall request only the data strictly necessary for the purpose or purposes for which it is requested.*
- *Principle of limitation of the storage period: The Data Controller shall keep the personal data collected for the time strictly necessary for the purpose or purposes of the processing. The Data Controller shall inform the User of the relevant retention period according to the purpose. In the case of subscriptions, the Data Controller shall periodically review the lists and delete those records that have been inactive for a considerable period of time.*
- *Principle of integrity and confidentiality: The personal data collected will be treated in such a way that their security, confidentiality and integrity is guaranteed. The Data Controller takes the necessary precautions to prevent unauthorised access or misuse of its users' data by third parties.*

### WEBSITE PRIVACY POLICY

*We are a company in which information transparency is essential for establishing relationships of trust with the people who make up our project and with our suppliers and customers, and protecting the personal data of those who trust us is of vital importance. Accordingly, we want this Privacy Policy to inform you about how we collect, process and use the data.*

*This Privacy and Personal Data Protection Policy establishes the bases on which the company processes the personal data that our users voluntarily send us through the website.*

*The present Privacy Policy will be applicable when the company collects your personal data through different contact forms available in this website. When processing your personal data, the company will act as the Data Controller.*

## **OUR COMMITMENT**

- *To respect the privacy of our users and process their personal data with their consent.*
- *To process the personal data that we strictly need to provide the requested service and process the data securely and confidentially, taking the necessary measures to prevent unauthorized access and improper use thereof.*
- *Not to use personal data for purposes for which we have not previously obtained consent.*
- *Not to send personal information to third parties or share such data.*
- *To keep personal data for as long as is strictly necessary for the specific purpose for which the data were provided, with regular revision of those needs and deletion of data that are not necessary.*

## **WHAT ARE PERSONAL DATA AND PROCESSING OF PERSONAL DATA**

*Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

*Moreover, processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.*

## **WHAT DATA PROCESSING DO WE CARRY OUT AND FOR WHAT PURPOSES**

### **▪ User information request.**

*To manage the information request sent by the user through the contact form, job application form and/or through the e-mail, postal address and phone number provided in the website.*

### **▪ Subscribe to newsletters.**

*To manage the subscription to newsletters.*

### **▪ Work with us by sending your curriculum vitae**

*To manage the received CV through the contact form available in the website.*

### **▪ Creation and access to the user account**

*To manage the creation and access to the user account with the corresponding user name and password.*

### **▪ Management of the comments left on the blog**

*To manage publication of the comments that the user has left on the blog*

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## **WHAT PERSONAL INFORMATION DO WE COLLECT**

*Through our website we may collect personal data for different purposes:*

▪ ***User information request.***

*We will capture the personal data that you have provided us in order to give an answer to your request.*

▪ ***Subscribe to newsletters.***

*We will capture your e-mail address.*

▪ ***Work with us by sending your curriculum vitae***

*We will capture the information contained in the CV that you have provided us.*

▪ ***Creation and access to the user account***

*We will capture your user name and password and/or any other information you have provided for the creation of the profile/account.*

▪ ***Management of the comments left on the blog***

*Any personal data that has been published when commenting the post.*

*Depending on the purpose for which the data are provided, only the strictly necessary data will be requested.*

*It is important for the user to be aware of the data provided and the purpose for which it is provided because in so doing, she/he authorizes us to collect, store and use such data for the required purpose and she/he may at any time withdraw the consent provided by the appropriate channels, with the consent of the interested party being the legal basis and legitimacy of the processing of their personal data.*

## **WHAT IS THE LEGITIMATE BASIS FOR THE PROCESSING OF YOUR PERSONAL DATA**

*According to the applicable data protection regulation, we need a legitimate basis for the processing of your personal data. The legitimate basis in this case is your consent.*

## **WHAT RIGHTS DO YOU HAVE OVER THE PERSONAL DATA PROVIDED?**

*Right of access: You have the right to obtain from the company confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data.*

• ***Right to rectification:*** *You have the right to obtain from the company without undue delay the rectification of inaccurate personal data concerning you. In the rectification application you should specify the personal data you wish to rectify.*

• ***Right to object:*** *You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interest. The company shall no longer process the personal data unless the company demonstrates compelling legitimate grounds for the processing which override the interest, rights and freedoms of the data subject or for the or the establishment, exercise or defence of legal claims.*

• ***Right to erasure:*** *You have the right to obtain from the company the erasure of personal data concerning you.*

- ***Right to data portability:*** You have the right to receive your personal data, which you have provided to the company, in a structured, commonly used and machine- readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.
- ***Right to restriction of processing:*** You have the right to obtain from the company restriction of processing where: the accuracy of the personal data is contested by the data subject; the processing is unlawful and the data subject opposes the erasure of the personal data and request the restriction of their use instead; the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

You can exercise your rights by sending a request to the address specified above or via e-mail to the following e-mail address [administracion@hotelluz.com](mailto:administracion@hotelluz.com).

With your request you must send a copy of your ID.

Likewise, we inform you that if you are not pleased with our answer, you can fill a complaint in front of the competent authority (Agencia Española de Protección de Datos).

#### **DATA SECURITY AND STORAGE**

We will retain the data for the time strictly necessary for the provision of the requested service and as long as the data subject does not request its deletion, adopting the appropriate technical and organizational measures against unauthorized or illegal processing and against accidental loss, destruction or damage, and doing everything possible to protect and maintain the data securely.