

Privacy Statement

Effective Date: April 2018

This Privacy Statement applies to <http://royal-golf-park.club> owned by the members of Royal Golf park Club and operated by Sunpark Management SL. This Privacy Statement describes how we collect and use the information, which may include personal data, you provide on our web site: <http://royal-golf-park.club>. It also describes the choices available to you regarding our use of your personal data and how you can access and update this data.

Data Collection

The types of personal data that we collect include:

- Your first name, last name, email address, phone number and home address;
- Credit card details (type of card, credit card number, name on card, expiration date and security code);
- Guest stay data, including date of arrival and departure, special requests made, observations about your service preferences (including room preferences, facilities or any other services used);
- Data you provide regarding your marketing preferences or in the course of participating in surveys, contests or promotional offers;

You may always choose what personal data (if any) you wish to provide to us. If you choose not to provide certain details, however, some of your transactions with us may be impacted.

Data we collect automatically

When using our website, we also collect information automatically, some of which may be personal data. This includes data such as language settings, IP address, location, device settings, device OS, log information, time of usage, URL requested, status report, user agent (information about the browser version), operating system, result (viewer or booker), browsing history, user Booking ID, and type of data viewed. We may also collect data automatically through cookies. For information on how we use cookies, click [here](#) (*link to new Cookie Notice*).

Processing Purposes

We use your personal data for the following purposes:

- A. Reservations: We use your personal data to complete and administer your online reservation.
- B. Customer service: We use your personal data to provide customer service.
- C. Guest reviews: We may use your contact data to invite you by email to write a guest review after your stay. This can help other travellers to choose the accommodation that suits them best. If you submit a guest review, your review may be published on our website.
- D. Marketing activities: We also use your data for marketing activities, as permitted by law. Where we use your personal data for direct marketing purposes, such as commercial newsletters and marketing communications on new products and services or other offers which we think may be of interest to you, we include an unsubscribe link that you can use if you do not want us to send messages in the future.
- E. Other communications: There may be other times when we get in touch by email, by post, by phone or by texting you, depending on the contact data you share with us. There could be a number of reasons for this:

- a. We may need to respond to and handle requests you have made.
 - b. If you have not finalised a reservation online, we may email you a reminder to continue with your reservation. We believe that this additional service is useful to you because it allows you to carry on with a reservation without having to search for the accommodation again or fill in all the reservation details from scratch.
 - c. When you use our services, we may send you a questionnaire or invite you to provide a review about your experience with our website. We believe that this additional service is useful to you and to us as we will be able to improve our website based on your feedback.
- F. Analytics, improvements and research: We use personal data to conduct research and analysis. We may involve a third party to do this on our behalf. We may share or disclose the results of such research, including to third-parties, in anonymous, aggregated form. We use your personal data for analytical purposes, to improve our services, to enhance the user experience, and to improve the functionality and quality of our online travel services.
- G. Security, fraud detection and prevention: We use the information, which may include personal data, in order to prevent fraud and other illegal or infringing activities. We also use this information to investigate and detect fraud. We can use personal data for risk assessment and security purposes, including the authentication of users. For these purposes, personal data may be shared with third parties, such as law enforcement authorities as permitted by applicable law and external advisors.
- H. Legal and compliance: In certain cases, we need to use the information provided, which may include personal data, to handle and resolve legal disputes or complaints, for regulatory investigations and compliance, or to enforce agreement(s) or to comply with lawful requests from law enforcement insofar as it is required by law.
- If we use automated means to process personal data which produces legal effects or significantly affects you, we will implement suitable measures to safeguard your rights and freedoms, including the right to obtain human intervention.

Legal Bases

- In view of purposes A and B we rely on the performance of a contract: The use of your data may be necessary to perform the contract that you have with us. For example, if you use our services to make an online reservation, we will use your data to carry out our obligation to complete and administer that reservation under the contract that we have with you.
- In view of purposes C-H, we rely on its legitimate interests: We use your data for our legitimate interests, such as providing you with the best appropriate content for the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes. When using personal data to serve our legitimate interests, we will always balance

your rights and interests in the protection of your information against our rights and interests.

