

## PRIVACY POLICY AND DATA PROTECTION

### OWNERSHIP

In compliance with article 10 of Law 34/2002, of July 11, Services of the Information Society and Electronic Commerce, it is stated:

Who is responsible for the processing of your data?

Name: BETICA TRAVEL S.A.

CIF: A29090164

Address: Avda Salvador Allende, 31 29620 Torremolinos MALAGA

Phone: 952376794

Email: [info@beticatravel.es](mailto:info@beticatravel.es)

Website: [www.beticatravel.com](http://www.beticatravel.com)

You can contact us in any way to communicate with us.

### BASIC DATA PROTECTION INFORMATION

Purpose: Travel management, marketing and contracting.

Legitimation: Execution of a contracted service, consent of the interested party / legal representative and compliance with a legal obligation.

Recipients: No data will be transferred to third parties, except legal obligation.

Communications: Sending operational and commercial communications through different means (telephone, SMS, email, ordinary or other equivalent).

Rights: Access, rectification, opposition, portability, limitation of data and cancellation.

We reserve the right to modify or adapt this Privacy Policy at any time. We recommend you to review it, and if you have registered and access your account or profile, you will be informed of the changes.

### 1. CONTACTS OF THE WEB OR EMAIL

What data do we collect through the Web?

We can treat your IP, what operating system or browser you use, and even the duration of your visit, anonymously.

If you provide us with information in the contact form, you will identify yourself in order to contact you, if necessary.

For what purposes we will treat your personal data?

Answer your questions, requests or requests.

Manage the requested service, answer your request, or process your request.

Information by electronic means, that relate to your request.

Commercial information or events by electronic means, as long as there is express authorization.

Perform analysis and improvements on the Web, about our products and services.

Improve our commercial strategy

What is the legitimacy for the treatment of your data?

The acceptance and consent of the interested party: In those cases where to complete an application it is necessary to fill in a form and click on the submit button, the completion of which will necessarily imply that you have been informed and have expressly granted your consent to the content of the clause annexed to said form or acceptance of the privacy policy.

All our forms have the symbol \* in the required data. If you do not provide these fields, or do not check the acceptance policy checkbox of the privacy policy, the sending of the information will not be allowed. It usually has the following formula: " I am over 14 years old and I have read and accept the Privacy and Data Protection Policy."

## 2. BULLETIN CONTACTS

What data do we collect through the newsletter?

When you sign up for our services, you provide us with an email address to which we can send you our newsletter.

We will only store your email in our database, and will proceed to send you emails periodically, until you request the cancellation, or stop sending emails. The reception of this newsletter does not affect the provision of our services.

You will always have the option to unsubscribe, in any communication.

With what purposes are we going to treat your personal data?

Manage the requested service

Information by electronic means, that relate to your request.

Commercial information or events by electronic means, as long as there is express authorization.

Perform analysis and improvements in mailing, to improve our business strategy.

What is the legitimacy for the treatment of your data?

Acceptance and consent of the interested party: In those cases where you subscribe, it will be necessary to accept a checkbox and click on the submit button. This will necessarily imply that you have been informed and have expressly granted your consent to receiving the newsletter.

If you do not check the acceptance policy of the privacy policy, the sending of the information will not be allowed. Normally it has the following formula:

"I am over 14 years old and I have read and accept the Privacy Policy."

### 3. CLIENTS

With what purposes are we going to treat your personal data?

Preparation of the budget and monitoring thereof by means of communications between both parties.

Information by electronic means, that relate to your request.

Commercial information or events by electronic means, as long as there is express authorization.

Manage the administrative, communications and logistics services performed by the Responsible.

Billing and declaration of the appropriate taxes.

Carry out the corresponding transactions.

Control and recovery management.

### 4. CONTACTS SOCIAL NETWORKS

With what purposes are we going to treat your personal data?

Answer your questions, requests or requests.

