

# **PRIVACY POLICY**

In accordance with the provisions of the General Data Protection Regulation GDPR (EU) 679/2016 and Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights, you are provided with the following information on the processing of your personal data.

## **Who controls the processing of your personal data?**

**Data Controller and Data Protection Officer:** SUMMUM HOTEL GROUP , as a brand, encompasses the following companies that may act as data controllers for your personal data if you have contracted services or maintain a commercial, business, or contractual relationship with the following hotel establishments:

**Summum H.Management, S.L. with V.A.T. No: B75691253 is the data controller for the following hotel establishments:**

**Summum** Hotel LJS Ratxó Collectio C/ Son Net, s/n Puigpunyent 07194 Puigpunyent

**Summum** Hotel Melià Aigua Blava, Carrer de Francesc Sabater "Xiquet", 7 Bloque D 17255 Begur

**Summum** Belle Marivent Mediterranean Petit Hotel C/ Joan Miró, 250 Palma 07015 Palma de Mallorca

**Summum** Villa Nazules Crta Almonacid a Chueca, s/n Almonacid de Toledo 45420 Toledo

**Summum** Belle Playa de Palma Apartsuites C/ Samil, 33 Playa de Palma 07610 Palma de Mallorca

**Summum** Son Más Aptdo correos 346 Porto Cristo 07680 Porto Cristo

**Fonamenta Capital S.A. with V.A.T. No: A07221419 is the data controller for the following hotel establishments:**

**Summum** Joan Miró Museum C/ Bartomeu Fons, 8 Palma 07015 Palma de Mallorca

Summum Prime Boutique Hotel Member of Melia Collection C/ Concepción, 26 Palma 07012 Palma de Mallorca

**Summum** Hotel Zurbarán C/ Josep Villalonga, 16 Palma 07014 Palma de Mallorca

**Summum** Virrey Finca Hotel Crta. Inca - Sencelles, Km. 2,4 Inca 07300 Inca

**Summum** Boutique San Roc 4 & Spa C/ Sant Roc, 2 Maó 07701 Maó

**Playa Mondragó SL with V.A.T. No: B07314677 is the data controller for the following hotel establishments:**

**Summum** Hotel Playa Mondragó Cala Mondragó, s/n Santanyí 07691 Mallorca

**Sidehoteles, S.L., with V.A.T. No: B57512642 is the data controller for the following hotel establishments:**

BQ Apolo en C/ Miquel Massuti, 28 Can Pastilla Cp 07610 Palma de Mallorca Islas Baleares

BQ Augusta C/ Corb Marí, 22, Palma (Bonanova) Cp 07015 - Palma de Mallorca Islas Baleares

BQ Belvedere C/ Mitja Lluna ,4, San Agustín Cp 07015 - Palma de Mallorca Islas Baleares

BQ Paguera Boutique Hotel C/ Palmira, 29, Peguera. Cp 07160 - Calviá. Mallorca.

BQ Bulevar Peguera C/ Eucalipto, 15, Peguera, Cp 07160- Calviá Mallorca Islas Baleares

BQ Andalucía Beach C/ Paseo Marítimo de Poniente, s/n Cp 29740 Vélez Málaga

BQ Delfín Azul C/ Fotja, 1, Cp 07400 Puerto de Alcudia Mallorca

BQ Aguamarina Boutique C/ San Antonio de la Playa, 41 Cp 07610 C'an Pastilla Mallorca

BQ Cala Ratjada C/ Floreal, 30, Cp 07590 Cala Ratjada, Capdepera Mallorca

**Xema, S.A., with V.A.T. No: A07101256 is the data controller for the following hotel establishments:**

BQ Amfora Beach C/ Volantí, 9 C'an Pastilla Cp 07610 - Palma de Mallorca

BQ Carmen Playa C/ Ferran Alzamora,32, Platja de Palma Cp 07600 Palma de Mallorca

**Hotel Sarah, S.L., with V.A.T. No: B57833865 is the data controller for the following hotel establishments:**

BQ Ca'n Picafort C/ Arenal, 24 Ca'n Picafort Cp 07458 Santa Margarita Mallorca

BQ Sarah C/ Avenida Diagonal, 6 Ca'n Picafort Cp 07458 Santa Margarita Mallorca

**Muro Club, S.L., (Tax ID/VAT Number): B07303167 is the data controller for the following hotel establishments:**

BQ Alcudia Sun Village C/ Circuit del Llac, 60, Platja de Muro Cp. 07408 – Muro Mallorca

