

## PRIVACY POLICY

BASIC INFORMATION ON DATA PROTECTION			
<b>DATA CONTROLLER</b>	<b>SELENTA HOSPITALITY MANCO S.L.U.</b>		
	<b>CATEGORIES OF INTERESTED PARTIES</b>	<b>PURPOSES</b>	<b>LEGAL BASIS</b>
<b>PURPOSES</b>	- Users	- To enable their navigation	- Consent
	- Clients	- Sending commercial communications	- Consent
		- Elaboración de perfil comercial.	- Consent
	- Requests for information	- To answer requests for information, resolve doubts, queries or process claims	- Performance of pre-contractual measures
		- Manage whistleblowing channel	- Public Interest
	<b>Co-responsible: Selenta Group Companies</b>		
- Candidates	- Manage their participation in selection processes and future vacancies.	- Consent	
<b>RECIPIENTS</b>	<ul style="list-style-type: none"> <li>- Administrations and Public Bodies</li> <li>- Selenta Group companies for internal administrative purposes. If you have consented, your data may also be communicated to other Selenta Group companies for the sending of commercial information and, where appropriate, to create a commercial profile to personalise the communications sent.</li> <li>- Third parties that have access to your personal information associated with your browsing on the Website, as informed in the Cookies Policy.</li> </ul>		
<b>RIGHTS</b>	<ul style="list-style-type: none"> <li>• Revocation of consent, access, rectification, portability, opposition, restriction of treatment and erasure of data.</li> </ul>		
<b>ADDITIONAL INFORMATION</b>	<ul style="list-style-type: none"> <li>• If you consider that any of your rights have been violated, you can file a complaint with the AEPD.</li> </ul>		

The purpose of this Privacy Policy is to comply with the duty of transparency in the processing of personal data, allowing users of the website [www.selentagroup.com](http://www.selentagroup.com) (hereinafter the "Website") to know how their personal data is collected, stored, used, processed and protected when they access the Website or interact with the SELENTA GROUP entities listed in this Privacy Policy.

SELENTA GROUP is aware of the importance of processing the personal data of users who access our resources or services, so this Privacy Policy has been drafted in a simple, clear and practical way.

## 1. RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA

We inform you that, as a general rule, the entity acting as Data Controller is **SELENTA HOSPITALITY MANCO S.L.U** (hereinafter, "**SELENTA GROUP**"), whose identification and contact details are as follows:

- Registered Office: Avenida Diagonal 605, 5ª planta, local 2B, 3-4, 08028, Barcelona
- VAT NUMBER: B10569234
- Phone number: (+34) 936 003 030
- E-mail: [info@selentagroup.com](mailto:info@selentagroup.com)

Additionally, the personal data provided may be processed by other entities that are part of the SELENTA GROUP, depending on the specific services requested, in accordance with the provisions of this Privacy Policy.

The SELENTA GROUP is made up of the following entities:

- Mare Nostrum Resort, S.L.
- Restaurantes de Arona, S.L.
- Hotel Don Carlos Marbella OpCo, S.L.
- Luna del Mar Entertainment, S.L.
- Explotación Hotelera Expo, S.L.
- Selenta Benalmádena, S.L.
- Selenta Princesa Operating S.L.

Notifications to any of the SELENTA GROUP entities related to the processing of your personal data may be sent to the following address: Av. Diagonal 605, pl. 5, local 2B-3-4, - 08028 Barcelona (Spain).

## 2. NEED TO PROVIDE THE DATA.

We inform you that your personal data will not be processed, and you will not be obliged to provide any personal information simply by accessing the Website, except as provided for in the [Cookies Policy](#).

However, the use of some services or functionalities of the Website or the request and/or contracting of services offered by the SELENTA GROUP does require you to provide certain personal data, indicated in the corresponding forms, and implies their processing by the SELENTA GROUP or the corresponding entity or entities as indicated in each case, for the purposes and by virtue of the applicable legitimisation bases identified below. The refusal to provide this data implies the impossibility of processing the applications or contracts made.

### **3. RESPONSIBLE PARTIES, PURPOSES AND BASES OF LEGITIMACY.**

#### **3.1. TREATMENT ACTIVITIES CARRIED OUT BY SELENTA GROUP**

The personal data provided to SELENTA GROUP will be processed for the purposes and on the basis of the legitimacy indicated below:

##### **USERS**

- To enable browsing on the Website, thus allowing you to access the information and content established by the Website. Although it is true that the mere visit to the Website does not require you to provide personal information, certain functionalities do depend on the use of cookies, as reported in the Cookies Policy, the basis of legitimacy being the consent expressly given when accepting the Website's cookies, where appropriate.

