

PRIVACY POLICY

Through this Privacy Policy, **HOTEL PANORAMA ALTEA** (hereinafter, we or **Hotel Panorama**) informs you about the personal data we collect, how we treat them, and the rights that our applicable Data Protection regulations grant you in relation to them.

Applicable Data Protection regulations

1. Law 29/2021, of October 28, Qualified Protection of Personal Data of the Principality of Andorra (hereinafter, the **LQPD**);
2. Decree 391/2022, of 28-9-2022 approving the Regulations for the application of the LQPD,
3. Decree 45/2023, of 25-1-2023, approving the Regulation amending the Regulation implementing the LQPD, and
4. Regulation (EU) 2016/769 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with respect to the processing of personal data and the free circulation thereof (hereinafter, the **GDPR**).

In the following table you will find links to facilitate access to the points of this policy that are of interest to you, however, please, you must read all the sections of the [Legal Notice](#), the [cookies policy](#) and this privacy policy before to use this website:

1. [Who does this Privacy Policy apply to?](#)
2. [Who is responsible for the processing of your personal data?](#)
3. [How do we obtain your personal data?](#)
4. [What do we use your data for and on what legal basis do we do it?](#)
 - [To manage your stay at our facilities](#)
 - [To initiate and maintain the relationship with our clients](#)
 - [To preserve security through video surveillance](#)
 - [To create a user account](#)
 - [To manage your reservations](#)
 - [To extract statistics that help us improve our services.](#)
 - [To attend to your requests, queries or claims](#)
 - [To manage tickets to events purchased through our website](#)
 - [To send you information, promotions and discounts of interest to you](#)
 - [To select and hire our staff](#)
 - [To initiate and maintain the relationship with our suppliers](#)
 - [To manage any future claims](#)
 - [To guard and return the objects that you lose in our facilities](#)
 - [To promote our facilities and services](#)
 - [To ensure the proper functioning of our website \(functional cookies\)](#)
 - [To extract aggregate statistics of the use that visitors make of our website \(analytical cookies\)](#)
 - [To send you personalized direct advertising \(advertising cookies\)](#)
 - [To be able to use Google services](#)
 - [To notify you of security breaches](#)

- [For other purposes that are not incompatible with the above](#)
- 5. [With whom can we share your personal data?](#)
- 6. [How long do we keep your personal data?](#)
- 7. [What rights do you have?](#)
 - [Your rights](#)
 - [Where and how you can exercise your rights](#)
 - [Forms for the exercise of your rights](#)
- 8. [What responsibilities do you have?](#)
- 9. [How do we protect your personal data?](#)
- 10. [Modifications of this Privacy Policy](#)

1. Who does this Privacy Policy apply to?

This Policy applies to visitors to this website (our Website), to users of the services that Hotel Panorama offers for the purposes described in section 4 of this Policy, and to all persons whose personal data (for example, their images) may appear on our website or in the context of said services.

2. Who is responsible for the processing of your personal data?

The only controller for the use of your personal data as indicated in the previous section is the owner of this website:

HOTEL PANORAMA ALTEA (Hotel Panorama), with Tax Registration Number U-801522V and registered office at Ctra. de l'Obac, 64 AD700 Escaldes-Engordany, Principality of Andorra.

We have an external Data Protection Officer – [Win2win, SLU](#), company specialized in privacy and personal data protection– whom you can contact by email at protecciodades@andorrapanorama.com.

Hotel Panorama is not responsible for the activities carried out by other websites, even if they are accessed through links on our website. That is why we strongly recommend that you carefully read the information provided by these other controllers before giving them your personal data (especially the privacy and [cookie policies](#) of each website you visit), and that you contact said controller if you have any concerns or questions.

3. How do we obtain your personal data?

In general, it is you who directly provide us with your personal data—for example, when you call us by phone or complete the forms on this website—. The only exceptions to this rule are:

- Your identification data, in the event that you decide to log in using your Facebook account (which acts as an identity provider) instead of filling out the registration form.