Manage the requested service, answer your request, or process your request.

Connect with you and create a community of followers.

What is the legitimacy for the treatment of your data?

The acceptance of a contractual relationship in the environment of the corresponding social network, and in accordance with its Privacy policies:

Facebook: <http://es-es.facebook.com/betica.travel>

Linkedin: <http://es.linkedin.com/betica-travel-s-a-agencia-de-viajes-520261104>

### 5. QUALITY SURVEYS

With what purposes are we going to treat your personal data?

- Assess the degree of quality in the service provided
- Improve the services offered, by virtue of compliance with our ISO

What is the legitimacy for the treatment of your data?

The legal basis is the express consent of the respondent.

## GENERAL INFORMATION PRIVACY POLICY AND DATA PROTECTION POLICY

The purpose of this "Privacy and Data Protection Policy" is to make known the General Conditions that govern the collection and processing of personal data through the [www.beticatravel.es](http://www.beticatravel.es) domain.

BETICA TRAVEL S.A. is the owner of this domain and has published this website to provide potential visitors with access to information regarding their solutions and services. The information displayed on the website is left to the free disposal of users who access the website in a particular and individual way, at no cost. The commercialization of the right of access is expressly prohibited.

It is expressly forbidden the total or partial copy or reproduction of the published information through any electronic support (web pages, databases or electronic publications) that allows the retransmission of any information published on this website to multiple users without the prior written consent of the owner.

## WHAT CHANNELS DO WE USE TO OBTAIN YOUR DATA?

BETICA TRAVEL S.A., obtains personal data directly from the interested person through the following channels:

- Email
- Formular forms / Questionnaires (Web, electronic or paper format)
- Exchange of business cards.
- Directly from those interested.

For what purpose do we treat your personal data?

The data that BETICA TRAVEL S.A. collects through the different channels (web page, email, electronic forms or forms and paper documents) within its activity, are treated with the following purposes:

- A) Manage and process any type of request for information in relation to the services we offer.
- B) Keep our clients and interested parties informed about our services, and about those topics that we consider to be of professional interest.
- C) Preparation of contracts (service contracts and employment contracts)
- D) Personnel selection processes for a job.

## ACCURACY OF INFORMATION

BETICA TRAVEL S.A. It puts the maximum effort in the accuracy and updating of the information published on its website. However, BETICA TRAVEL S.A. is not responsible for the consequences of reading it.

## SECURITY OF THE INFORMATION

BETICA TRAVEL S.A. Take all appropriate measures to protect unauthorized access or alteration, disclosure or destruction of information. This includes internal reviews of our information collection, storage and processing practices, as well as physical and logical security measures to protect from unauthorized access to the systems in which the information is stored.

All our staff has signed a confidentiality agreement and knows the data protection policy, and in the case of third parties that in compliance with a service may have access to the files with personal data responsibility of BETICA TRAVEL SA, this service will be regulated according to article 28 of the General Regulation of Data Protection UE 2016/679.

### DO WE INCLUDE PERSONAL DATA FROM THIRD PARTIES?

No, as a general rule we only treat the data provided by the owners. If you provide us with data from third parties, you must first inform and request your consent to said persons, or otherwise you will exempt us from any responsibility for the breach of this requirement.

### AND DATA OF MINORS?

We do not process data for children under 14 years of age. Therefore, the user must refrain from providing them if they are not that old or, if applicable, to provide data from third parties that do not have the aforementioned age. BETICA TRAVEL S.A. He is exempt from any responsibility for the breach of this forecast.

### WILL WE REALIZE COMMUNICATIONS BY ELECTRONIC MEANS?

They will only be made to manage your request, if it is one of the means of contact you have given us.

If we carry out commercial communications, they will have been previously and expressly authorized by you.

