

BRISTOL SUNSET BEACH PRIVACY POLICY

LAST UPDATED ON THE 4TH OF JUNE 2018

First of all, we would like to thank you for your trust. We take your privacy very seriously, and because of this we are providing you with this document so that you can clearly see what data we collect and process about you, as well as the measures that we take to maintain its security.

If you have used our services before, you are aware that Bristol Sunset Beach offers online services related to travel by means of our websites, apps, as well as through other online platforms or marketplaces, such as those of our partners and social media platforms. It's important you keep this in mind, given that all of the information available in the present document is applicable to all of these entities. In other words, all of the data that we collect on you and our use of this data is regulated by this Privacy Policy.

It is possible that we may modify this Privacy Policy at a later date. Because of this and keeping in mind that we are truly concerned about your privacy, we recommend that you read this document often so that you know exactly what is happening with your data. In addition, if we make any changes to this Policy, we will notify you of these changes prior to their effective implementation.

Because of this, in accordance with the provisions of the [Organic Law on the Protection of Personal Data](#) and Regulation (EU) 2016/679 of the European Parliament and of the Council, we hereby inform you that by filling out the forms on the website <https://www.bristolsunsetbeach.com>, hereinafter "the website", "Bristol Sunset Beach" or "bristolsunsetbeach.com", you are giving us your express consent as well as all of the personal data that you provide to us via the website [bristolsunsetbeach.com](https://www.bristolsunsetbeach.com), and agree to this data being included in and processed in the file created for this purpose managed by the website owner.

1. Who processes your data?

Identity of the owner: ITAR World Investment S.L. – VAT identification number B76175470

Postal address: Av. Juan Carlos I N°3, 35660, Corralejo, La Oliva, Las Palmas

Email: booking@bristolsunsetbeach.com

2. What data do we collect on you?

The personal data that you provide: We receive and store all of the data that you voluntarily provide on our website or all data that you send to us in any other way. This information, which you provide to us and which can identify you, is what we call "personal data", and includes your first and last name, telephone number, postal address, email address and fax number, and if you make a booking on our website, your credit card information (such as the credit card number, name of the cardholder and expiry date). We will also be permitted to request data on your apartment preferences, the activities that you like and information on loyalty, frequent traveller and/or car rental programs. You can choose to not provide this information, but be aware that in general, certain data on yourself is required in order to purchase products or services, fill out your traveller profile, participate in a survey, competition or promotion, ask us questions or carry out other transactions on the website.

Information on accompanying travellers: When you make a booking for another person on [bristolsunsetbeach.com](https://www.bristolsunsetbeach.com), we are required to request the personal data and travel preferences for this person. Because of this, you will be required to have obtained the prior consent of this person before handing over this personal data and travel preferences, as any access to view or change the data provided will only be available via your account (if one exists).

From other sources: Either periodically or sporadically, we will also be permitted to obtain personal and non-personal data on you originating from associated entities, business partners and any other type of independent third-party source and to add it to our data on your account (if one exists). As an example of the type of data that we could receive, this data includes updated data on delivery and your address, purchase history and demographic information.

Automatically: As soon as you visit our website, we collect certain data automatically, even if you do not make a booking. This information includes your IP address, the date and time that you are accessing our website's services, the hardware, software or Internet browser that you are using and data on your computer's operating system, which can include the application version and language configuration. We also collect data on the clicks that you make and the pages that we have displayed to you.

If you are using a mobile device, we will collect information that identifies your device, its configurations and specific features and other activities on the system. When you make a booking on our system, it records data on the means, web pages or websites with which you have made the booking or via which you have accessed the web pages of the website bristolsunsetbeach.com and/or the apps of Bristol Sunset Beach (if they exist).

3. How do we use your data?

We use the credit card data that you provide (such as the cardholder name, card number and expiry date) in order to manage our relationship with you: to **complete the travel bookings** that you make on our website, including for invoice processing and notifications on your trip; to personalise your experience with Bristol Sunset Beach in other ways; to ask for information about you, including through surveys; to resolve disputes, collect fees or locate failures; to prevent potentially prohibited or illegal activities; to ensure compliance with our Terms of Use and in any other way described to you at the time of the data collection. In these cases, the time that the data is conserved will be that necessary for processing (for contracts and invoices, five and ten years, respectively).

