

PRIVACY POLICY

The purpose of this privacy policy (hereinafter the "**Privacy Policy**") is to comply with the duty of transparency in the processing of your personal data, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "**GDPR**").

BASIC INFORMATION ON DATA PROTECTION			
DATA CONTROLLER	SELENTA BENALMÁDENA, S.L.U.		
	CATEGORIES OF INTERESTED PARTIES	PURPOSES	LEGAL BASIS
PURPOSES	- Users	- To enable their navigation	- Consent
	- Clients	- Booking request	- Performance of a contract
		- Management of the stay	- Performance of the contract
		- Sending commercial communications	- Consent
		- Sending of quality control surveys	- Legitimate interest
	- Requests for information	- To answer requests for information, resolve doubts, queries or process claims	- Performance of pre-contractual measures
	- Others	- Video surveillance	- Public interest
RECIPIENTS	<ul style="list-style-type: none"> - Administrations and Public Bodies. - Grupo Selenta entities for internal administrative purposes. If you have consented, your data may also be communicated to other companies of the Selenta Group for the sending of commercial information and, where appropriate, to create a commercial profile to personalise the communications sent. - Third parties that have access to your personal information associated with your browsing on the Website. 		
RIGHTS	Revocation of consent, access, rectification, portability, opposition, restriction of treatment and erasure of data.		
ADDITIONAL INFORMATION	If you consider that any of your rights have been violated, you can file a claim with the Spanish Data Protection Agency (AEPD).		

The information contained in this Privacy Policy allows users to see details about the various types of processing that are carried out as a result of accessing and using the www.hotelbenalma.com website (hereinafter, the "**Website**") and in relation to the services accessible or offered therein.

1. IDENTIFICATION OF THE DATA CONTROLLER

We inform you that the data controller is **SELENTA BENALMÁDENA, S.L.U.** (hereinafter, "**hotel BENALMA**" or the "Data Controller"), with registered office at Carretera nacional 340, km 217 (29630) Benalmádena, Málaga, (España) and with company tax number (NIF) B96762166.

2. PURPOSES OF THE PROCESSING OF PERSONAL DATA AND LEGAL GROUNDS

The Data Controller may process your personal data for the purposes and based on the legal grounds detailed below:

USERS:

- To enable their navigation of the Website, thus allowing them to access the information and content established by it. Although the visit to the Website does not oblige users to provide any personal information, certain features depend on the use of cookies, as reported in the [Cookies Policy](#). The legal grounds are the consent expressly given when accepting cookies from the Website, where appropriate.

CLIENTS:

- To manage booking requests for our services made through the channels enabled for this purpose on the Website, with the performance of the contractual relationship being the legal basis that enables the processing of data. When you make the reservation or are redirected to the website of a third party for this purpose, you must consider their privacy policy.
- To manage clients' hospitality and stays at hotel BENALMA with the performance of the contractual relationship being the legal basis that enables the processing of data.
- If you are already a client, hotel BENALMA may send you commercial communications about products or services similar to those previously contracted, basing the legitimacy of the processing on the legitimate interest of hotel BENALMA in promoting its services through commercial communications, in accordance with the provisions of the 34/2002 Act on services of the information society and electronic commerce.
- If you are not a customer, hotel BENALMA may send you commercial communications about products and services, provided it has previously obtained your consent, after you have been informed about the processing of your data.
- To send you quality control surveys after the end of your stay at our facilities. The legal grounds that enable the processing is the legitimate interest of hotel BENALMA in controlling the quality of our services and evaluating customer satisfaction, as well as detecting areas of improvement.

INFORMATION REQUESTERS:

- To manage your request for information, if you provide your personal data through the contact form or email made available on the Website, in order to answer your requests for information, resolve your doubts, queries or process your claims. The legal grounds

that enable the processing of your data is the application of pre-contractual measures required to process your request. Therefore the processing is necessary to allow the proper processing of your requests for information, resolution of your doubts, answer to your queries or the processing of your reported complaints and verify the operation of the service in accordance with the established procedures, as well as to obtain evidence of the content of the requests received and the reason for the processing of the personal data you may provide.

OTHERS:

- When you access BENALMA premises, establishments or hotel accommodation, you will be informed by means of easily identifiable posters about the capture of your image for video surveillance purposes. The legal grounds is the performance of a mission in the public interest in accordance with Article 6.1 e) of the GDPR.

3. NEED TO PROVIDE PERSONAL DATA

The processing of your requests for information and the management of reservation of services entails the need to provide, at least, the data requested in the prepared forms that are identified as mandatory. The refusal to provide this data means your request cannot be processed.