**Furthermore, Sidehoteles, S.L., manages this website and processes the personal data obtained or processed through this website.**

With registered Address at C/FRAY JUNÍPERO SERRA N° 5 07014 PALMA DE MALLORCA, BALEARES, Telephone: 971707755, email address: lopdp@summumhg.com. You can contact the data protection officer at the following Email Address: DATA PROTECTION OFFICER: CONTACT: / Http://www.protecmir.Com / E-MAIL: protecmirlegal@protecmir.com.

**Regarding the privacy policy of the hotel establishments under THE R2 BRAND AND THE 1881 TRADEMARK, is available on the following websites:**

Privacy Policy of the hotel establishments under the R2h brand: <https://www.r2hotels.com/>

Privacy Policy of the hotel establishments under the 1881 brand: [https://www.1881barcelonarosellonhotel.com/](https://www.1881barcelonarosellonhotel.com/www.hotelbalearnearivichycatalan.com/es/)  
[www.hotelbalearnearivichycatalan.com/es/](http://www.hotelbalearnearivichycatalan.com/es/) [4-star 1881 Madrid Ventas Hotel | Official Website](http://www.4-star-1881-madrid-ventas-hotel.com/)

## **What data do we process?**

At SUMMUM HOTEL GROUP we process the personal data that you provide by filling in the forms provided for this purpose on this website, as well as any personal data resulting from the provision or contracting of our services or products and/or any personal data resulting from the commercial relationship that you have with us. In addition, we process the personal data generated by your activity on our website, which includes your browsing data obtained through the website.

It is important for us to keep the record of your personal data up to date. You are obliged to keep us informed of any changes or errors in your personal data as soon as possible by contacting us by email: LOPD@BQHOTELES.COM.

## **What do we process your personal data for?**

**Purpose:** Your personal data is processed for the following purposes:

- Managing and maintaining the services provided through the website.
- Managing and servicing queries and requests for information made by users through the contact form. The email address and personal data that you provide us with through the contact form on the website will be used exclusively to deal with the queries that you send us by this means.
- Compliance with applicable legal obligations.
- Sending commercial communications and newsletters, and advertising our services and products.
- Managing the contracting of our services and/or products.

- Managing requests for information or requests for quotations for our services or products.
  - Conducting surveys to improve our services.
  - Registration in the user area.
  - Receiving and managing your curriculum vitae in order to participate in the organisation's staff selection processes.
  - Managing participation in activities and competitions held by the organisation.
  - Managing the members' club.
  - Handling and processing of complaints submitted through the internal complaints channel.
- If you have given your consent and in order to be able to offer you services relating to your interests, your personal data may be used to draw up a commercial profile. No automated decisions will be made based on said profile.

### **How long will we keep your personal data?**

We keep your personal data in our systems and files for as long as is needed to carry out the purposes of the processing, and to comply with applicable legislation. Your personal data will be kept for as long as there is a contractual and/or commercial relationship with you, or as long as you do not exercise your right to the deletion and/or restriction of processing of your data. The length of time for which personal data is kept will vary depending on the purposes of the processing, and in general terms:

- The personal data that you provide when contracting our services or products will be kept for the duration of the contractual relationship and, once said relationship has ended, for the legally mandated period of time with regard to any legal actions arising from said relationship.
- The personal data you provide in order for us to manage requests for information or queries through the contact form will be kept as long as you do not request for said data to be erased or cancelled.
- The personal data you provide to subscribe to our newsletter or bulletins will be kept as long as you do not request its deletion, indicate your opposition and/or request its limitation.
- The personal data obtained from your browsing and consumption habits, as well as the commercial profile obtained, will be kept as long as you do not request its deletion or cancellation.
- The personal data you provide to participate in our activities and contests will be kept as long as you do not request its deletion or cancellation.
- The personal data you provide to us by sending us your curriculum vitae will be kept for a period of no more than one year.
- The personal data that you provide through the complaints channel will be held for a period not exceeding three months.

Your personal data will be kept for as long as it is useful for the purposes indicated and, in any case, for legally mandated periods and for length of time necessary to address any possible liabilities arising from the processing of said data.

