

Privacy Policy

Last updated: 21 May 2018

1.- Identification and Description

1.1.- Identification

The data collected through the use of this service are included in a record of processing activities, the data controller of which is Hotelinking S.L., with a registered address of Gremi Cirurgians i Barbers 48, 2F, 07009, Palma de Mallorca, España.

Tax identification number: B57943185

Email: dataprotection@hotelinking.com

1.2.- Description

Accepting the Hotelinking S.L. privacy policy (hereinafter, "Privacy Policy") is an essential condition to connecting to the following private Wi-Fi service (hereinafter, the "Service").

This Privacy Policy regulates the collection, processing and use of your personal and non-personal information as a user of the Service as of the effective date indicated in the heading.

Hotelinking S.L. assigns the personal information collected when you use the Service to the hotel where you're staying or visiting for another reason. The details of this assignment are provided in this Privacy Policy and particularly in section 7.

You hereby declare that all the information you provide to access the Service before and during us is truthful, complete and accurate.

2.- Information Collected

You must register to use the Service either via a form or your Facebook profile. The information (personal and non-personal) collected by the Service may vary based on this.

The information (personal and non-personal) collected by the Service will reach us in three different ways:

- 1) information collected automatically
- 2) information you voluntarily provide us with and
- 3) information provided by third parties.

2.1.- Information Collected Automatically

This information will consist of:

- That which is collected through cookies or similar mechanisms stored on your device, always with your consent. See our [Cookies Policy](#) for more information.
- The IP address from which you make the connection, the type of device used and its characteristics, your MAC, the operating system version, the type of browser, the language, the date, the place where you connect, the time of your request or the mobile network used, among others.
- Data from the use of the Service and possible errors detected during use.

2.2.- Information You Voluntarily Provide

This information will consist of:

- That which is required by Hotelinking S.L. to complete registration so you can

use the private Wi-Fi network if you complete the form and are staying at the hotel: room number, full name, gender, email address and date of birth.

All these data are mandatory.

If you are under 14 years old, you must expressly indicate that you have authorisation from a legal representative, such as your parents, in order to register and use the Service. Otherwise, you cannot complete the registration process.

- That which is required by Hotelinking S.L. to complete registration so you can use the private Wi-Fi network if you complete the form and are not staying at the hotel: full name, gender, email address and date of birth.
- Any personal or non-personal information that may be included in messages sent through the contact channels established for the Service; for example, your name, nickname or email address.

2.3.- Information Provided by Third Parties

This information will consist of:

- That which is provided by Facebook if you use your profile to complete registration for the Service.
- That which is provided by Wi-Fi communication network hardware suppliers.

3.- Age

As far as the use of the Service, you hereby declare that you are at least 14 years old and have the necessary legal capacity to bind yourself to this agreement and use the site pursuant to the terms and conditions thereof, which you fully understand and acknowledge.

If you are under 14 years old, you must expressly indicate that you have authorisation from a legal representative, such as your parents, in order to register and use the Service. Otherwise, you cannot complete the registration process.

4.- Rights and Purposes

The personal data you provide us are included in a file and will be processed by Hotelinking S.L., in order to respond to your queries, provide the service requested, monitor the quality thereof, guarantee security and provide communications.

You may exercise your rights of access, rectification, erasure, restriction of processing, opposition and portability of your personal data at any time by writing to: dataprotection@hotelinking.com or the mailing address: Gremi Cirurgians i Barbers 48, 2F, 07009, Palma de Mallorca, España.

In both cases, you must identify yourself with your full name and a copy of your national identity document.

[Here](#) you can find different model forms for use if you wish to exercise your rights.

If you have granted consent for a specific purpose, you have the right to withdraw consent at any time without such action affecting the lawfulness of processing based on the consent granted prior to the withdrawal thereof.

Furthermore, if you believe there is a problem with the way the Service is handling your data, you may file a complaint with the corresponding [data supervisory authority](#) which would be the [Spanish Data Protection Agency](#) in Spain.

5.- Use of the Data and Legal Grounds

Hotelinking S.L. will use the data collected to:

- Manage, provide and update the Service (the legal grounds for such collection is the data controller's legitimate interest in preventing unauthorised access, detecting incidents and preventing cyberattacks).
- Process your user registration (the legal grounds for which is your consent).
- Answer any of your queries (the legal grounds for which is the data controller's legitimate interest in communicating with the user with respect to their Service).
- Email you suggestions for participation in future commercial activities under the Service, whenever you authorise such (the legal grounds for which is the data controller's legitimate interest in commercial prospecting).
- Plan and carry out activities under the Service, such as mailings with commercial information from third-party collaborators such as hotels (the legal grounds for which is your specific consent or accommodation contract, as applicable).
- Help maintain Service security, investigate unlawful activities, enforce our terms and conditions and help national police forces with any investigations (the legal grounds for which is the data controller's legitimate interest in preventing unauthorised access, detecting incidents and preventing cyberattacks).

