

PRIVACY POLICY

Last update: July 2024

Contact details

Trading name	
Legal entity	CAFE GRUP 2007, S.L and any of its Affiliates (jointly, "Royal Hotels Barcelona", "we" or "us").
Domicile	Rambla dels Estudis 117, Dcho.1 <u>08002 Barcelona</u>
Tax number	B64470776
Email	info@royalhotels.es
Phone	+34 937370010
DPO	info@royalhotels.es

(Data Protection Officer)

Welcome

- We welcome you to our Privacy Policy intended for any Data Subject.
- In this Policy we explain what Personal Data we process in the development of our activities, or derived from the use you make of our Website(s), or when you make a booking in our hotels, or when you interact in any other way with Royal Hotels Barcelona, for example as a subscriber to our newsletter(s), or if you are a member of Club Royal, Royal Hotels Barcelona's loyalty platform.
- And we inform you about how we process Personal Data and for what purposes, and what your rights are and how to exercise them.
- To facilitate its understanding, the Policy includes terms in capital letters whose meaning you can consult in the "**Definitions**" section.
- Remember that you have the right to lodge a complaint with a single Supervisory Authority. However, we would appreciate it if you contact us first, to have the opportunity to resolve any questions, complaints, suggestions or comments that you wish to send us.

Personal Data we process and purposes of the Processing

- 1 **Our services**
 - Customers

Categories of Data and Purposes	
1)	<ul style="list-style-type: none"> ▪ Contact information (name, domicile, phone number and/or email address) ▪ Room or restaurant bookings (name, surname, email, phone, credit card) ▪ Join the Club (loyalty platform), requested information: name, surname, email, birthday, country). ▪ In both cases, you will be asked to confirm if you wish to subscribe to news an updates. ▪ Contact forms for inquiries, you are asked for (name and surname, email, phone number, message) ▪ Making reservations (depending on the selected rate, making payment as well). ▪ Registering for the loyalty program, ▪ Contacting the hotel (registration forms or via chat).
2)	<ul style="list-style-type: none"> ▪ Usage data on our websites. These help us improve our Websites, resolve issues, ensure security and functionality, etc. (see cookies section)

2	<p>Professional contacts</p> <ul style="list-style-type: none"> ▪ Our team (employees, intern workers, managers, collaborators, advisors, participants in selection processes, etc.) ▪ Providers, clients and investors
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Categories of data	Purposes
<ul style="list-style-type: none"> ▪ Professional contact information ▪ Employment data and other data necessary for the management of the employment or professional relationship 	<ul style="list-style-type: none"> ▪ Management of the employment or professional relationship with clients, suppliers, advisors and other professional stakeholders ▪ Investor relationship management

Source from which the Personal Data originate	
<ul style="list-style-type: none"> ▪ Royal Hotels Barcelona accesses Personal Data through the Data Subject or Customer. ▪ We do not obtain data from other third parties or other sources. 	

Recipients	
<ul style="list-style-type: none"> ▪ We do not share data with other companies, only with companies that own the IT systems for the provision of the Services. <ul style="list-style-type: none"> - Click to travel company: Website. - Mirai company: room booking engine and loyalty platform. - Covermanager company: restaurant booking engine. - Quicktext company: chatbot on website. - Siteminder company: Channel manager for booking connection with PMS. - Mews company: PMS (hotel management system). 	

Legal Bases	
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<p>Consent</p>	<ul style="list-style-type: none"> ▪ We will also request your Consent to send you commercial communications electronically, unless you have requested them, or unless to inform you about news related to our services in the event that you are already a Customer, always offering you the possibility of telling us, in a simple way and free of charge, that you do not wish to continue receiving such commercial communications. ▪ Likewise, we will request your Consent to use Cookies that are not strictly necessary. ▪ In all cases in which we process your Personal Data based on your Consent, you have the right to withdraw it at any time. ▪ The withdrawal of consent shall not affect the lawfulness of Processing based on Consent before its withdrawal. ▪ We strive to make it as easy for you to withdraw Consent as it is to give it, if you have any problem contact us.
<p>Performance of a contract</p>	<ul style="list-style-type: none"> ▪ If you book with us, we will process data that is necessary for the performance of a contract to which you are a party as a Data Subject or in order to take steps at your request prior to entering into a contract.
<p>Legitimate interest</p>	<ul style="list-style-type: none"> ▪ Processing of professional contacts with providers, clients and other stakeholders for the management of the respective professional relationships. ▪ Processing of aggregated, pseudonymized information for scientific research, product development or statistical purposes. ▪ Processing of technical or usage data of our Website(s) to the extent necessary for their functionality and security.

