

PRIVACY

Basic Information on Data Protection	
Joint controllers	Universo Pacha, S.A. Universo Pacha, S.A.
Purpose	To provide the service of accessing, using and enjoying the Website; to manage the provision of Pacha services; and, subject to your consent, to send you personalized commercial communications based on your interests profile.
Legal grounds	Performance of the contract Compliance with legal obligations Legitimate interest Consent
Recipients	Pacha Group entities listed in the additional information. To the data processors listed in the additional information.
Rights	Access, rectify and delete data, as well as other rights, as explained in additional information.
Additional information	Additional and detailed information on Data Protection can be found in our Privacy Notice

Privacy Policy

I. – Who processes your personal data?

The joint data controllers of the personal data collected and processed through online forms or when making a reservation on our website www.grupopacha.com (hereinafter, the “**Website**”) are:

- Universo Pacha, S.A.
- Universo Pacha, S.A.

The aforementioned entities act as joint data controllers with respect to your personal data (jointly hereinafter “**Controllers**”, “**Us**”, “**We**” or “**Pacha**”).

II. – What kind of personal data do we process?

Subject to the specific services provided by Pacha that you decide to use, to your choices and, where applicable, your device settings (regarding, in particular, to cookies and other trackers), the personal data about you collected and processed by Pacha may include: your first name and last name, email address, phone number, postal address and telephone number, photographs of you (subject to your prior explicit consent), your bank account or credit card details, details of your previous bookings and your table, accommodation or service preferences, as well as subject to your consent your lifestyle interests, your hobbies, your profession/sector or your birthday.

While browsing through our Website or hiring our services, we may request you to identify yourself by creating an user account or request you further information about. In such case, any personal data that is necessary for the provision of the particular service will be marked as such. Without such data, we may not be able to render our services properly.

Please note that when you book a reservation through the services of a third-party, we may obtain the data detailed above directly from them (e.g. booking websites, travel agencies, concierges, etc.). Their processing of your personal data would be explained in detail in their corresponding privacy notices.

III. – For what purposes do we process your personal data?

Your personal data will be collected and processed by Pacha under the legal bases mentioned below to fulfill the following purposes:

- Based on the **performance of the relevant contracts** executed between you and Pacha; in particular:
 - o to ensure your access, use and enjoyment of the functions of the Website.

The downloading of, installation of, browsing through and otherwise use of our Website is subject to the applicable terms and conditions.

- o to respond to and manage requests for booking our services, including the management of the payment.

Please note that the reservation, booking and enjoyment of our services is subject to the applicable terms and conditions.

- o to manage the provision of the service you contracted, as well as any additional service booked by you or on your behalf, including the management of the payment.

Please note that the reservation, booking and enjoyment of our services is subject to the applicable terms and conditions.

- Based on our **compliance with applicable legal obligations**, including, among others:

- o in case you stay in one of our hotels or other accommodation services, to log information about your identity and your stay in our facilities into our record of travelers, as required by applicable regulations.
- o to comply with regulations preventing money laundering and the financing of illegal activities.
- o to comply with applicable tax regulations.

- Based on our **legitimate interests** (more information on the weighing of interests is available upon request), in particular:

- o to answer questions you may send via online forms or to meet any other requests from your side, following our legitimate interest in providing a high-quality customer care.
- o to ensure the security of your online transactions, to prevent fraud and payment defaults, following our legitimate interest in fighting and preventing fraud and payment defaults.
- o to share your personal data with other entities within the [Pacha Group](#) to attend your request and provide your services, following our legitimate interest in carrying out a uniform and comprehensive administration of the business activity of the Pacha Group.

- Based on your **prior and explicit consent**, in particular:

- o to create a profile based on your booking and purchase history and on the preferences you may have disclosed to Pacha when enjoying our services in the past, in order to adjust our services to your preferences and/or to offer more personalized advertising.
- o to send you commercial communications based on your profile via email, phone, SMS, push notifications and traditional mail; with information about offers, news and events from Pacha and the relevant entities of the [Pacha Group](#)

- o to disclose your personal data to social media partners like Facebook, Google or Amazon to create a profile based on your preferences, including the combination of external sources, in order to personalize the user's experience and/or to offer you more personalized advertising.

The use and/or combination of our Social Media Partners external databases and tools intended to carry out segmented and customized marketing activities allows us to have a more detailed knowledge about your preferences in order to offer you individualized, customized and accurate advertising according to your specific interests and your habits.

These social media partners generally operate as independent data controllers, and are responsible for their own compliance with the applicable data protection laws. You should refer to their respective privacy notices for more information on how they process personal data.

V. – Do we share your personal data?

Generally, your personal data shall not be transferred or made accessible to any third party. However, in order to fulfill the purposes described above, Pacha may need to disclose on a need-to-know basis your personal data to third parties of the Pacha Group listed [here](#)

Pacha may also need to disclose your personal data to third parties that support us in the provision of services we offer you, such as financial service providers, technology and security service providers, marketing and advertising related service providers. They will process your personal data as data processors under specific contractual terms and subject to the applicable data protection regulations.

VI. – Do we transfer your personal data abroad?

The recipients of your personal data may be located abroad, including outside the European Economic Area. Any transfer of your personal data outside the European Economic Area will only take place under the execution of the Contractual Clauses of the European Commission, in accordance with applicable data protection laws and regulations.

For more information on how your personal data will be disclosed to recipients abroad, please contact us by writing lopdp@pacha.com. You also have the right to contact us for more information about the safeguards implemented by Pacha to guarantee adequate protection of your personal data when it is transferred as described above.

VII. – What are your rights when you provide us with your data?

Pursuant to the provisions of the applicable data protection laws and regulations, you may exercise your rights of access, rectification, erasure, objection, restriction of

processing and data portability, as well as your right to withdraw your consent to the processing of your personal data.

We, as Joint Controllers, have agreed that you may exercise your rights by simply contacting us through lopd@pacha.com or by sending a letter by regular post to C/ Canarias 37, Ed. Cetus, Torre 4, Pta. 4º, CP: 07800, Ibiza, Balearic Islands, Spain. Please note that in case we have not enough information to identify you and proceed with your request, we may have to ask you for further information.

You have also the right to file a complaint with the Spanish Data Protection Agency or any other relevant data protection authority in case you deem it necessary.

VII. – For how long will we process your personal data?

We will store your data as long as necessary to provide you with the services requested. When Pacha does not need to use your personal data anymore to comply with contractual or statutory obligations, it will be blocked or archived in our systems only for the period necessary for the establishment, exercise and defense of legal claims until the expiry of applicable statutes of limitations.

If we need to keep your personal data for tax, audit, or legal compliance for a legally prescribed time period thereafter, or if we need it to preserve evidence within statutes of limitation, we will retain the data for such purposes.

Once this period has elapsed, the data will be either erased or anonymized.

VIII. – Considerations regarding personal data provided by third parties

If in the course of your interaction with us you disclose data of third parties to us (for example to arrange a reservation for a friend or other third party), you confirm that you have informed them of the purpose and the way in which we will process their personal data. You also acknowledge and represent that the personal data you provide Pacha with is accurate and updated to the moment of their provision, and commit to notify Pacha of any change to these personal data.

X. –Changes to this Privacy Notice

This Privacy Notice may be updated by us from time to time. In such event, we will post the updated version of the text on the Website. However, you will be notified of any material changes to this Privacy Notice. We encourage you to periodically review this Privacy Notice to stay informed about our privacy practices.