- In respect of purpose H, we also rely, where applicable, on our obligation to comply with applicable law.
- Where needed under applicable law, we will obtain your consent prior to processing your personal data for direct marketing purposes.

If needed in accordance with applicable law, we will ask your consent. You can withdraw your consent anytime by contacting us at any of the addresses at the end of this Privacy Statement.

If you wish to object to the processing set out under C-F and no opt-out mechanism is available to you directly (for instance in your account settings), to the extent applicable, please contact admin@royal-golf-park.club.

Data Sharing

- We have teamed up with Freetobook located at 100 Berkeley Street, 2nd Floor, Glasgow, G3 7HU (<https://en.freetobook.com>) (hereafter Freetobook) to offer you our online reservation services. While we provide the content to this website and you make a reservation directly with us, the reservations are processed through Freetobook. The information you enter into this website will therefore also be shared with Freetobook and its affiliates. This information may include personal data such as your name, your contact details, your payment details, the names of guests travelling with you and any preferences you specified when making a booking.

To find out more about the Freetobook corporate family, visit https://en.freetobook.com/about_us/.

- Third-party service providers: We use service providers to process your personal data strictly on our behalf. This processing would be for purposes as included in this Privacy Statement such as facilitating reservation payments, sending out marketing material or for analytical support services. These service providers are bound by confidentiality clauses and are not allowed to use your personal data for their own purposes or any other purpose.
- Competent authorities: We disclose personal data to law enforcement and other governmental authorities insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud.

International Data Transfers

The transmission of personal data as described in this Privacy Statement may include overseas transfers of personal data to countries whose data protection laws are not as comprehensive as those of the countries within the European Union. Where required by European law, we shall only transfer personal data to recipients offering an adequate level of data protection. In these situations, we make contractual arrangements to ensure that your personal data is still protected in line with European standards. You can ask us to see a copy of these clauses using the contact details below.

Security

Freetobook observes reasonable procedures to prevent unauthorised access to, and the misuse of, information including personal data. We use appropriate business systems and procedures to protect and safeguard information including

personal data. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorised personnel are permitted to access personal data in the course of their work.

Data Retention

We will retain your information, which may include personal data for as long as we deem it necessary to provide services to you, comply with applicable laws, resolve disputes with any parties and otherwise as necessary to allow us to conduct our business including to detect and prevent fraud or other illegal activities. All personal data we retain will be subject to this Privacy Statement. If you have a question about a specific retention period for certain types of personal data we process about you, please contact us via the contact details included below.

Your choices and rights

We want you to be in control of how your personal data is used by us. You can do this in the following ways:

- You can ask us for a copy of the personal data we hold about you;
- you can inform us of any changes to your personal data, or you can ask us to correct any of the personal data we hold about you;
- in certain situations, you can ask us to erase or block or restrict the processing of the personal data we hold about you, or object to particular ways in which we are using your personal data; and
- in certain situations, you can also ask us to send the personal data you have given us to a third party.

Where we are using your personal data on the basis of your consent, you are entitled to withdraw that consent at any time subject to applicable law.

Moreover, where we process your personal data based on legitimate interest or the public interest, you have the right to object at any time to that use of your personal data subject to applicable law.

We rely on you to ensure that your personal data is complete, accurate and current. Please do inform us promptly of any changes to or inaccuracies of to your personal data by contacting admin@royal-golf-park.club. We will handle your request in accordance with the applicable law.

Questions or Complaints

If you have questions or concerns about our processing of your personal data, or if you wish to exercise any of the rights you have under this notice, you are welcome to contact us via admin@royal-golf-park.club. You may also contact your local data protection authority with questions and complaints.

Changes to the Notice

Just as our business changes constantly, this Privacy Statement may also change for time to time. If you want to see changes made to this Privacy Statement from time to time, we invite you to access this Privacy Statement to see the changes. If we make material changes or changes that will have an impact on you (e.g. when we start processing your personal data for other purposes than set out above), we will contact you prior to commencing that processing.