Direct marketing, Automated Decision-making, Profiling and International Transfers

<ul style="list-style-type: none"> ▪ We do not carry out commercial actions unless our Newsletters if you are subscribed ▪ We do not carry out Automated Decisions or Profiling. ▪ We also do not transfer Personal Data outside the European Union, except for pure storage on our IT providers whose server location does not depend on us; if we make any International Transfer, it will be to countries with an adequacy decision confirmed by the European Commission, or failing that, with appropriate safeguards (such as the signature of standard data protection clauses adopted by the European Commission or a Supervisory Authority, a code of conduct or an approved certification mechanism together with binding and enforceable commitments to apply the appropriate safeguards, including as regards Data Subjects' rights), and on condition that enforceable rights and effective legal remedies for Data Subjects are available.
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Minors

<ul style="list-style-type: none"> ▪ Our Website(s) and this Privacy Policy are not addressed to minors.

Our Website(s)

<ul style="list-style-type: none"> ▪ This Privacy Policy applies to our Website(s), unless otherwise indicated or a specific privacy policy is included. ▪ Our Webs may include links to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share Personal Data about you. We do not control these third-party websites and applications and are not responsible for their privacy policies or practices.

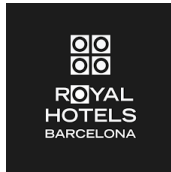
Your rights and how we protect them

- Applicable Regulations grant the following rights to the Data Subject:

Access	▪ to your Personal Data which we process, and to obtain information on the categories of data concerned, purposes, Recipients, envisaged storage periods or criteria used to determine them, etc.
Rectification	▪ of inaccurate Personal Data concerning you, and to have incomplete Personal Data completed.
Erasure (“right to be forgotten”)	▪ of those Personal Data which are no longer necessary in relation to the purposes for which they were collected or otherwise processed; or in the cases when you withdraw your Consent; or in certain cases of objection; or if the Personal Data have been unlawfully processed.
Restriction	▪ temporary blocking of your data in certain cases (inaccuracy, unlawfulness, non-necessity, objection), so that they can only be used with your Consent.
Portability	▪ right to receive your Personal Data in a structured, commonly used and machine-readable format, and right to require us to transmit those data to a third party, where the processing is based on Consent pursuant or on a contract and the processing is carried out by automated means.
Objection	▪ to the processing of your Personal Data based on our legitimate interest, on grounds relating to your particular situation, especially for direct marketing, Profiling, scientific research or statistical purposes.
Right to human intervention	▪ in the processing of your Personal Data, and particularly not to be subject to Automated Decisions, including Profiling.

- We undertake to respond to your requests promptly, and in any case, within one month.
- In case complexity or the number of requests so requires, we could need to extend our reaction periods by a maximum of two further months, in which case we will inform you of any such extension together with the reasons for the delay.
- If we consider that we should not take action on your request, we will inform you without delay (at the latest within one month) of the reasons for not taking action and on the possibility of lodging a complaint with a Supervisory Authority and seeking a judicial remedy.
- Any communication with us for exercising your rights shall be free of charge. However, if your request is manifestly unfounded or excessive, in particular because of its repetitive character, we may either charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested, or refuse to act on the request.
- If we have reasonable doubts concerning your identity as the natural person making the request, we may need you to provide additional information necessary to confirm your identity. Consider that there may be situations where we had erased the data allowing us to identify you, when the purposes for which we initially processed your data do no longer require your identification, thus in those cases we will not be able to act on your request unless you provide us with additional information enabling your identification.

