PRIVACY POLICY

1. DATA PROTECTION AND PRIVACY

For the purposes of the Data Protection Act 2018 and the EU General Data Protection Regulation 2016/679 it is confirmed that the proprietor of the website located at https://www.signaturetoursmarbella.com (the "Website") is Avenida Ceuta S/N Edif. Capricho, Blq.2, 4ºD, Marbella, 29602, Spain. ("MV Signature Tours Marbella").

MV Signature Tours Marbella is committed to protecting the privacy of users of our Website ("you," "your") and sets out its Privacy Policy below in compliance with the Data Protection Act 2018 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, the personal information you provide to us when using this website in accordance with this privacy policy.

2. COLLECTION OF PERSONAL DATA

The Website allows you to access and use a range of information relating to travel destinations, including information relating to businesses offering goods and services relating to travel.

MV Signature Tours Marbella may collect certain personal data from you via the Website if you choose to submit it. Personal data about you may also be collected by MV Signature Tours Marbella if you contact MV Signature Tours Marbella with queries or to request further information about the Website or any other matter.

The types of personal data which MV Signature Tours Marbella may collect from you in the ways referred to above when using the Website may include full name, gender, address, telephone numbers, e-mail address, demographic information and contact preferences.

MV Signature Tours Marbella does not store credit card details.

3. HOW WE USE YOUR INFORMATION

With your consent

MV Signature Tours Marbella may collect your personal data for the purpose of contacting you about queries you may have or information or materials which you may provide to MV Signature Tours Marbella via the Website. Specifically, MV Signature Tours Marbella may use your personal data to set up records for the provision of MV Signature Tours Marbella information to you. MV Signature Tours Marbella may also use your personal data to better understand who uses our Website and the pages they access so as to be able to improve the Website and the types of information and data provided to users in general via the Website from time to time.

In addition, from time to time, MV Signature Tours Marbella may also use your personal data to contact you for market research or user care survey purposes or to let you know about other services MV Signature Tours Marbella may be able to provide to you, or to provide you with newsletters, details of special offers or similar. MV Signature Tours Marbella will always give you the opportunity to opt-out of such communications.

MV Signature Tours Marbella will ensure that your personal data will not be disclosed to other organisations, institutions and authorities unless specifically required by law.

Furthermore, MV Signature Tours Marbella will not collect information about you from other sources, such as public records or bodies, or private organisations.

If MV Signature Tours Marbella transfers management, ownership or hosting of the Website to a third party, you agree that MV Signature Tours Marbella may also transfer your personal data and any other information about you to such third party without your further or additional permission, provided that such third party agrees to the same terms of this Privacy Policy.

You hereby agree to and authorise MV Signature Tours Marbella to use the personal data you provide to MV Signature Tours Marbella for the above purposes. If MV Signature Tours Marbella would like to use your personal data for a purpose other than those above, MV Signature Tours Marbella will request your permission first.

In our legitimate interest* to improve our services

- Market research to contact you (and others if their personal information is provided by you) to ask about the experience using our services as part of a continual program of customer service improvement. This is not marketing communication and is separate to Marketing communications above.
- Website customisation to customise our website and its content to your particular preferences in accordance with the Cookies and Tracking section below
- Customer support monitor calls and help train staff in relation to our customer support and helpdesk function;
- Product and service improvement to improve our product and services;
- Service analysis to conduct research, statistical analysis and behavioral analysis. This may include providing aggregate statistical information relating to customers, sales, traffic patterns and related site information to reputable third parties.

In our legitimate interest* to protect against fraud

Website improvement and fraud prevention – improve our websites, prevent or detect fraud or abuses of our websites and enable third parties to carry out technical, logistical or other functions on our behalf

^{*} any reliance on legitimate interest shall not prejudice your interest or fundamental rights and freedoms.

4. PRINCIPLES OF DATA PROTECTION

The registry is handled carefully, and data processed by the information systems is adequately protected. Record information is kept on Internet servers, and the physical and digital security of their hardware is handled appropriately. The controller ensures that the stored data, server access rights and other critical data related to the security of personal data are processed confidentially and only by the employees whose job description it belongs

We also use a third-party email service, mailchimp.com, to manage our regular email communications to members and Mailchimp act as a data-processor on behalf of MV Signature Tours Marbella.