We also use this data to **communicate with you in general, to answer your questions and comments, to give you better customer service** or when necessary, to measure your interest in our products, services and websites in order to improve them. Data will be kept for the duration of time it is processed for the management of inquiries.

We use other information on you for the following purposes: to **be able to offer you products and services that you request from us, to send you confirmations and updates on your trip and to operate your account** (if one exists).

Last of all, we use this data to send you notifications by email or post on special offers and products and services related to your trip and which could be of interest to you. The time that this data is conserved will be the time of processing.

Email communications: We would like it to be easy for you to make the best of the opportunities related to travel on our website. To do so, we send email messages containing information on your interests related to travel. For example, if you search for or make a booking on our website for a certain date, we could send you an email with special offers for activities that could interest you on those dates. We believe that these email messages will provide you with useful information on activities and special offers related to the products and services available on our website. We remind you that you will always have the opportunity to choose to not receive these types of messages in any of the messages that we send to you.

We recommend that you read the section entitled "[Your options regarding the collection and use of your data](#)" below in order to exercise your rights relating to email communication.

4. With whom do we share your data?

Bristol Sunset Beach is permitted to share your data with the following entities:

Service providers: nonetheless, the provision of certain services may require the transfer of data to other entities in order to carry out or provide a service. Service providers are the people or companies that provide services or carry out functions on behalf of Bristol Sunset Beach, including activities such as processing credit cards, business analysis, customer service or CRM, marketing, the distribution of surveys or lottery programs and fraud prevention. In certain cases, we could also authorise certain service providers to collect data on our behalf, including, depending on the case, the data necessary to operate certain components on our website or to facilitate the delivery of advertising in line with your interests. Our service providers shall only be permitted to collect and access the data necessary to properly carry out their duties and tasks; on the other hand, they will never be permitted to share or use your data for any other purpose. In all of these cases, ITAR World Investment S.L. will require the company hired and/or individual professional as well as the people responsible for processing the personal data handed over to sign a confidentiality agreement applicable to this personal data in order to ensure the privacy of this data.

Companies in our corporate group: Data will be sent to our corporate subsidiaries in the leisure, travel and real estate sector, including Grupo Destiny Home S.L.U., Rental & Property Services Canary Islands S.L. and Tym Real Estate Canary Islands S.L., for internal administrative purposes, including the processing of the personal data of customers or employees.

We will also be permitted to share your data in the following exceptional cases:

- In the case that we are required by law, believing in good faith that the information revealed is necessary to comply with applicable laws or legal proceedings.
- When we judge that it is appropriate to investigate, obstruct or take measures related to illegal activities or when suspicion that activities are illegal exists or to protect and defend the rights, assets or security of Bristol Sunset Beach, Itar World Investment S.L, the website bristolsunsetbeach.com or its users, so long as this is in accordance with our [Terms of Use](#) or other agreements.

It is also important for you to be aware that we will be permitted to share any type of additional or anonymous data with third parties, including advertisers and investors. For example, we will be permitted to inform our advertisers of the number of visitors that our website receives, the services most often purchased and the most popular apartments or properties. Keep in mind that this data does not contain any personal information and will be used to develop content and services that are adapted to your preferences and those of the remainder of the website's users as well as to evaluate the effectiveness of our advertising.

In all of these cases, we guarantee that data is stored in European Union countries (and therefore guarantee compliance with the European Union General Data Protection Regulation) or in accordance with the EU-US Privacy Shield agreement approved by the European Data Protection Board (you can find more information here: <https://www.privacyshield.gov/list>).

5. How do we use mobile devices?

Bristol Sunset Beach offers free apps for a large variety of mobile devices, as well as all of the versions of our standard website, which have been optimised for mobile and tablet browsers. On all mobile apps and websites, we process the personal data that you provide to us practically in the same way as we do via our website; these mobile apps and websites also enable the use of geolocation services to find travel and leisure services close to you whenever you enable this. With your consent, we will send you push notifications with information on your bookings. When you upload a photograph from your mobile device, it will be tagged with your location information. To change this option, you should closely read the instructions manual for your mobile device to find out how to change this configuration and how to allow or cancel the sharing of the aforementioned data or the receipt of push notifications.