### **Data security**

We have appropriate technical and organisational security measures in place to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, and to ensure the integrity and confidentiality of your personal data. The technical and organisational security measures implemented make it possible to: guarantee the permanent confidentiality, integrity, availability and resilience of the processing systems and services; restore the availability of and access to personal data promptly in the event of a physical or technical incident; and regularly verify, evaluate and assess the effectiveness of the technical and organisational measures implemented to ensure the security of the processing.

These technical and organisational security measures have been designed taking into account our IT infrastructure, the state of the art in accordance with current standards and practices, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity of the processing to your personal data.

### **What is the legitimacy for the processing of your data?**

**Legitimacy:** The legitimacy to process your personal data is based on:

-Executing and maintaining a contractual and commercial relationship with you, such as contracting the organisation's products and services, and managing and processing requests for quotes for the organisation's products and/or services, all in accordance with the provisions of Article 6.1.B of GDPR (EU) 679/2016 and Organic Law 3/2018, of 5 December (LOPDPGDD).

-Your express consent for one or more purposes, such as sending you our own or third-party advertising communications or newsletters, managing how curricula vitae are sent, and taking part in activities or competitions, all in accordance with the provisions of article 6.1.A of GDPR (EU) 679/2016 and Organic Law 3 /2018, of 5 December (LOPDPGDD ).

-Compliance with various legal obligations, all in accordance with the provisions of Article 6.1.C of GDPR ( EU ) 679/2016 and Organic Law 3/2018, of 5 December (LOPDPGDD ).

-Meeting the legitimate interests pursued by the data controller or by a third party, e.g. for security reasons, to improve our services and/or to manage requests or queries.

During the data collection process, and in each place on the website where personal data is requested, the user will be informed by means of a hyperlink or by the inclusion of appropriate mentions on the form itself of the mandatory nature or otherwise of the collection of their personal data.

The personal data requested in the forms on the website are, in general, mandatory (unless otherwise specified in the required field) in order to comply with the established purposes. Therefore, if the personal data requested is not provided, or is not provided correctly, the request cannot be fulfilled.

There is an obligation to provide your personal data when contracting a service or product, and/or when requesting a quote or offer.

The sending of advertising communications, newsletters or bulletins about our products and services is based on the consent that you are asked for, and under no circumstances does the withdrawal of this consent affect the contractual or commercial relationship that you have with us.

If you have authorised us to send advertising for our services and products, your personal data may be used to manage the sending of advertising offers and newsletters by electronic means. In these cases, the provisions of articles 20 and 21 of Law 34/2002, of 11 July 2002, on information society services and electronic commerce, apply to the use and processing of your personal data for the purpose of sending advertising by electronic means.

If you have ticked the option to receive advertising, or if you have subscribed to our newsletter, you can cancel this option at any time.

**With which recipients will your data be shared? Recipients:** In general, your personal data will not be shared with any third party outside the organisation, unless there is a legal obligation to do so. However, you are informed that third-party providers may have access to your personal information as data processors in the context of providing a service for the data controller organisation. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. (tax code): B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 ,and Fonamenta Capital S.A. with V.A.T. No: A07221419. In addition to the above, the organisation may transfer or communicate personal data in order to fulfil its obligations to the Public Administrations in cases where this is required, in accordance with the legislation in force

#### **What rights do you have in the processing of your personal data?**

**Your rights:** You have the right to obtain access to your personal data, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer necessary for the purposes for which it was obtained. In certain circumstances, you may request that the processing of your data be limited, in which case we will only retain it for the purpose of filings or defending complaints. Additionally, and for purposes related to your particular situation, you may oppose the processing of your data, in which case your personal information will no longer be processed for those purposes to which you have stated your opposition. Where technically possible, you may request the portability of your data to another data controller. To exercise these rights, in accordance with current legislation, you can send a letter by post, enclosing a copy of a document proving your identity (DNI), to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO

SERRA N° 5, CP: 07014, PALMA DE MALLORCA or send an email to [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You have the right to lodge a complaint with the supervisory authority: Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

You expressly accept the inclusion of the personal data collected while browsing the website and/or provided by filling in any forms, as well as any data resulting from a possible commercial relationship, in the organisation's automated personal data files.