Organisational and security measures



- Access to Personal Data is protected by individual user accounts and passwords for each employee.
- Royal Hotels Barcelona establishes means to protect information from possible external intrusions and data loss through appropriate physical and logical measures, including:
 - Antivirus
 - Backups for data stored both locally and, in the cloud
 - Periodic key changes
 - Or others such as encryption, double authentication systems, pseudonymization or anonymization as possible.
- In case of Personal Data Breaches, we will implement appropriate technical and organisational protective measures and, if required according to Applicable Regulations, we will notify the Personal Data Breach publicly or individually, without undue delay, if it is likely to result in a high risk, and we will strive to provide you clear information about the nature of the Personal Data Breach, including, (a) where possible, the categories and approximate number of Data Subjects and Personal Data records concerned; (b) the contact details of our Data Protection Officer or other contact point where more information can be obtained; (c) the likely consequences; and (d) the measures taken or proposed to be taken.

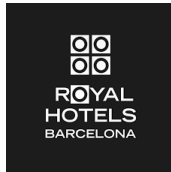
Retention periods

- We store the data for the periods necessary to:
 - Compliance with a legal obligation: Processing is necessary for compliance with a legal obligation, as foreseen in article 17.3. b) of GDPR.
 - Statistical purposes: When data are processed for these purposes they may be retained in accordance with articles 17.3.d) and 89 of GDPR.
 - Establishment, exercise or defence of legal claims: As set forth in article 17.3.e) of GDPR in connection with article 24 CE (right to effective judicial remedy), data can be retained when they are necessary for exercising rights and for the defence of legal claims.

Definitions: The following terms used in this Privacy Policy have the meaning assigned to them below:

Affiliates	▪ means the affiliates belonging to the “Royal Hotels Barcelona” group from time to time, as we inform in our Website(s).
Applicable Regulations	▪ as a company of Spanish nationality, Royal Hotels Barcelona is bound at the European level by the General Data Protection Regulation and the ePrivacy Directive, and by Spanish regulations, especially by Organic Law 3/2018, of December 5, of Protection of Personal Data and guarantee of digital rights, and Law 34/2002, of July 11, on information society services and electronic commerce.
Automated Decisions	▪ means decisions which may affect the Data Subject and which are based solely on automated processing, such as algorithms and artificial intelligence, which process the Personal Data, without human intervention.
Consent of the Data Subject	▪ means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her