### WHAT CAN YOU DO IF YOU DO NOT WANT TO RECEIVE COMMERCIAL COMMUNICATIONS?

In accordance with the LSSSI may unsubscribe from any of the subscription services as well as express their opposition to receiving advertising information, by sending an email from the account to unsubscribe with the word "LOW" in the subject, to the following address : [BETICATRAVEL4@GRUPOAIRMET.COM](mailto:BETICATRAVEL4@GRUPOAIRMET.COM).

## WHAT RECIPIENTS WILL THEY COMMUNICATE YOUR DATA?

Your data will be kept under strict security measures that guarantee the confidentiality and security of them. In the same way, they will only be ceded to the entities and for the following purposes:

-Entities and suppliers that provide services to BETICA TRAVEL S.A. for the correct execution of our activities and projects. Said entities and suppliers are duly accredited and sign with us the corresponding data processing contract in compliance with the current data protection regulations.

To give examples of the services that we provide and that may involve the processing of your personal data on behalf of BETICA TRAVEL SA, we can mention, but not limited to: multidisciplinary professional services, legal advice, technological services, computer, messaging and distribution, maintenance, security and surveillance, advertising and marketing, call center etc ...

-Organisms and official entities in compliance with the regulations and laws in force. Any international transfer of data when using American applications, will adhere to the Privacy Shield agreement, which guarantees that American software companies comply with European data protection policies regarding privacy.

## WHAT RIGHTS DO YOU HAVE?

- To know if we are treating your data or not.
- To access your personal data.
- To request the rectification of your data if they are inaccurate.
- To request the deletion of your data if they are no longer necessary for the purposes for which they were collected or if you withdraw the consent granted.
  - To request the limitation of the treatment of your data, in some cases, in which case we will only keep them in accordance with current regulations.
  - To carry your data, which will be provided in a structured, commonly used or mechanical reading format. If you prefer, we can send them to the new manager you designate. It is only valid in certain cases.
    - To file a claim with the Spanish Data Protection Agency or competent control authority, if you believe that we have not treated you correctly.
    - To revoke the consent for any treatment for which you have consented, at any time.

If you modify any information, we thank you for telling us to keep them updated.

When you exercise your rights of suppression, opposition, limitation or withdraw your consent, BETICA TRAVEL S.A. will stop processing your data, except for compelling legitimate reasons or the exercise or defense of possible claims.

All these rights may be exercised by contacting us at the following addresses:

Address: C / OBISPO JUAN ALONSO, 7. TORREMOLINOS, 29620 DE MALAGA, or

Email: [BETICATRAVEL4@GRUPOAIRMET.COM](mailto:BETICATRAVEL4@GRUPOAIRMET.COM).

We have forms for the exercise of your rights, ask for them by email or if you prefer, you can use the ones elaborated by the Spanish Data Protection Agency or third parties.

Always remember that you exercise any of the rights that we have exposed you, that these forms must be signed electronically or be accompanied by a photocopy of your ID, so that you can verify your identity.

If someone represents you, you must attach a copy of your ID, or sign it with your electronic signature.

The forms can be presented in person, sent by letter or by mail at the address of the person referenced above.

Also, if you are not satisfied with how we have treated your rights, you can file a claim with the Spanish Agency for Data Protection, through the website [www.aepd.es](http://www.aepd.es).

HOW LONG DO WE HAVE TO ANSWER THE RIGHTS EXERCISE?

It depends on the right, but at most one month from your request, and two months if the subject is very complex and we notify you that we need more time.

DO WE TREAT COOKIES?

The website may use cookies (small information files that the server sends to the computer of the person accessing the page) to carry out certain functions that are considered essential for the proper functioning and visualization of the website. The cookies used on the website have, in any case, a temporary nature and do not involve a processing of personal data, with the sole purpose of making more efficient its subsequent transmission, and could be maintained in order to know the user's preferences and send you information about the contents of your interest.

This website can use three types of cookies:

- Session cookies: Those used to store user data that accesses a web page (operating system, browser type, language), to facilitate navigation.
- Cookies techniques: Those that allow to use security elements during navigation, control traffic and data communication, identify the session and access restricted access parts, among other functions.