To optimise our services, offer you a better experience and carry out marketing activities, we use a technology known as cross-device tracking. This technology works with or without the use of cookies. To obtain more information on cookies and similar technologies, you can consult our [Cookies Policy](#). By using cross-device tracking, bristolsunsetbeach.com can track users' behaviour over different devices. Cross-device tracking also encompasses combining the data collected from one browser or mobile device in particular with another computer or device related to the computer or device from which the data has been collected.

To optimise the content that we offer in our bristolsunsetbeach.com newsletters, we combine the searches and bookings made on different devices and computers. Remember that you can unsubscribe to our newsletter whenever you want by clicking on the unsubscribe link.

You should also be aware that the ads that you view on other web pages, websites or apps are also displayed based on the activities that you carry out on linked computers and devices. If you change the cookie configuration on your device (for more information, see the "What are my options?" section of our [Cookies Policy](#)), if you wish to, you can change the cross-device tracking configuration for advertising purposes. It is also necessary to clarify that signing out of your user account (if one exists) does not mean that you will cease to receive ads or personalised advertising.

6. How do we use social media?

Bristol Sunset Beach uses social media for different purposes, such as making it easier to use our online booking services; however, you should keep in mind that we also use it to promote the travel, leisure and real estate products and services of companies in our corporate group as well as to advertise, improve and offer our own services, as in the following cases:

- **To sign on with one of your social media accounts.** If you wish, we give you the opportunity to create a bristolsunsetbeach.com account by using the information from one of your social media accounts so that you do not have to remember multiple usernames and passwords. Remember that you can unlink the associated account at any time.
- **To integrate social media plug-ins.** We have incorporated social media plug-ins on our

bristolsunsetbeach.com websites and apps. This means that whenever you click on one of the buttons (such as the Facebook “Like” button), certain information will be shared with the social media platform provider to which the plug-in belongs. Remember that if you have signed on by using your social media account, the social media platform provider may link this information to your account, making it possible that your actions will show up on your profile on that social media platform so that you can share them with other people.

- **Other social media tools and services.** If we believe it to be necessary, we will also integrate other social media services, such as the messaging services provided by social media platforms, in such a way as to allow you to interact with Bristol Sunset Beach or with your contacts regarding our services. Remember that whenever you sign on to Bristol Sunset Beach via a social media platform, the service provider in question will allow you to share information with Bristol Sunset Beach. For example, if you sign on to bristolsunsetbeach.com using a social media account, this could share certain information (this depends on how you have authorised the social media provider that you are using at the time of the login) with Bristol Sunset Beach.com. Keep in mind that this information can include your email address, age or profile pictures.

7. Why do we transfer information to countries outside of the European Union?

It is important for you to know that the personal data that you have entrusted to us by means of Bristol Sunset Beach and our website bristolsunsetbeach.com can at times be transferred to and processed in any other country outside of the European Economic Area where we possess facilities or where companies in our corporate group or our service providers possess facilities, including countries (such as the United States) for the purposes described in this Privacy Policy. This is because we use virtual infrastructure based on a “cloud computing” model to offer you a better experience.

Remember that whenever we store or transfer your personal data outside of the European Economic Area, we will do so in accordance with applicable law and in accordance with the EU-US Privacy Shield agreement approved by the European Data Protection Board. If you would like, you can find out more information at <https://www.privacyshield.gov/list>.

It is also important for you to be aware that when using our services, you accept that your personal data may be transferred to our facilities as well as the facilities of the third parties with which we share this data, as described in the present Privacy Policy.

8. How can you access, rectify, cancel and oppose your data?

If there is anything that we understand and value at Bristol Sunset Beach, it is our wish for you to be in control of how we use the personal data that you have provided us with. Because of this, we offer you the following possibilities:

- **ACCESS:** You can ask us for a copy of the personal data that we store on you in a structured, commonly-used and legible format.
- **RECTIFICATION:** At any time, you can inform us of any change in your personal data or ask us to make the corrections that you believe to be appropriate regarding the data that we store on you.
- **CANCELLATION:** We hope that this will not happen, but when this is the case, you can ask us to delete, block or restrict the processing of the personal data that we possess regarding you.
- **OPPOSITION:** if you believe it to be necessary, you can oppose any specific form of our use of your personal data.
- **LIMITATION:** In the event that you have granted your consent for a specific purpose, you have the right to withdraw your consent at any time without this affecting the lawfulness of processing based on consent prior to its withdrawal.
- **PORTABILITY:** If you so require, you can also ask us to send you the personal data that you have provided to us to a third party.