The organisation guarantees the confidentiality of users' personal data. However, when required to do so, the organisation will disclose personal data to the relevant public authorities, along with any other information in its possession or which is accessible through its systems, in accordance with the legal and regulatory provisions applicable to each case. Personal data may be kept in the files owned by SUMMUM HOTEL GROUP even after the commercial relations formalised through the organisation's website have ended, solely for the purposes indicated above and, in any case, for the legally established periods, at the disposal of administrative or judicial authorities.

### **Use of social media**

When you interact with our website through various social media platforms, such as when you connect to or follow us or share our content on social media platforms (Facebook, Twitter, LinkedIn, Instagram or others), we may receive information from these platforms, including information about your profile, user ID associated with your social media account, and any other public information that you allow to be shared with third parties on said platforms.

The organisation uses social media as a way to provide information about the services it offers, as well as any other activity or event that it carries out and wishes to publicise, but at no time will it obtain personal data from users interacting on said social media platforms, unless there is express authorisation to do so.

This data is only used within the social media platform itself and is not incorporated into any processing system.

Social media platforms have their own terms of use and privacy policies that you are obliged to take into account and observe if you use them.

In cases of registration and/or access through a social media account, the organisation may collect and access certain information from your user profile on said platform, solely for the purposes indicated above.

**Below we will provide you with information regarding the processing of your personal data carried out by SUMMUM HOTEL GROUP**

SUMMUM HOTEL GROUP as a brand encompasses the following companies that may act as controllers of your personal data if you have contracted services or maintain a commercial, business, contractual or employment relationship with the following hotel establishments;

**Summum H.Management, S.L. with V.A.T. No: B75691253 is the data controller for the following hotel establishments:**

**Summum** Hotel LJS Ratxó Collectio C/ Son Net, s/n Puigpunyent 07194 Puigpunyent

**Summum** Hotel Melià Aigua Blava, Carrer de Francesc Sabater "Xiquet", 7 Bloque D 17255 Begur

**Summum** Belle Marivent Mediterranean Petit Hotel C/ Joan Miró, 250 Palma 07015 Palma de Mallorca

**Summum** Villa Nazules Crta Almonacid a Chueca, s/n Almonacid de Toledo 45420 Toledo

**Summum** Belle Playa de Palma Apartsuïtes C/ Samil, 33 Playa de Palma 07610 Palma de Mallorca

**Summum** Son Más Aptdo correos 346 Porto Cristo 07680 Porto Cristo

**Fonamenta Capital S.A. with V.A.T. No: A07221419 is the data controller for the following hotel establishments:**

**Summum** Joan Miró Museum C/ Bartomeu Fons, 8 Palma 07015 Palma de Mallorca

Summum Prime Boutique Hotel Member of Melia Collection C/ Concepción, 26 Palma 07012 Palma de Mallorca

**Summum** Hotel Zurbarán C/ Josep Villalonga, 16 Palma 07014 Palma de Mallorca

**Summum** Virrey Finca Hotel Crta. Inca - Sencelles, Km. 2,4 Inca 07300 Inca

**Summum** Boutique San Roc 4 & Spa C/ Sant Roc, 2 Maó 07701 Maó

**Playa Mondragó SL with V.A.T. No: B07314677 is the data controller for the following hotel establishments:**

**Summum** Hotel Playa Mondragó Cala Mondragó, s/n Santanyí 07691 Mallorca

**Sidehoteles, S.L., with V.A.T. No: B57512642 is the data controller for the following hotel establishments:**

BQ Apolo en C/ Miquel Massuti, 28 Can Pastilla Cp 07610 Palma de Mallorca Islas Baleares

BQ Augusta C/ Corb Marí, 22, Palma (Bonanova) Cp 07015 - Palma de Mallorca Islas Baleares

BQ Belvedere C/ Mitja Lluna ,4, San Agustín Cp 07015 - Palma de Mallorca Islas Baleares

BQ Paguera Boutique Hotel C/ Palmira, 29, Peguera. Cp 07160 - Calviá. Mallorca.