-Cookies Analytics: Those that allow you to know the number of pages visited, sessions visited, browsing time, ip address and domains from which they are accessed. (This site does not use third-party services for these functions)

The information stored is used to know the frequency of visits and preferences in reference to the contents of the pages visited, etc. If you do not wish to allow the installation of cookies on your computer, you must configure your browser for this purpose. To configure your browser to accept or reject, by default, all cookies, or to receive a warning on the screen of the receipt of each cookie and decide, at that time, whether or not to install it on your hard drive. To do this, we suggest the help section of your browser, to know how to change the configuration you currently use.

IP addresses: the servers of the website will be able to detect automatically the IP address and the domain name used by the user. An IP address is a number automatically assigned to a computer when it connects to the Internet. All this information is registered in an activity file that allows the subsequent processing of the data in order to obtain only statistical measurements that allow knowing the number of page impressions, the number of visits made to web services, the order of visits , the access point, etc.

All cookies used by BETICA TRAVEL S.A. they are owned and in no case are third-party cookies used.

HOW LONG ARE WE GOING TO KEEP YOUR PERSONAL DATA?

Personal data will be maintained while you are still connected with us.

Once you dissociate, the personal data processed in each purpose will be maintained during the legally stipulated deadlines, including the period in which a judge or court may require them, taking into account the limitation period for legal actions.

The data processed will be maintained as long as the aforementioned legal deadlines do not expire, if there is a legal maintenance obligation, or if the legal term does not exist, until the interested party requests their suppression or revocation of the consent granted. We will keep all the information and communications related to the clients or the provision of our service, while the guarantees or responsibilities of our products or services last, to attend to possible claims.

USERS

Access and / or use of this portal owned by BETICA TRAVEL S.A. attributes the condition of USER, who accepts, from said access and / or use, the General Conditions reflected here. The aforementioned conditions will apply regardless of the General Conditions of Contract that in their case are mandatory.

USE OF THE PORTAL

www.beticatravel.com provides access to a multitude of information, services, programs or data (hereinafter, "the contents") on the Internet belonging to BETICA TRAVEL S.A. or to its licensors to which the USER may have access. The USER assumes responsibility for the use of the portal. This responsibility extends to the registration that is necessary to access certain services or contents. In this registry, the USER will be responsible for providing truthful and lawful information. As a result of this registration, the USER can be provided with a password for which he will be responsible, committing himself to make diligent and confidential use of it. The USER undertakes to make appropriate use of the contents and services that BETICA TRAVEL S.A. it can offer through its portal and with an enunciative but not limitative character, not to use them to (i) engage in illicit, illegal or contrary to good faith and public order activities; (ii) disseminate content or propaganda of a racist, xenophobic, pornographic-illegal nature, advocating terrorism or attacking human rights; (iii) causing damage to the physical and logical systems of BETICA TRAVEL S.A., its suppliers or third parties, introducing or spreading computer viruses or any other physical or logical systems that are capable of causing the aforementioned damage; (iv) try to access and, where appropriate, use the email accounts of other users and modify or manipulate their messages. BETICA TRAVEL S.A. reserves the right to withdraw all comments and contributions that violate respect for the dignity of the person, that are discriminatory, xenophobic, racist, pornographic, that attempt against youth or childhood, order or public safety or that, in their judgment, they will not be suitable for publication. In any case, BETICA TRAVEL S.A. will not be responsible for the opinions expressed by users through forums, chats, or other participation tools.