Moreover, Hotelinking S.L. may use the users' information in the form of aggregate and anonymous data for third-party reporting. It may also share statistics and demographic information on users and their use of the Service with third parties. Nothing of this sort will enable such third parties to identify you personally.

5.1.- In emails and contact forms

The Service website is SSL encrypted to securely send your personal data through standard contact forms.

The personal data collected will be automatically processed and included in the corresponding records of activities, the owner of which is the Service.

To this end: we will receive your IP address, which will be used to verify the source of the message in order to offer adequate recommendations (for example, offering information in the correct language) and detect possible irregularities (attempted cyberattacks on the Service, for example), as well as data relating to your ISP.

5.2.- In social networks

The Service has profiles in some of the main Internet social networks and is the data controller in relation to data published in them (photos uploaded by the Service with people's faces, for example).

The processing the Service will undertake with the data in each of said networks will, at most, be as allowed by the social network for corporate profiles. Thus, the Service may inform our followers through any means permitted by the social network of its activities and special offers as well as provide personalised customer service whenever not prohibited by the law.

Under no circumstance will the Service extract data from social networks unless it has specific and express consent from the user to do so.

When, due to the very nature of social networks, the effective exercise of the follower's data protection rights is subject to the modification of said party's personal profile, the Service will help you and advise you of such to the extent possible.

6.- Data conservation

The period of time the data processed by the Service is saved is indicated below:

- Disaggregate data will be saved without any deadline for erasure.
- Data on registered users will be saved for the minimum period necessary and may be saved for up to 5 years pursuant to art. 1964 of the Spanish Civil Code (personal actions without a special deadline).
- Data on subscribers of agreed commercial communications, whether accommodated users or not, will be saved from the time the user subscribes until the user unsubscribes.
- Data on users uploaded by the Service to social network pages and profiles will be saved from the time the user grants consent until consent is withdrawn.

7.- Data assigned and shared with third parties

Hotelinking S.L. will assign the data collected in the Service records. This assignment will be to the hotel where the user is staying or located at upon using the private Wi-Fi service.

The hotel may only use the assigned data to:

- Send commercial communications to the accommodated user (pursuant to the legal grounds of the contract with the hotel).
- Send commercial communications to the user when not accommodated if he/she consents at the time of registration (in which case the legal grounds would be consent).

- Guarantee the security and stability of the private Wi-Fi service offered (the legal grounds for such collection is the data controller's legitimate interest in preventing unauthorised access, detecting incidents and preventing cyberattacks).

Moreover, some third parties, as data processors, manage some of the Service and, therefore, access data collected by Hotelinking S.L.

Hotelinking S.L. requires they comply with this Privacy Policy as applicable in addition to having their own and comply with all contractual provisions.

Hotelinking S.L. may share, use or save some of the personal information collected with third parties:

- To provide the Service: Service providers who provide accommodation, commercial analytics, customer service or marketing on our behalf. These service providers may collect and have access to the information necessary to perform their duties, but are not allowed to share or use the information for any other purpose.
- Service providers who provide accommodation, commercial analytics, customer service or marketing on our behalf. These service providers may collect and have access to the information necessary to perform their duties, but are not allowed to share or use the information for any other purpose.
 - a) If we believe it is reasonably necessary to comply with any law, legal process or legitimate interest. In any case, we will only provide the information strictly required.
 - b) If we believe this action is appropriate for complying with the Hotelinking S.L. terms and conditions.
 - c) If needed to detect or prevent fraud or issues related to the security of Hotelinking S.L., its providers and users.

8.- Security measures

Hotelinking S.L. adopts all the necessary technical and organisational measures to protect the security and integrity of the personal and non-personal information collected. This includes protection against unauthorised access as well as their accidental alteration, loss or destruction.

In any case, Hotelinking S.L. cannot guarantee the absolute security of the information collected meaning you should cooperate and use common sense at all times with regard to the information shared.

You hereby understand and acknowledge that even after personal and non-personal information is deleted, it may be visible through a web cache or when other users have copied or saved it.

9.- Changes to the Privacy Policy

We may update this Privacy Policy in the future.

We will inform you of the changes by sending a notice to the email address provided and/or by posting a notice in a prominent location on our website or the service itself.

10.- Contact

If you have any questions about Privacy Policy, you may contact us at:

Email : dataprotection@hotelinking.com

Address: Gremi Cirurgians i Barbers 48, 2F, 07009, Palma de Mallorca, España