##### **INFORMATION SEEKERS**

- Manage your request for information, if you provide your personal data using the contact form or email address made available to you on the Website, in order to answer your requests for information, resolve your doubts, queries or process your claims. The legal basis for legitimising the processing of your data is the application of pre-contractual measures necessary to process your request. In this way, the processing is necessary to allow the appropriate processing of your requests for information, resolve your doubts, answer your queries or process your communicated claims and verify the operation of the service in accordance with the established procedures, as well as to obtain evidence of the content of the requests received and the reason for the processing of the personal data that you may provide.

##### **CUSTOMERS OF SELENTA GROUP ENTITIES**

- Where you have given your consent, we will process your data for the following purposes:
  - Sending of promotions and commercial communications related to the products and services provided by the SELENTA GROUP entities.
  - To create a commercial profile to personalise the commercial communications sent.

#### **3.2.-PROCESSING ACTIVITIES CARRIED OUT BY SELENTA GROUP ENTITIES ON A CO-RESPONSIBILITY BASIS.**

## CANDIDATES.

The SELENTA GROUP entities will process your data on a co-responsibility basis in order to assess your application for selection processes and future vacancies in the SELENTA GROUP. The legal basis for processing your data for this purpose is your consent, freely expressed by sending the registration form on the job portal.

### 3.3.- TREATMENTS CARRIED OUT BY SELENTA GROUP COMPANIES:

#### CUSTOMERS

The companies that are part of the SELENTA GROUP process personal data when you interact with them, request information or access their websites, as informed in their Privacy Policies.

Additionally, each of the entities that make up the SELENTA GROUP will process your data as Data Controllers for the following purposes:

- Customer service: when you contact customer service or make a reservation or request information by telephone, you will be attended by our "telephone service". In this case, your data will be processed by the entity belonging to the SELENTA GROUP to which you direct your request, the legal basis of legitimacy being the management and development of the contractual relationship or the application of pre-contractual measures to your request.
- Video surveillance: when you access a premises, establishment or accommodation managed by the SELENTA GROUP entities, you will be informed by means of easily identifiable signs about the capture of your image for video surveillance purposes. The legal basis of legitimacy is the development of a public interest mission in accordance with article 6.1 e) of the RGPD.

#### COMPLAINTS

- In case you make a complaint through the complaints channel made available to you, your data will be processed in order to analyse the complaint and, if necessary, take the necessary actions against the person reported. The basis of legitimacy that enables the processing of data is the fulfilment of a mission carried out in the public interest, such as the prevention and discovery of possible conduct that contravenes both the internal regulations of SELENTA GROUP, as well as Directive 2019/193 and Organic Law 3/2018 on the Protection of Personal Data and guarantee of digital rights. You have the right to object at any time to the processing of your personal data in the public interest, in accordance with the provisions of the "Exercise of rights" section of this Privacy Policy.

### 4. TYPE OF DATA PROCESSED.

#### 4.1.- GRUPO SELENTA will process the following categories of data:

##### USERS

- Data provided to enable browsing on the Website and the use of cookies for the purposes indicated in the [Cookies Policy](#), where necessary: IP, user ID, language, browser preferences, browsing habits.

##### INFORMATION SEEKERS

- Data provided through the contact form:
  - Identification and contact details: name and surname, country, email, telephone.

- Other information provided voluntarily concerning: company, job position or other information provided in the comments section.

## **CUSTOMERS**

- Data collected for the sending of commercial communications related to products and services of the SELENTA GROUP companies:
  - Identification and contact details: name and surname, email, telephone, postal address.
- Data collected for the elaboration of a commercial profile for the sending of personalised information:
  - Identification data: Names and surnames, ID.
  - Data on personal characteristics: age, gender, country.
  - Goods and services transaction data: contracted services, preferences, inferred data.

### **4.2.- The entities of the SELENTA GROUP will process the following categories of data as co-responsible for the processing:**

## **CANDIDATES**

- Data collected through the job portal or by sending your CV:
  - Identification data: Name, surname, first name.
  - Contact details: Telephone, e-mail, address.
  - Data on personal characteristics: age, nationality.
  - Academic data: CV, education, professional experience.
  - Professional data: employment history, assessment of the candidate, subjective annotations.

### **4.3.- Other treatments carried out by SELENTA GROUP companies as Independent Responsible Parties:**

## **CUSTOMERS**

- Data collected for **video surveillance purposes**:
  - Image.
- Data collected through the telephone helpline service:
  - Identification and contact details: Name and surname.
  - Contact details: Telephone, e-mail.
  - Data related to your enquiry or services provided.

## **COMPLAINTS**

- Data provided through the complaints channel:
  - Identification and contact details: name and surname, email, telephone.
  - Other information provided voluntarily concerning details of the defendant or witnesses and information relating to the event.

In case the user provides data of third parties, he/she declares to have their consent and commits to transfer the information contained in the Privacy Policy, exempting SELENTA GROUP from any

responsibility in this regard. Nevertheless, the SELENTA GROUP may carry out periodic verifications to confirm this fact, adopting the corresponding due diligence measures, in accordance with data protection regulations.