#### INTELLECTUAL AND INDUSTRIAL PROPERTY

BETICA TRAVEL S.A. by itself or as an assignee, is the owner of all the intellectual and industrial property rights of its website, as well as the elements contained in it (for example, images, sound, audio, video, software or texts, trademarks or logos, color combinations, structure and design, selection of used materials, computer programs necessary for its operation, access and use, etc.), owned by BETICA TRAVEL SA or from its licensors. All rights reserved. By virtue of the provisions of articles 8 and 32.1, second paragraph, of the Law on Intellectual Property, the reproduction, distribution and public communication, including the method of making them available, of all or part of the articles is expressly prohibited. contents of this website, for commercial purposes, in any medium and by any technical means, without the authorization of BETICA TRAVEL SA The USER undertakes to respect the rights of Intellectual and Industrial Property owned by BETICA TRAVEL SA. of the portal and even print them, copy them and store them on your computer's hard drive or on any other physical medium, as long as it is solely and exclusively for your personal and private use. The USER must refrain from deleting, altering, evading or manipulating any protection device or security system that was installed on the pages of BETICA TRAVEL S.A ..

#### IP ADDRESSES

The website's servers can automatically detect the IP address and domain name used by the user. An IP address is a number automatically assigned to a computer when it connects to the Internet. All this information is registered in a server activity file duly registered that allows the subsequent processing of the data in order to obtain only statistical measurements that allow knowing the number of page impressions, the number of visits made to web services, the order of visits, the access point, etc.

#### EXCLUSION OF GUARANTEES AND RESPONSIBILITY

BETICA TRAVEL S.A. is not responsible, in any case, for damages of any kind that may cause, by way of example: errors or omissions in the content, lack of availability of the portal or the transmission of viruses or malicious or harmful programs in the contents , despite having adopted all the technological measures necessary to avoid it.

#### MODIFICATIONS

BETICA TRAVEL S.A. reserves the right to carry out without prior notice the modifications it deems appropriate in its portal, being able to change, delete or add both the contents and services provided through it and the way in which they are presented or located in their portal.

#### LINKS

In the case that in [www.beticatravel.com](http://www.beticatravel.com) there were links or hyperlinks to other Internet sites, BETICA TRAVEL S.A. will not exercise any type of control over said sites and contents. In no case BETICA TRAVEL S.A. shall assume no responsibility for the contents of any link belonging to a third party website, nor shall it guarantee the technical availability, quality, reliability, accuracy, amplitude, veracity, validity and constitutionality of any material or information contained in any of said hyperlinks or other websites of Internet. Likewise, the inclusion of these external connections will not imply any type of association, merger or participation with the connected entities.

#### RIGHT OF EXCLUSION

BETICA TRAVEL S.A. reserves the right to deny or withdraw access to the portal and / or the services offered without prior notice, on its own or by a third party, to those users who fail to comply with these General Conditions of Use.

#### GENERALITIES

BETICA TRAVEL S.A. pursue the breach of these conditions and any misuse of its portal exercising all civil and criminal actions that may correspond by law.

#### MODIFICATION OF THE PRESENT CONDITIONS AND DURATION

BETICA TRAVEL S.A. You can modify at any time the conditions determined here, being duly published as they appear here. The validity of the aforementioned conditions will be based on their exposure and will be in force until they are modified by others duly published.

## SECURITY

The website uses information security techniques generally accepted in the industry, such as firewalls, access control procedures and cryptographic mechanisms, all with the aim of preventing unauthorized access to data. To achieve these ends, the user / client accepts that the provider obtains data for the purposes of the corresponding authentication of the access controls.

Any hiring process or that involves the introduction of personal data will always be transmitted through a secure communication protocol (Https: //, ...), in such a way that no third party has access to the information transmitted electronically.

## APPLICABLE LEGISLATION AND JURISDICTION

The relationship between BETICA TRAVEL S.A. and the USER will be governed by current Spanish regulations and any controversy will be submitted to the corresponding Courts and Tribunals.

Date of the last modification / update of this legal notice: 11/23/2018

For any question, you can contact BETICA TRAVEL S.A. in the email [viajesbeticatravel@gmail.com](mailto:viajesbeticatravel@gmail.com)