

## PRIVACY POLICY

### I. USER INFORMATION

**Colduronline S.L.**, from now on RESPONSIBLE, is Responsible for the user's personal data treatment and informs you that this data will be treated in accordance with the current personal data protection Legislation, the Regulation {UE} 2016/679 of 27th of april of 2016 {RGPD} relative to the phisical person in respect to the treatment of personal data and free circulation of this data and the Organic Law {ES} {LOPD} relative to the data protection of personal character/nature,the following treatment information is available:

**Treatment purpose:** maintain a business relationship with the User. The operations planned to accomplish the treatment are:

Submission of commercial advertising communications by email, fax, SMS, MMS, social communities or any other electronic or physical means, present or future, that enables commercial communications. These communications will be made by the RESPONSIBLE and related to its products and services, or to its collaborators or suppliers with whom a promotion agreement has been reached. In this case, third parties will never have access to personal data.

Carry out stadistical studies.

Process orders, requests or any type of petitions that are made by the user through any of the contact ways that are available.

Forward the newsletter on the website.

**Data conservation criteria:** this will be kept while there is a mutual interest to maintain the aim of the treatment and when it is no longer necessary for this purpose, it will be eliminated with adequate security measures to guarantee the pseudonymisation of the data or its total destruction.

**Communication of data:** For the proper provision of the service to its customers and the maintenance of the commercial relationship, the RESPONSIBLE may transfer personal data to companies of the Saint Michel Hotels Group, detailed at the end of this section, as well as to Interdocs Solutions Digitales SL B64554629, collaborator in charge of managing the electronic payment of reservations made through the web. With the exception of these cases, the data will not be communicated to third parties, except legal obligation.

**Privacy Policy for social networks:** in compliance with the General Regulation of Personal Data Protection 2016/679 of April 27 and of Law 34/2002, of July 11, Services of the Information Society and Electronic Commerce, informs all the users that THE RESPONSIBLE, makes use of profiles with informative and commercial purposes in social networks:

Facebook

Youtube

THE RESPONSIBLE, will access the data that the user provides in their profile, may make publications

in their personal space if the social network allows it and may make mentions to the user in their own publications. The personal information that can be collected through these systems will be treated according to the conditions established above. THE RESPONSIBLE, is not responsible for the content shared in their profiles by other users, which must be original and not threaten the intellectual, industrial, the right to honor and image, in addition to complying with the guidelines established by each of the social networks. Insults, humiliations, disparagements and other offensive manifestations towards other users will not be allowed. THE RESPONSIBLE, reserves the right to suppress these publications and, if considered, request the blocking or expulsion of the user.

**Rights of the User:**

Right to withdraw consent at any time.

Right of access, rectification, portability and erasure of your data and the restriction or objection to their processing.

You have the right to file a complaint with the Spanish Supervisory Authority {agpd.es} if you consider that the processing does not comply with current legislation.

**Contact information for exercising your rights:**

Postal address: C/ Gremi Velluters 21, 07009 Palma {Illes Balears}

Email: [saintmichel@saintmichel.net](mailto:saintmichel@saintmichel.net)

**2. OBLIGATORY OR OPTIONAL CHARACTER OF THE INFORMATION PROVIDED BY THE USER**

Users, by marking the corresponding boxes and entering data in the fields, marked with an asterisk {\*} in the contact form or presented in download forms, expressly and freely and unequivocally accept that their data is necessary to meet the request, by the provider, being voluntary the inclusion of data in the remaining fields. The User guarantees that the personal data provided to the RESPONSIBLE person is true and is responsible for communicating any modification of them.

The RESPONSIBLE informs and expressly guarantees users that their personal data will not be transferred in any case to third parties, and that whenever they make any kind of transfer of personal data, the express, informed and unequivocal consent of the Users will be requested in advance. All data requested through the website are mandatory, as they are necessary for the provision of an optimal service to the User. In case all the data is not provided, it is not guaranteed that the information and services provided will be completely adjusted to your needs.

**3. SECURITY MEASURES**

According with the provisions of current regulations on personal data protection, the RESPONSIBLE is complying with all the provisions of the regulations RGPD and LOPD for the treatment of personal data of their responsibility, and manifestly with the principles described in the article 5 of the RGPD and in article 4 of the LOPD, by which they are treated in a lawful, loyal and transparent manner in relation to the interested party and adequate, pertinent and limited to what is necessary in relation to the purposes for which they are treated.

The RESPONSIBLE ensures that it has implemented appropriate technical and organizational policies to apply the security measures established by the GDPR and the LOPD in order to



protect the rights and freedoms of the Users and has communicated the appropriate information so that they can exercise them.

#### **4. SAINT MICHEL HOTELS GROUP**

The group is made up of Colduronline S.L. B16513814, Explotadora Arenal S.A.U. A07133952, Coldur S.L. B57277246, Servicios de Gestión y Mantenimiento Hotelero S.L. B07629447, Explotaciones Turísticas Sa Coma S.L. B57042186, Exma S.A. A07226350, Hotel Manacor S.L. B07911522, Promociones Turísticas Aucanada S.A. A07165780, Hotel Bonavida S.L. B07024649, Sec S.L. B07123920, Lidal S.L. B07098841 and Broher S.L.U. B07021496, all of them with the same tax office in C / Gremi Velluters 21 07009 Palma, Illes Balears.