- Your image, when eventually collected by our video surveillance cameras.
- The personal data provided to us by third parties who request the services on your behalf (as a beneficiary).
- The contact details provided to us by our service and product providers, if you represent them.
- The last four digits of your credit card, which together with the purchase amount and the operation number, are returned to us by our payment service provider in the event that you wish to consult or revoke the operation.
- The photographs or videos of the events that we organize or in which we participate, and in which you may appear;
- Images or other personal data that correspond to any news in which we consider that the public interest, our obligation of transparency and the right to information prevail over the possible interests of the people whose image or other personal data are published on our website or on our social networks.
- Images that correspond to any content on the website over which we have the corresponding rights.
- Personal data that may appear about you in the emails and instant messaging that we receive, or through the forms on our website; and
- Cookies on this website, about which you will find more information in our cookie policy.

4. What do we use your data for and on what legal basis do we do it?

To manage your stay at our facilities

We collect your data for the purpose of:

- Completing the arrival and departure registration;
- Making copies of all guests' identity documents available to law enforcement authorities for one year;
- Processing your promotional codes and payments;
- Providing you with a consistent and personalized service, advising you on the services you can enjoy at our facilities (based on your previous use or the preferences you have communicated to us);
- Providing you with left-luggage office, safe deposit box and parking services;
- Purchase or reserve services offered by third parties, when you request it and on your behalf (for example, coordinating excursions and other sightseeing tours, requesting taxis or vehicles with a driver, and facilitating reservations at restaurants and events);
- Manage and facilitate access to Wi-Fi, television and other connectivity services (including access to business center services, such as fax and photocopying services) and entertainment systems (such as PlayStation or videos on demand);
- Provide in-room dining service (which includes respecting dietary, health restrictions or any other personal needs that you communicate to us);
- Provide room service (including cleaning, laundry services, and anything you want to request from us for your comfort and that we can offer you, such as, for example, a pillow, a duvet or a mobile phone charger);

- Collect and sometimes publish your opinion about the hotel on our website.
- Charge the tourist tax and, if applicable, the corresponding cancellation fee for your reservation.
- Manage the rest of your requests and inquiries, or your complaints and suggestions; and
- Determine whether you meet the requirements to enjoy products and services that have age restrictions (such as alcohol or adult entertainment in the room).

The bases that legitimize us to process your data in relation to each of the above purposes are the fact that they are necessary for the execution of the purchase contract for your stay in our facilities or the acquisition of third-party services, our legal obligations (for example, regarding the collection of identity documents, the issuance of invoices or the tourist tax), the consent you express when indicating your food preferences, and our legitimate interest in respecting your preferences (for example, in relation to whether you want your room to be near the elevator or on a high floor).

To initiate and maintain the relationship with our clients

We collect your data that we receive orally or in writing directly from you or from a third party who represents you or of which you are a beneficiary, when you contract a service or product with us (for example, a hotel room reservation agreement) for the purpose of preparing the corresponding contract, managing it, providing you with the contracted service and invoicing you.

If you make a payment via POS, we collect the last 4 digits of your payment card along with your payment identifier, date and amount, in order to be able to handle any request for information or refund in relation to this payment. This data does not allow us to identify you and, therefore, if you wish to request something from us in relation to them, you will need to provide us with some data that allows us to link them to you.

Additionally, we inform you that, as a result of this contractual relationship and based on the provisions of article 19.2 of Law 20/2014, of October 16, regulating electronic contracting and operators that carry out their economic activity in a digital space, we may communicate to you orally or in writing commercial information related to the products or services of Hotel Panorama.

The processing of this data is legitimated as being necessary for the execution of the service or product contract in which you are an interested party, and for our legitimate interest in keeping you informed in relation to our products and services.

To preserve security through video surveillance

We collect your image through our video surveillance systems in order to preserve the safety of people, property and our own facilities, and to have video recordings as evidence of possible crimes.

The basis of legitimation for the aforementioned treatments is the public interest in public safety, in accordance with section 3 of article 20 of Law 31/2021, of November

22, consolidated text qualified as public safety and the legitimate interest of Hotel Panorama or affected third parties, when requesting judicial protection regarding a crime that may be accredited by a few minutes of a recording, and our own legitimate interest in avoiding or reducing losses derived from crimes committed in the facilities and the assets they house, protecting the integrity of our workers, increasing safety at work and speeding up the speed of response to serious risks such as fires or theft by third parties.