Additionally, you can provide other additional non-mandatory data through the forms or through the enabled contact channels, and allow the collection of data through the use of non-necessary cookies.

4. RETENTION PERIOD OF YOUR PERSONAL DATA

The Data Controller will process your data as long as they are necessary for the purpose of the processing as indicated below and, once completed, may be kept for the periods legally required for possible liabilities arising from the processing.

USERS

The data processed in order to enable their navigation on the Website and allow the uses associated with the installation of cookies will be kept for the periods indicated in each case in the Cookies Policy.

CLIENTS

In order to manage the reservation of the requested services and their stay at hotel BENALMA, the data will be kept as long as the contractual relationship for the provision of the service lasts.

The data processed for the sending of commercial communications and quality surveys will be processed until they oppose the processing for these purposes or, where appropriate, revoke their consent.

INFORMATION REQUESTERS

The data processed to manage and respond to their questions and/or requests for information received through the different contact channels indicated on the Website will be processed

for the time required to correctly answer their questions and/or specific requests according to each case.

OTHERS:

The data collected for video surveillance purposes will be kept for a maximum period of one month, unless it is necessary to keep them for longer because it is useful for the establishment of liabilities arising from the recorded facts, in which case they may be kept until the end of this process.

THIRD-PARTY RECIPIENTS OF THE DATA

Their personal data may be communicated to the competent Administrations and Public Bodies that might request them at any given time, in accordance with current legislation.

In addition, your data may be communicated to Grupo Selenta entities for internal administrative purposes. If you have consented, your data may also be disclosed to other companies of the Selenta Group for the sending of commercial information and, where appropriate, to develop a commercial profile to personalise the communications sent.

For information on the processing carried out by the companies that are part of the Selenta Group, visit the Group's Privacy Policy, available at <https://selentagroup.com/en/privacy-policy/>.

Finally, it is possible that some third parties have access to your personal information associated with your navigation on the Website through third-party cookies as indicated in the [Cookies Policy](#).

5. INTERNATIONAL TRANSFERS

The processing of your data may involve international transfers outside the European Economic Area, in which case the controller will implement the appropriate safeguards that should be adopted where appropriate, in accordance with articles 44 et seq. of the GDPR.

Additionally, the use of cookies by third parties may involve international transfers of your personal data under the terms provided in the Cookies Policy. You can see the privacy information of the third parties that use cookies on this website in our [Cookies Policy](#).

6. EXERCISE OF RIGHTS

You may exercise, by writing to hotel BENALMA at the email address dpo@selentagroup.com or to the address Carretera nacional 340, km 217 (29630) Benalmádena, Málaga, (España) accrediting your identity, at any time and free of charge, the rights that assist you in terms of data protection and, specifically, the following:

- To access your personal data and obtain confirmation about whether hotel BENALMA is processing personal data concerning you.
- To rectify inaccurate or incomplete data.
- To oppose the processing of your personal data in certain circumstances and for reasons related to your particular situation (specifically, when the processing is based on the legitimate interest of hotel BENALMA). Hotel BENALMA will stop processing the data, unless there are compelling legitimate interests, or for the exercise of or defence against possible claims.
- To revoke the consent previously granted (including the sending of commercial information). The revocation will not affect the legality of the processing carried out previously.
- To restrict the processing of your data, when any of the conditions provided for in the regulations are met; in particular, you are informed that you may request the restriction of the processing carried out for profiling.
- To request the erasure of your data when, among other reasons, the data are no longer required for the purposes for which they were collected.
- To request the portability of the data provided by the user in those cases provided for in legislation.

You may also file a claim with the Spanish Protection Agency, at the address Calle de Jorge Juan, 6, 28001, Madrid, if you consider that the rights recognised by the applicable legislation for the protection of your personal data have been violated.

7. SECURITY MEASURES

Hotel BENALMA hereby informs you that it will treat your personal data absolutely confidentially and will maintain the mandatory duty of secrecy with respect to them, in accordance with the provisions of the applicable legislation, adopting for this purpose the necessary technical and organisational measures to guarantee the security of your data and avoid their alteration, loss, processing or unauthorised access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed.

8. PRIVACY POLICY UPDATE

Hotel BENALMA reserves the right to amend this Privacy Policy in order to adapt it to your needs or any new applicable legislation. In such cases, it will announce the changes introduced and publish them on this Website, so that you can access them easily at any time.

Last updated: February 2023

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