<p>Cookies</p>	<ul style="list-style-type: none"> ▪ Cookies are small text files that websites place on your device while you browse. They are processed and stored by your web browser. In themselves, cookies are harmless and perform crucial functions for websites. Cookies can usually also be viewed and deleted easily. ▪ In general, there are three different ways to classify cookies: what they are for, how long they last and where they come from. <table border="1" data-bbox="456 510 1372 1630"> <thead> <tr> <th colspan="2"></th> <th>¿Do we use them at Royal Hotels Barcelona?</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Duration</td> <td>▪ Session cookies: These cookies are temporary and expire once you close your browser (or once your session ends).</td> <td>▪ YES, strictly necessary.</td> </tr> <tr> <td>▪ Persistent cookies: This category covers all cookies that remain on your device until you delete them or your browser deletes them, depending on the cookie's expiration date.</td> <td>▪ YES, and we verify that they do not last for more than 12 months</td> </tr> <tr> <td rowspan="2">Entity that manages them</td> <td>▪ First party cookies: They are placed on your device directly from the website you are visiting.</td> <td>▪ YES, strictly necessary.</td> </tr> <tr> <td>▪ Third-party cookies: These are cookies that are placed on your device, not by the website you are visiting, but by a third party, such as an advertiser or an analytics system.</td> <td>▪ NO, except that we expressly inform so in any of our Website(s)</td> </tr> <tr> <td rowspan="4">Purpose</td> <td>▪ Technical or strictly necessary cookies: These cookies are essential to navigate the website and use its features, such as accessing secure areas of the site.</td> <td>▪ YES</td> </tr> <tr> <td>▪ Preference or personalization cookies: also known as “functionality cookies”, they allow a website to remember choices you've made in the past (such as language, region, username, and password) so you can log in automatically.</td> <td>▪ YES, and you can reject and disable them at any time.</td> </tr> <tr> <td>▪ Statistical cookies: also known as “analysis or measurement cookies”, these cookies collect information about how you use a website, such as which pages you visited and which links you clicked on. They do not allow your identification, it is aggregated and Anonymous Information. Their sole objective is to improve the functions of the website. This may include cookies from third party analytics services for the exclusive use of Royal Hotels Barcelona.</td> <td>▪ YES</td> </tr> <tr> <td>▪ Marketing or behavioral advertising cookies: These cookies track your online activity to help advertisers deliver more relevant advertising or limit the number of times you see an ad. They may share that information with other organizations or advertisers. These are persistent cookies and almost always from third parties.</td> <td>▪ NO</td> </tr> </tbody> </table>			¿Do we use them at Royal Hotels Barcelona?	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They do not allow your identification, it is aggregated and Anonymous Information. Their sole objective is to improve the functions of the website. This may include cookies from third party analytics services for the exclusive use of Royal Hotels Barcelona.	▪ YES	▪ Marketing or behavioral advertising cookies: These cookies track your online activity to help advertisers deliver more relevant advertising or limit the number of times you see an ad. They may share that information with other organizations or advertisers. These are persistent cookies and almost always from third parties.	▪ NO
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	▪ Preference or personalization cookies: also known as “ functionality cookies ”, they allow a website to remember choices you've made in the past (such as language, region, username, and password) so you can log in automatically.	▪ YES, and you can reject and disable them at any time.																					
	▪ Statistical cookies: also known as “ analysis or measurement cookies ”, these cookies collect information about how you use a website, such as which pages you visited and which links you clicked on. They do not allow your identification, it is aggregated and Anonymous Information. Their sole objective is to improve the functions of the website. This may include cookies from third party analytics services for the exclusive use of Royal Hotels Barcelona.	▪ YES																					
	▪ Marketing or behavioral advertising cookies: These cookies track your online activity to help advertisers deliver more relevant advertising or limit the number of times you see an ad. They may share that information with other organizations or advertisers. These are persistent cookies and almost always from third parties.	▪ NO																					
<p>Data Subject</p>	<ul style="list-style-type: none"> ▪ means any identified or identifiable natural person whose Personal Data are Processed by Royal Hotels Barcelona. 																						
<p>ePrivacy Directive</p>	<ul style="list-style-type: none"> ▪ means the Directive 2002/58/EC of the European Parliament and of the Council, of 12 July 2002, concerning the processing of personal data and the protection of privacy in the electronic communications sector. 																						
<p>General Data Protection Regulation</p>	<ul style="list-style-type: none"> ▪ means 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, and repealing Directive 95/46/EC 																						



Identifiable natural person	<ul style="list-style-type: none">means any natural person 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.
International transfers	<ul style="list-style-type: none">means the transfer of Personal Data outside the European Union.
Personal Data	<ul style="list-style-type: none">means any information relating to a Data subject.
Personal Data Breach	<ul style="list-style-type: none">means any incident threatening the security of Personal Data leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.
Privacy Policy	<ul style="list-style-type: none">means this Privacy Policy.
Processing	<ul style="list-style-type: none">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.
Profiling	<ul style="list-style-type: none">means any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
Recipient	<ul style="list-style-type: none">means a natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed
Supervisory Authority	<ul style="list-style-type: none">means an independent public authority which is established by a European Union Member State pursuant to the General Data Protection Regulation.in Spain, it is the Agencia Española de Protección de Datos (AEPD) which web is https://www.aepd.es/.
Websites(s)	<ul style="list-style-type: none">means the following websites:<ul style="list-style-type: none">- Royal Passeig de Gràcia https://www.royalpasseigdegraciahotel.com- Royal Ramblas https://www.royalramblashotel.com- Royal Hotels https://www.royalhotelsbarcelona.com