Finally, the creation of copies and the transfer of these recordings when required by the competent judicial authority or the Police Force of the Government of Andorra for the purposes of investigating criminal or administrative offenses is legitimized by the legal obligation imposed on us by section 4 of article 24 of the aforementioned Law 31/2021, on public security.

To create a user account

We collect the data you provide when you register on our website to create a personal account with which to facilitate the management of your reservations or purchases and the evaluation of our services, as well as to control access. Among other advantages, the account will save you from having to provide your personal data every time you make a reservation or purchase.

The basis that legitimizes this processing activity is the execution of the user contract that you sign upon completion of registration.

To manage your reservations

We collect the data you provide us in relation to the reservation to formalize it and communicate to you by email or telephone any related information that may be of interest to you, as well as to manage and issue documents proving the reservation and any related communication

The basis that legitimizes these treatments is the purchase contract or reservation agreement that you sign when you complete the corresponding form, send us an email or message, or confirm the data that you have provided us orally (in person or by telephone).

To extract statistics that help us improve our services.

We use the data you provide us in the forms on this website with the aim of extracting aggregate statistics (in which it is not possible to identify any specific person) with the aim of improving the services we offer you.

The basis that legitimizes us to process your data for this purpose is our legitimate interest in improving our economic results and, simultaneously, the services we offer you.

To attend to your requests, queries or claims

We collect the personal data that you provide us in your emails, by phone, or through the form on the contact page or the requests for the exercise of rights, to attend to your requests, queries or claims in relation to our services, or to attend the rights that you have about your personal data.

The legal basis for these treatments is our legal obligation to respond to your requests for rights, and, for other purposes, our legitimate interest in responding to them. The provision of your personal data is, therefore, voluntary, although if you do not provide them to us we will not be able to process your request, query or complaint. You may object to our legitimate interest whenever you wish, although, equally, such opposition will make it impossible to continue processing your request, query or complaint.

To manage tickets to events purchased through our website

We collect the data you provide us in relation to the reservation or purchase of tickets to process your purchase and communicate to you by email or telephone any related information that may be of interest to you, as well as to manage and issue documents proving the purchase of tickets and any related communication.

The basis that legitimizes these treatments is the purchase contract or the reservation agreement for the product or service that you sign when completing the purchase or reservation.

To send you information, promotions and discounts of interest to you

We collect your email address when you subscribe to our commercial communications service (newsletters), or when you purchase our services, to inform you about news, events, exclusive content and tips so that you can make the most of our services.

If you have subscribed through our website, the legal basis for this processing is your consent, and you can withdraw it at any time by exercising your right as indicated later in this policy, or through the link at the bottom of each email. The only consequence of withdrawing consent is that you will no longer receive the information we sent you by email.

If you receive the information because you have purchased one of our services, the legal basis for this processing is our legitimate interest in keeping you informed about our services related to those you have purchased, to which you may object at any time, as in the previous case and with identical consequences, exercising your right as indicated later in this policy or through the link that is, for this purpose, at the foot of all our emails.

To select and hire our staff

We process the data from the CV that you voluntarily send us and that we may collect during interviews, as well as the references you provide us with, if you authorize us, to manage the relationship with you regarding your candidacy for a job at Hotel Panorama,

including the process of searching, filtering and storing your CV as a potential candidate, the personnel selection process and the hiring process.

The basis for legitimation for the aforementioned treatments is your consent, which you express when sending us your CV or attending an interview, as they are necessary for the execution of pre-contractual measures if you request them from us, and if we do not have an open selection process or you are not hired and we consider that you may fit into future selection processes, our legitimate interest in keeping your CV for the purpose of including it in future selection processes. You can withdraw your consent or oppose our legitimate interest as indicated in section 7 of this policy, and, if you do so, there will be no effect other than the destruction of your CV (if you withdraw your consent) or the limitation of its conservation to the selection process for which you have sent it to us.

We inform you that we share your CV with Serveis Administratius CRJM, SLU (another company that is part of our entity) and that the basis for legitimizing this transfer of data is our legitimate interest in offering you the possibility of becoming part of the staff of this other company that is closely linked to us. You can oppose this transfer as indicated in section 7 and, if you do so, there will be no other repercussions than not being able to apply for any job positions that may be vacant in this other company.

