

# Privacy Policy

## Data controllers

Three companies are co-responsible for processing:

NA XAMENA HOTEL HACIENDA SA, (hotel)

Na Xamena s/n, San Miguel

07815, Ibiza, Balearic Islands

Spain

POSIDONIA RESORT SL, (spa)

Avenida Ignacio Wallis 12 1º

07800, Ibiza, Balearic Islands

Spain

RESPO SL, (food and beverages)

Avenida Ignacio Wallis 12 1º

07800, Ibiza, Balearic Islands

Spain

## Privacy Principles

At RESPO SL we are committed to working with you continuously to guarantee the privacy of the treatment of your personal data, and to offer you at all times the most complete and clear information that we can. We encourage you to read this section carefully before providing us with your personal data.

If you are under fourteen years of age, please do not give us your details without your parents' consent.

In this section we inform you how we treat the data of people who have a relationship with our organization. Starting with our principles:

- We do not ask for personal information, unless it is necessary to provide you with the services you require.
- We never share personal information with third parties, except to comply with the law, or with your express permission.
- We will never use your personal information for purposes other than those stated in this privacy policy.
- Your data will always be treated with an adequate level of protection in accordance with data protection legislation, and we will not subject them to automated decisions.
- In order to provide you with an impeccable service, your personal data are managed jointly by the three companies.

This privacy policy has been drafted considering the requirements of current data protection legislation:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals (RGPD).
- Ley Orgánica 15/1999, de 13 de diciembre, de Protección de Datos de Carácter Personal (LOPD).
- Royal Decree 1720/2007, of 21 December (RLOPD).

This privacy policy was enacted on 25 May 2018. Due to the modification of treatment criteria, in order to facilitate its understanding or adapt it to current legislation, it is possible that we modify this privacy policy. We will update the date of the same one, so that you can verify its validity. Treatments we carry out

### CONTACT PROCESSING

Purpose: To meet your requests, requests or queries received from the web, via email or telephone. Respond to your request and follow up later.

Legitimation: Consent of the interested party.

Addressees: No data will be given to third parties.

Retention period: We will keep your data for the time necessary to comply with the purpose for which they have been collected and to determine the possible liabilities that may arise from that purpose and the processing of the data.

#### TREATMENT OF CLIENTS

Purpose: To manage reservations at our facilities (hotel, spa and restaurant), to manage relationships with our customers, billing and collection. Sending offers of similar or complementary products/services to those you have bought from us.

Legitimation: Contractual relationship, legitimate interest and legal obligation.

Addressees: Your data will be communicated to the competent Public Administrations in the cases provided for in the legislation in force, and for the purposes established by said legislation. We will only communicate them to third parties if they are essential for the provision of the service.

Retention period: We will keep your data for an indefinite period once the period required by law has expired, or until you request their cancellation.

#### MARKETING TREATMENT

Purpose: To provide you with information about products and services that we believe may be of interest to you. In each commercial communication you will have the opportunity to oppose this treatment by unsubscribing.

Legitimation: Consent of the interested party.

Addressees: No data will be given to third parties.

Retention period: We will keep your data for an indefinite period. We will cancel them if you request it, or if after a certain number of emails, you do not take any action.

#### HR TREATMENT

Purpose: To evaluate the curriculum vitae that you provide us to consider you in the personnel selection processes that we can carry out.

Legitimation: Consent of the interested party.

Addressees: No data will be given to third parties.

Retention period: We will keep your data for a period of no more than 5 years.

#### VIDEO-SURVEILLANCE PROCESSING

Purpose: Video surveillance of installations and labour control.

Legitimation: Legitimate interest of the data controller.

Addressees: The images may be communicated to the Security Forces and Corps, the Judicial Bodies and the Public Prosecutor's Office.

Retention period: We will keep your data for a period not exceeding 1 month.

#### YOUR RIGHTS

You have the right to ask us for a copy of your personal data, to rectify inaccurate data or to complete it if it is incomplete, or to delete it if it is no longer necessary for the purposes for which it was collected.

You also have the right to limit the processing of your personal data and to obtain your personal data in a structured and legible format.

You may object to the processing of your personal data in certain circumstances (in particular, when we do not have to process them to comply with a contractual or other legal requirement, or when the purpose of the processing is direct marketing).

Once you have given us your consent to process your data for a certain purpose, you may withdraw it at any time. At that time, we will stop processing your data or, if applicable, we will stop doing so for that particular purpose. If you decide to withdraw your consent, this will not affect any processing that took place while your consent was in force.

These rights may be limited, for example, if in order to comply with your request we have to disclose information about someone else, or if you ask us to delete certain records that we are required to maintain by a legal obligation or by a legitimate interest, such as the exercise of

defending claims. Or even where the right to freedom of expression and information should prevail.

You can contact us by any of the means indicated in the Responsible for Treatment section of this privacy policy, providing a copy of a document that accredits your identity (normally your Identity Card), addressing any of the co-responsible for the treatment.

Another of your rights is not to be the object of a decision based solely on automated processing, including the preparation of profiles that produce legal effects or affect you.

In the event of any infringement of your rights, such as, for example, failure to comply with your request, you have the right to lodge a complaint with the Supervisory Authority regarding data protection. This can be your country's (if you live outside Spain) or the Spanish Data Protection Agency (if you live in Spain).

## Additional information

Processing of your data in the European Economic Area.

We use the servers of [www.viewson.net](http://www.viewson.net), Steinbachstrasse 1, 95679, Waldershof, Germany | +49 923 1972573 to host our website and its content.

Processing of your data outside the European Economic Area.

For the indicated treatments we can use the service of the following providers outside the European Economic Area, but under the agreement of Privacy Shield, approved by the data protection authorities of the European Union.

GOOGLE: Cloud services and email. More information:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>

MICROSOFT: Cloud services, communication via Skype and email. More information:

<https://www.privacyshield.gov/participant?id=a2zt00000000KzNaAAAK>

DROPBOX: Cloud storage, synchronization and file sharing. More information:

<https://www.privacyshield.gov/participant?id=a2zt00000000GnCLAAQ>

WHATSAPP: Instant messaging and file sending service. More information:

<https://www.privacyshield.gov/participant?id=a2zt00000000TShwAAG>

THE FORK: booking reservation system and CRM. More information:

<https://www.thefork.com/legal>

## Links to third party websites

Our website may, from time to time, contain links to other websites. It is your responsibility to ensure that you read the data protection policy and legal conditions that apply to each site.

## Third party data

If you provide us with data from third parties, you assume the responsibility of informing them beforehand in accordance with article 14 of the RGPD.

## Cookies

A cookie is a small data file that we save on your computer. A cookie is not a program and does not contain a virus. A cookie does not serve to collect personal data without your knowledge, but records information related to your browsing on the website, which may be consulted by the Eden Restaurante & Lounge.

Except for those required for the operation of the website, by default, the cookies are not automatically stored. In accordance with applicable regulations, the Eden Restaurant & Lounge requires your authorization before installing any other type of cookies.

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", to help the website analyse how users use the site. Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing them other services relating to website activity and internet usage.

The IP-address that your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser:

<http://tools.google.com/dlpage/gaoptout?hl=en>.

## Company and legal information

The Eden Restaurante & Lounge (legal name: Respo SL) has European tax base in Ibiza, Spain; with international VAT number: ES-B-07264310; and legal address: Avenida Ignacio Wallis 12 1º, 07800, Ibiza, Islas Baleares, España. Contact: +34 971 33 45 00 – [info@edenrestaurante-ibiza.com](mailto:info@edenrestaurante-ibiza.com)

## Last update and effective on

13th of February 2019