BQ Bulevar Peguera C/ Eucalipto, 15, Peguera, Cp 07160- Calviá Mallorca Islas Baleares

BQ Andalucía Beach C/ Paseo Marítimo de Poniente, s/n Cp 29740 Vélez Málaga

BQ Delfín Azul C/ Fotja, 1, Cp 07400 Puerto de Alcudia Mallorca

BQ Aguamarina Boutique C/ San Antonio de la Playa, 41 Cp 07610 C'an Pastilla Mallorca

BQ Cala Ratjada C/ Floreal, 30, Cp 07590 Cala Ratjada, Capdepera Mallorca

**Xema, S.A., with V.A.T. No: A07101256 is the data controller for the following hotel establishments:**

BQ Amfora Beach C/ Volantí, 9 C'an Pastilla Cp 07610 - Palma de Mallorca

BQ Carmen Playa C/ Ferran Alzamora,32, Platja de Palma Cp 07600 Palma de Mallorca

**Hotel Sarah, S.L., with V.A.T. No: B57833865 is the data controller for the following hotel establishments:**

BQ Ca'n Picafort C/ Arenal, 24 Ca'n Picafort Cp 07458 Santa Margarita Mallorca

BQ Sarah C/ Avenida Diagonal, 6 Ca'n Picafort Cp 07458 Santa Margarita Mallorca

**Muro Club, S.L., (Tax ID/VAT Number): B07303167 is the data controller for the following hotel establishments:**

BQ Alcudia Sun Village C/ Circuit del Llac, 60, Platja de Muro Cp. 07408 – Muro Mallorca

With registered Address at C/FRAY JUNÍPERO SERRA N° 5 07014 PALMA DE MALLORCA, BALEARES, Telephone: 971707755, email address: lopd@bqhoteles.com or lopdp@summumhg.com. You can contact the data protection officer at the following Email Address: DATA PROTECTION OFFICER: CONTACT: / Http://www.protecmir.Com / E-MAIL: protecmirlegal@protecmir.com

**Regarding the privacy policy of the hotel establishments under THE R2 BRAND AND THE 1881 TRADEMARK, is available on the following websites:**

Privacy Policy of the hotel establishments under the R2h brand: <https://www.r2hotels.com/>

Privacy Policy of the hotel establishments under the 1881 brand: [https://www.1881barcelonarosellonhotel.com/  
www.hotelbalnearivichycatalan.com/es/](https://www.1881barcelonarosellonhotel.com/www.hotelbalnearivichycatalan.com/es/) [4-star 1881 Madrid Ventas Hotel | Official Website](#)

## INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF CUSTOMERS RESERVATIONS

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419.Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. . Muro Club, S.L., with V.A.T. No.: B07303167. . Address: C/ Fray Junípero Serra Nº5, 07013, Palma de Mallorca, Balears. Email: [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We At SUMMUM HOTEL GROUP , process the information you provide us in order to provide you accommodation in our hotel and/or the services of our establishments, in addition to managing the sending of information and commercial research and invoicing thereof. We will develop a commercial profile based on the information provided in order to be able to offer you our services in accordance with your interests. No automated decisions will be made based on this profile. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or make any reservation. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract; we are also obliged to process your personal information to comply with a legal obligation that applies to the data controller. In any event, you have given your consent for your personal information to be processed for one or more specific purposes, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (Art. 6.1. A. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: (LOPDGDD). . Act 1/1992, modified by Organic Law 4/2015 of 30 March on the Protection of Public Safety, shall apply. Royal Decree 933/2021, of 26 October, which establishes the documentary registration and information obligations of natural or legal persons who carry out accommodation and motor vehicle rental activities, is applicable. Organic Law 7/2021, of 26 May, on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offences and the execution of criminal sanctions also applies. Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase and/or provision of the service under any circumstances. The personal data must be provided, otherwise the hotel accommodation service and/or the requested offer cannot be provided. While the prospective offer of products and services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase of any product and/or service under any circumstances.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors or joint controllers of the processing, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. In addition to the above, your personal data will be communicated to the Secretary of State for Security and may only be processed by the Security Forces and/or the corresponding authorities. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. In addition to the above, your personal data will be communicated to the Secretary of State for Security and may only be processed by the Security Forces and/or the corresponding authorities. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA Nº 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF CUSTOMER SATISFACTION SURVEY

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419. Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. ., Muro Club, S.L., with V.A.T. No.: B07303167. , Address: C/ Fray Junípero Serra Nº5, 07013, Palma de Mallorca, Baleares. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** At SUMMUM HOTEL GROUP , we process the information you provide us in order to know your level of satisfaction for your stay at our establishment. We will develop a commercial profile based on the information provided in order to be able to offer you our products and services in accordance with your interests. No automated decisions will be made based on this profile. We keep your personal data in our systems and files for as long as is needed to carry out the purposes of the processing, and to comply with applicable legislation. Your personal data will be kept for as long as there is a contractual and/or commercial relationship with you, or as long as you do not exercise your right to the deletion and/or restriction of processing of your data.