You should also be aware that when we use your personal data based on your consent, you have the right to withdraw said consent at any time subject to regulations in effect. In addition, it is important for you to know that when we process your personal data based on legitimate interests or the public interest, you have the right to oppose our use of the aforementioned personal data at any time in accordance with applicable legislation.

We trust that you will guarantee that your personal data is correct, complete and up-to-date. If changes to this data occur at any time, please notify us of them as soon as possible.

If you have a user account (if one exists) on bristolsunsetbeach.com, you can access a significant portion of your personal data via our website. Our website offers the option of adding, updating or eliminating the personal data that we store on you.

In the event that any of the personal data that we possess on you is not available on our website, you can request it at no cost to yourself. In addition, if you consider it necessary to make any requests regarding this Privacy Policy and to exercise any of your rights or to make a complaint, you can write us at booking@bristolsunsetbeach.com. In addition, if necessary, we remind you that you can contact your local data protection authorities.

If you would like to oppose the processing of your personal data for any legitimate reason and there does not exist a direct exclusion mechanism available to you, please contact us at booking@bristolsunsetbeach.com.

9. Why does your personal data have to be accurate and truthful?

Sending and/or providing your personal data is required to contact us and receive information on the products and services offered by Bristol Sunset beach and on our website bristolsunsetbeach.com. Therefore, if you decide to not send the personal data requested or to not accept the present Data Protection Policy, this can make it impossible for you to use the services provided by our website or our apps, such as signing up, booking a stay, checking in online or receiving information on our products and services.

You should also remember that you are the only person responsible for the truthfulness of and for correcting (check [section 8](#) "How can you access, rectify, cancel and oppose your data?") the personal data that you provide to us, and you hereby release the owner from any liability with respect to these matters.

You guarantee and answer for the accuracy, up-to-date nature and authenticity of the personal data provided and you commit to duly keep this data up-to-date. By accepting the present Privacy Policy, you are accepting to provide us with complete and correct data both in forms to register, subscribe or pay for services and/or the products that you are contracting or purchasing.

The owner shall not be liable for the truthfulness of the information that it has not created itself as well as the information that is indicated in other sources; therefore, we do not assume any liability for hypothetical damages that could be derived from the use of the aforementioned information. Consequently, you release Bristol Sunset Beach (ITAR World Investment S.L.) from all liability for any damages that you may incur as a result of errors, flaws or omissions in the data provided by Bristol Sunset Beach so long as this data originates from sources other than Bristol Sunset Beach.

The same applies to your personal data as well as to data that you provide to us on third parties, which you must always do with their express consent and after having informed the third parties in question of the facts contained in this clause. Bristol Sunset Beach (ITAR World Investment S.L.) does not assume liability for the handover of the personal data of third parties that have not granted their consent or are not aware of the contents of the present clause, with this liability falling on you or the person handing over the aforementioned data to Bristol Sunset Beach (ITAR World Investment S.L.).

Please inform us of any variation in the data that you have provided to us.

10. How do we protect your personal data?

As its holder, we are committed to protecting all of the confidential data to which we have access. When collecting and processing personal data, we have adopted the security measures that we consider to be the most suitable to back up and prevent the loss or unauthorised access or handling of all of your data in accordance with the provisions of Royal Decree 1720/2007 of the 21st of December.

We believe that it is important for you to be aware that we have applied the appropriate administrative, physical security and technical measures to help us protect the personal data that you send to us. Keep in mind that only authorised staff members have access to this data. In addition, for your peace of mind, we would like to inform you that we use encryption when sending your personal and confidential data, such as your credit card data, between your system and ours. Moreover, as extra measures, we use firewalls and intrusion detection systems in order to prevent unauthorised access to your personal data.