By submitting your personal data, you agree to this.

5. KEEPING YOUR DATA SECURE

Sending information over the internet is generally not completely secure, and we can't guarantee the security of your data while it's in transit, however, to give users greater confidence the MV Signature Tours Marbella website is protected via a HTTPS connection, verified by SSL certificate, which provides encryption for data entered on the site. However, no data transmitted over the internet can be guaranteed to be 100% safe and MV Signature Tours Marbella do not accept liability for any data in transit and any data you send is at your own risk.

To protect your information, MV Signature Tours Marbella has policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner and all systems that can access the information have proportionate and reasonable security measures in place. While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to warranty the absolute security of your data when using our services. In order to process any of the requests listed below, we may need to verify your identity for your security. In such cases your response will be necessary for you to exercise this right.

We will always take appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing (including taking reasonable steps to ensure the reliability of employees who have access to personal information).

We protect user information by employing secure servers, firewalls, SSL encryption (where appropriate) and other technology. Our employees may only process personal information in accordance with this privacy policy, and any employee who breaches this privacy policy may be subject to disciplinary action, up to and including dismissal.

We have put in place internal procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

6. DATA RETENTION

We retain your information for a range of purposes and will not be kept longer than necessary for the purpose. Data will be retained for 6 years however you may ask for this to be deleted in accordance with the Rights of the GDPR (see Right to be forgotten) by contacting us via info@signaturetoursmarbella.com

7. YOUR RIGHTS

Access to your data

At any point you can contact us to request details concerning the information we hold about you, why we have that information, who has access to the information and where we got the information. In most cases you may be entitled to copies of the information we hold concerning you. Once we have received your request we will respond within 30 days. Please submit a request via info@signaturetoursmarbella.com

Update your data

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated. Please submit a request via info@signaturetoursmarbella.com

Right to be forgotten

If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or tell you the reason why it cannot be deleted. Please submit a request via info@signaturetoursmarbella.com

Object to processing & request restriction

You have the right to request that MV Signature Tours Marbella stops processing your data. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights. You have the right to request that we stop contacting you with direct marketing. On promotional emails we provide an 'unsubscribe' link at the top and bottom of the email which will unsubscribe you from that service. You can also unsubscribe by updating your subscriptions on your account on our website or via our unsubscribe link. If you wish to opt out with respect to more than one email address, you must complete a separate request for each email address. You have the right to request that we stop profiling you in relation to our direct marketing practice. You can inform us and we will deal with your request

accordingly. You can make a complaint to us by contacting us to the data protection supervisory authority in Spain.

Data Portability

You have the right to request that we transfer your data to you in a machine readable format. Once we have received your request, we will need to verify your identity and comply where it is feasible to do so.

8. COOKIES

The MV Signature Tours Marbella website uses cookies and tags. A cookie is a small text file that can be stored by your browser on the device you use to access internet and allows the browser to pass small amounts of information about user behavior on the given website to a web server. Tags are pieces of code that exist on web pages and collect information about usage of the web pages.

At MV Signature Tours Marbella we use our own cookies and tags to enable the smooth operation of the websites, such as the use of the basket function or to automatically log you in when you visit (with your permission). We also use cookies/tags to monitor visits to our website and continuously look for places to improve your website experience.

Cookie Consent

The first time you access a MV Signature Tours Marbella website, you will be informed about our use of cookies to improve your site experience. By continuing to browse our website you consent to our use of cookies.

Description of Cookies

- Google Analytics These cookies give us critical information about various pages on the websites and how our users interact with them. We use this information to improve the performance of our website and the information presented to users
- Facebook Píxel.

How to reject and delete Cookies

Should you wish to reject or block the use of cookies, you can do so at any time, usually by clicking 'Help' on your browser. Cookies are specific to individual browsers so if you use more than one browser, you will need to delete cookies on each browser. Please be aware though that by rejecting cookies you may not receive the optimum website experience.

9. CHANGES TO POLICY

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version that will apply each time you

access the website.

It is also important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your

relationship with us.

10. CONTACT

If you have any queries about this policy, need further information or wish to lodge a

complaint you can use the details below to contact us.

Montserrat Vidal Carbonell

Email: <u>info@signaturetoursmarbella.com</u>

Telephone: +34 695 734 822