**LEGAL BASIS:** Personal data processing is based on your consent for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase and/or provision of the service under any circumstances. Personal data must be provided or otherwise the satisfaction survey cannot be completed. The personal data must be provided, otherwise the requested offer cannot be provided. Consent must be provided in order to be able to make prospective offers and send you commercial information.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA Nº 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF WEBSITE USERS**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419. Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. ., . Muro Club, S.L., with V.A.T. No.: B07303167. ., Address: C/ Fray Junípero Serra Nº5, 07013, Palma de Mallorca, Balears. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We at SUMMUM HOTEL GROUP process the information that you provide us with in order to provide the services and/or sell the products that you have contracted through our website and to manage the sending of information and commercial research. We will develop a commercial profile based on the information provided in order to be able to offer you our services in accordance with your interests. No automated decisions will be made based on this profile. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or purchase anything. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract, and in any event you have given your consent for your personal information to be processed for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A. B) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of products and services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase of any product and/or service under any circumstances. The personal data must be provided, otherwise the service requested cannot be provided and/or the product sold and/or the requested offer cannot be provided and the sending out of commercial information cannot be managed.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419 In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA Nº 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF INVOICES / ACCOUNTING**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419.Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. ., . Muro Club, S.L., with V.A.T. No.: B07303167. . , Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Balears. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** At SUMMUM HOTEL GROUP we process the information that you provide us with in order to prepare and produce the invoices for products and/or services and in order to comply with tax and accounting obligations. The personal data provided will be retained for the duration of the commercial relationship and as long as no request has been received to delete the same by the interested party, for a duration of 5 years from the last time you contract and/or purchase anything. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract. We are also obliged to process your personal information to comply with a legal obligation that applies to the data controller, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (Art. 6.1. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: ( LOPDPGDD ).

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF CURRICULUM VITAE**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419. Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. ., . Muro Club, S.L., with V.A.T. No.: B07303167. ., Address: C/ Fray Junípero Serra Nº5, 07013, Palma de Mallorca, Balears. Email: [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** At SUMMUM HOTEL GROUP we process the information You provide us with in order to select staff and to allow the applicant to participate in the company's employment selection process. While the relationship with the company remains in effect and no request for cancellation is made, the personal information provided will be retained for a period of one year after the last time your consent was obtained. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on your consent for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (Art. 6.1. A) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). The personal data must be provided, otherwise you may not participate in the Company's selection process.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA Nº 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF SUPPLIERS

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419.Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. . . Muro Club, S.L., with V.A.T. No.: B07303167. , Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Balears. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We at SUMMUM HOTEL GROUP process the information that you provide us with in order to complete the order and invoice the services. While the commercial relationship remains in effect and no request for cancellation is made, the personal information provided will be retained for a period of 5 years after the last contract has been formalised. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract, in accordance with the provisions of the GDPR EU 679/2016 ( ART. 6.1. B) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: (LOPDPGDD ).