## **5. THIRD PARTY RECIPIENTS OF THE DATA.**

Your personal data may be communicated to the competent Public Administrations and Bodies that may require them at any time, in accordance with the legislation in force.

In addition, your data may be communicated to SELENTA GROUP entities for internal administrative purposes. If you have consented, your data may also be communicated to other SELENTA GROUP companies ([www.selentagroup.com/business/](http://www.selentagroup.com/business/)) to send commercial information and, where appropriate, to develop a commercial profile to personalise the communications sent.

Finally, some third parties may have access to your personal information associated with your browsing on the Website in relation to third party cookies as indicated in the [Cookie Policy](#).

## **6. DATA RETENTION**

The Data Controller will process your data for as long as they are necessary for the purpose for which the processing is carried out as indicated below and, once it has been completed, they may be kept for the legally required periods for possible liabilities arising from the processing.

### **USERS**

The data processed for the purpose of enabling your browsing on the Website and allowing the uses associated with the installation of cookies will be kept for the periods indicated in each case in the [Cookie Policy](#).

### **INFORMATION SEEKERS**

The data processed in order to manage and respond to your requests and/or requests for information received through the different contact channels indicated on the Website will be processed for the time necessary to correctly deal with your requests and/or specific requests according to each case.

### **CUSTOMERS OF SELENTA GROUP ENTITIES**

The data processed for the purpose of sending communications will be processed until such time as you object to the processing for these purposes or, where appropriate, withdraw your consent.

With respect to data processed for the purpose of commercial profiling, until you request the limitation of the processing carried out for profiling or, where appropriate, revoke your consent.

### **CANDIDATES**

The data processed to manage your application and inform you of new vacancies will be kept until you indicate otherwise or GRUPO SELENTA considers them obsolete, so it is your responsibility to keep them updated, as they will be used to communicate future vacancies that fit your profile and may be of interest to you.

### **COMPLAINTS**

On the other hand, the data provided through the complaints channel will be processed for the time necessary to analyse the complaint and will be kept for the time necessary to decide on the appropriateness of initiating an investigation into the facts reported and for a maximum of three months from the time they are provided, unless their conservation is necessary as evidence.

### **CUSTOMER SERVICE**

The data processed in order to manage and respond to your requests and/or requests for information received through the telephone service, processed for the time necessary to correctly deal with your requests and/or specific requests according to each case.

## **VIDEO SURVEILLANCE**

The data will be kept for a maximum period of one month, unless it is necessary to keep them for a longer period because it is convenient for the establishment of responsibilities derived from the facts that are the object of the recording, in which case they may be kept until the end of this process.

## **7. EXERCISE OF RIGHTS**

As the owner of the personal data, you have the right to contact, at any time and free of charge, any of the entities of the SELENTA GROUP, by writing to SELENTA GROUP or contacting our Data Protection Delegate through [dpo@selentagroup.com](mailto:dpo@selentagroup.com), to exercise your rights regarding data protection and, specifically, the following:

- Access your personal data and obtain confirmation as to whether the SELENTA GROUP or the entities of the SELENTA GROUP process your personal data.
- Rectify inaccurate or incomplete data.
- Revoke consents granted.
- Oppose certain processing and, specifically, those based on the legitimate interest of the SELENTA GROUP or the entities of the SELENTA GROUP.
- Request the deletion of your data when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
- Obtain from the SELENTA GROUP or the entities of the SELENTA GROUP the limitation of data processing when any of the conditions foreseen in the data protection regulations are fulfilled.
- Request the portability of the data provided by the user in those cases provided for in the regulations.
- Contact the DPO of GRUPO SELENTA at the following address: [dpo@selentagroup.com](mailto:dpo@selentagroup.com)
- File a complaint regarding the protection of personal data before the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)) at the address Calle de Jorge Juan, 6, 28001 Madrid, when the interested party considers that GRUPO SELENTA has violated the rights that are recognised by the applicable data protection regulations.

In case of doubt about your identity, supporting documentation may be required for the processing of your application.

## **8. SECURITY MEASURES**

GRUPO SELENTA will treat the user's data at all times in an absolutely confidential manner and will keep the mandatory duty of secrecy with respect to them, in accordance with the provisions of the applicable regulations, adopting the necessary technical and organisational measures to guarantee the security of your data and avoid its alteration, loss, unauthorised processing or access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed.

## **9. PRIVACY POLICY UPDATE**

SELENTA GROUP reserves the right to modify this Privacy Policy in order to adapt it to its needs or to any new legislative developments that may arise. In such cases, it will announce the changes introduced and publish them on this Website, so that you can access them at any time and easily.

**Last update: February 2023**

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