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF NEWSLETTER / MAILING**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419. Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. . . Muro Club, S.L., with V.A.T. No.: B07303167. , Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Balears. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** At SUMMUM HOTEL GROUP we process the information that you provide with the purpose of sending you personalised offers and/or services provided by the company, and to manage the sending of information and marketing surveys. We also process information on customers who have contracted our products and services with the purpose of sending them personalised offers and/or services provided by the company. We will develop a commercial profile based on the information provided in order to be able to offer you our products and services in accordance with your interests. No automated decisions will be made based on this profile. The personal information provided will be retained for as long as your explicit consent remains in effect and you do not request for it to be removed. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract, and in any event you have given your consent for your personal information to be processed for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A.B) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF VIDEO SURVEILLANCE**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419.Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. . Muro Club, S.L., with V.A.T. No.: B07303167. , Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Balears. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** At SUMMUM HOTEL GROUP we process the information obtained via video surveillance cameras for the purpose of ensuring the safety of persons and property, and the security of the facilities or establishment. It is also for the purpose of monitoring access to the establishment and facilities of the Company or Organisation. The personal information provided will be retained for a period of no more than 1 month following its recording. In any event, your personal information will be retained while it remains useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** The processing of your personal data is based on the need to meet legitimate interests pursued by the data controller or by a third party in accordance with the provisions of the GDPR EU 679/2016 (Art. 6.1. F) and Organic Law 3/2018 of 5 December ( Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 22 and 89 of Organic Law 3/2018, of 5 December, on Personal Data Protection and Guarantee of Digital Rights, shall apply. Article 20.3 of the Employment Rights Act shall also apply.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that, as data processors, third-party providers may have access to your personal data as part of the provision of a service for the data controller company. You are informed that images may be processed by the Data Processor in accordance with article 28 of the GDPR. You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679 In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. In addition to the above, your data may be transferred to the State Security Forces and Corps. There is no arrangement in effect to transfer your data to third-party countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopd@summumhg.com](mailto:lopd@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF MEMBERS' CLUB**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419. Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. ., . Muro Club, S.L., with V.A.T. No.: B07303167. ., Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Balears. Email: [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We at SUMMUM HOTEL GROUP process the information you provide us with in order to manage your membership of the Members' Club. We also do this so that it is easier for you to obtain benefits as a member, so that you can receive personalised [commercial] offers and so that you can receive notifications of reductions in the price of our services. We will develop a commercial profile based on the information provided in order to be able to offer you our products and services in accordance with your interests. No automated decisions will be made based on this profile. We keep your personal data in our systems and files for as long as is needed to carry out the purposes of the processing, and to comply with applicable legislation. Your personal data will be kept for as long as there is a contractual and/or commercial relationship with you, or as long as you do not exercise your right to the deletion and/or restriction of processing of your data.

**LEGAL BASIS:** Personal data processing is based on your consent for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase and/or provision of the service under any circumstances.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopdp@bqhoteles.com](mailto:lopdp@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF PRIZE DRAWS**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419. Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. , . Muro Club, S.L., with V.A.T. No.: B07303167. , Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Baleares. Email: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com).

**PURPOSE:** We at SUMMUM HOTEL GROUP process the information you provide us with so that you can take part in the prize draws, competitions and activities organised by the entity. We will develop a commercial profile based on the information provided in order to be able to offer you our products and services in accordance with your interests. No automated decisions will be made based on this profile. We keep your personal data in our systems and files for as long as is needed to carry out the purposes of the processing, and to comply with applicable legislation. Your personal data will be kept for as long as there is a contractual and/or commercial relationship with you, or as long as you do not exercise your right to the deletion and/or restriction of processing of your data.

**LEGAL BASIS:** Personal data processing is based on your consent for one or more specific purposes, in accordance with the provisions of the GDPR EU 679/2016 (ART. 6.1. A) and Organic Law 3/2018 of 5 December (Data Protection and Guarantee of Digital Rights: LOPDPGDD). Articles 20 and 21 of the Information Society Services Act 34/2002, for the use of telecommunications to send commercial offers, shall apply. While the prospective offer of services is based on the consent you are requested to provide, the withdrawal of this consent will not condition the contract for the purchase and/or provision of the service under any circumstances.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679. Furthermore, if you agree, your data will be processed by the companies belonging to SUMMUM HOTEL GROUP: Hotel Sarah, S.L., with V.A.T. No: B57833865, Sidehoteles, S.L., with V.A.T. No: B57512642, Xema, S.A., with V.A.T. No: A07101256, Muro Club, S.L., with V.A.T. No: B07303167, Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677 and Fonamenta Capital S.A. with V.A.T. No: A07221419. In addition to the above, the company may share or communicate personal data in order to meet its obligations with public administrations when required to do so by law. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **INFORMATION SECTION ON ARTICLES 13 AND 14 OF THE GDPR ON THE PROCESSING OF THE PERSONAL DATA OF PASSENGER REGISTRATION PART.**

In accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights, you are provided with the following information on how your personal data is processed:

**RESPONSIBLE / MANAGER** Summum H.Management, S.L. with V.A.T. No: B75691253, Playa Mondragó SL with V.A.T. No: B07314677, Fonamenta Capital S.A. with V.A.T. No: A07221419.Hotel Sarah, S.L., with V.A.T. No.: B57833865, Sidehoteles, S.L., with V.A.T. No.: B57512642. Xema, S.A., with V.A.T. No.: A07101256. ., . Muro Club, S.L., with V.A.T. No.: B07303167. , Address: C/ Fray Junípero Serra N°5, 07013, Palma de Mallorca, Balears. Email: lopd@bqhoteles.com or lopdp@summumhg.com. Data Protection Officer: CONTACT: <http://www.protecmir.com> / Email: [protecmirlegal@protecmir.com](mailto:protecmirlegal@protecmir.com). **PURPOSE:** We At SUMMUM HOTEL GROUP , process the information you provide us with in order to provide you with the requested hotel accommodation service and to comply with the documentary and information registration obligations set forth in Royal Decree 933/2021, of 26 October, for companies that carry out accommodation and hotel accommodation activities. No automated decisions will be made based on this profile. The data that you provide us with and that we process in a digital register must be kept for a minimum period of three years from the end of the service or provision contracted. In any event, your personal data will be retained while they remain useful for the purpose indicated, and in any event for the legally established periods and for the time needed to address any possible liabilities resulting from said processing.

**LEGAL BASIS:** Personal data processing is based on the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract. We are also obliged to process your personal information to comply with a legal obligation that applies to the data controller, in accordance with the provisions of the General Data Protection Regulation GDPR EU 679/2016 (Art. 6.1. B. C) and Organic Law 3/2018 of 5 December on Data Protection and Guarantee of Digital Rights: (LOPDPGDD).Royal Decree 933/2021, of 26 October, which establishes the documentary registration and information obligations of natural or legal persons who carry out accommodation and motor vehicle rental activities, is applicable. Organic Law 7/2021, of 26 May, on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offences and the execution of criminal sanctions also applies. The personal data must be provided, otherwise the hotel accommodation service cannot be provided.

**RECIPIENTS:** No personal data will be shared with any third party not connected to the company, unless it is a legal requirement to do so. However, you are informed that third-party providers may have access to your personal data, as data processors, within the framework of the provision of a service for the Data Controller company. You are informed that you can request a complete list of the recipients that may receive your personal data as processors or as third-party recipients transfer by emailing: [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com). You are informed that SUMMUM HOTEL MANAGEMENT S.L. with V.A.T. No B75691253 shall act in all circumstances as data processors in the terms set out in article 28 of the General Data Protection Regulation (GDPR) Regulation (EU) 2016/679..Your personal data will be communicated to the Secretary of State for Security and may only be processed by the Security Forces and/or the corresponding authorities. No data is expected to be transferred to third countries.

**RIGHTS:** Interested parties have the right to obtain access to their personal information, as well as to request that any inaccurate data be rectified or, where appropriate, to request the removal of said data when, among other reasons, the information is no longer needed for the purposes for which it was obtained. In certain circumstances, interested parties may request that the processing of their data be limited, in which case we will only retain it for the purpose of filing or defending complaints. Additionally, and for purposes related to their particular situation, interested parties may oppose the processing of their data, in which case their personal information will no longer be processed for those purposes to which they have stated their opposition. When technically possible, the interested party may request the portability of their data to another Data Controller. To exercise these rights, in accordance with current legislation, the parties concerned may write to SUMMUM HOTEL GROUP at C/FRAY JUNÍPERO SERRA N° 5, CP: 07014 PALMA DE MALLORCA, enclosing a copy of a document accrediting their identity (national identity document), or email [lopd@bqhoteles.com](mailto:lopd@bqhoteles.com) or [lopdp@summumhg.com](mailto:lopdp@summumhg.com) You have the right to file a complaint with the Regulatory Authority: The Spanish Agency for Data Protection ([www.agpd.es](http://www.agpd.es)). Origin of personal data: the data subject.

## **Data security**

We have appropriate technical and organisational security measures in place to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction or damage, and to ensure the integrity and confidentiality of your personal data. The technical and organisational security measures implemented make it possible to: guarantee the permanent confidentiality, integrity, availability and resilience of the processing systems and services; restore the availability of and access to personal data promptly in the event of a physical or technical incident; and regularly verify, evaluate and assess the effectiveness of the technical and organisational measures implemented to ensure the security of the processing.

These technical and organisational security measures have been designed taking into account our IT infrastructure, the state of the art in accordance with current standards and practices, the cost of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity of the processing to your personal data.