To initiate and maintain the relationship with our suppliers

If you represent a provider of products or services, we collect your contact details and your signature to:

- a) Manage our relationships of all kinds with the supplier you represent.
- b) Manage the corresponding file of our list of authorized suppliers.
- c) Manage the budgets and invoices of the provider you represent.

The processing linked to the purposes a) and b) are legitimized by the employment or service contract that you have signed with the provider you represent and our legitimate interest in contacting them. And the treatments linked to the purpose c) are legitimized to be necessary for the execution of the contract or contracts that you have signed with us.

To manage any future claims

We keep blocked the data that may be necessary to manage your possible claims, or ours, based on our legitimate interest in defending ourselves to safeguard our rights.

To guard and return the objects that you lose in our facilities

If you have lost a mobile phone or any other object that contains personal data, we will keep said personal data until the legitimate owner of the lost object successfully claims it at our customer service point or, after a reasonable time, we deliver it to the police authorities so that they are the ones who manage their custody and eventual return.

The basis that legitimizes us to process personal data from mobile phones, wallets, backpacks and other objects that may contain personal data in this way is our legitimate interest in preventing their theft and returning them to you.

To promote our facilities and services

We may record graphically the atmosphere of our facilities to promote our premises and its services and, eventually, your image may appear in this graphic material to then use them in promotional campaigns or publish them in media such as our website or our social networks.

The legal basis for the processing of your images is our legitimate interest, to which you can object at any time if you consider that it is contrary to your own interests. In order to be able to assess your opposition against our legitimate interest, and if necessary, immediately remove the images that identify you, we will ask you to indicate where you have seen them.

To ensure the proper functioning of our website (functional cookies)

We use functional cookies to ensure the proper functioning of our website.

As these cookies are necessary for the proper functioning of the website, their use does not require you to give us your consent, and the basis that legitimizes us to use them is our legitimate interest in being able to offer you the services of our website.

You can find more information about these cookies in our [cookie policy](#).

To extract aggregate statistics of the use that visitors make of our website (analytical cookies)

We use analytical or statistical cookies to identify the most and least visited pages, analyze what content is of greatest interest to our visitors, and measure the success of our information campaigns, all with the aim of improving the services we offer you through the Web. All these purposes provide aggregated results, in which it is not possible to identify the interests of any specific person.

As these are non-necessary cookies, we will not use them until we have your consent, and not giving it to us or withdrawing it will have no effect other than hindering our goal of improving the website by analyzing aggregate statistics of our visitors' browsing.

However, the law regulating electronic procurement and operators who carry out their economic activity in a digital space requires that, when the website is dedicated, among other things, to carrying out an economic activity in the digital space, or if the data collected by statistical cookies is shared with third parties, the data controller may only use the data from statistical cookies or transfer them to third parties with your consent. If this is the case for our website, we will ask for your consent before using your data, and the fact of not giving it to us or withdrawing it will have no more effect than to

hinder our purpose of improving the website through the analysis of aggregate statistics of our visitors' browsing.

You can find more information about these cookies in our [cookie policy](#).

To send you personalized direct advertising (advertising cookies)

We use our own and third-party advertising cookies to send you personalized advertising, from us or from our partners.

As these are non-necessary cookies, we will not use them until we have your consent, and not giving it to us or withdrawing it will have no more effect than that your visit to our website cannot be used to improve the interest of the advertising you receive.

You can find more information about these cookies in our [cookie policy](#).

To be able to use Google services

Additionally, as an obligation that Google LLC, a company of which Google Ireland Ltd is a subsidiary, imposes on entities that, like us, use Google Analytics tools, we inform you that these two services are operated by Google Inc., domiciled at 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, and that Google Inc. is a beneficiary party of these services.

The information generated by the cookies about your use of this website and your advertising preferences is generally transmitted to a Google server in the USA and stored there. If you would like to obtain more information, you can consult the [page describing how Google uses information from our website](#) and/or [the Google privacy policy](#) regarding the aforementioned services.

We would like to inform you that we have activated the IP anonymization function in the Google service in order to add additional safeguards to the standard contractual clauses that protect this international data transfer to the USA. With this, Google will shorten your IP address before transmitting it to the USA (obfuscation process of your identity). Only in exceptional cases is the full IP address sent to a Google server in the USA and shortened there. Google guarantees that the IP address transmitted by your browser to Google Analytics will not be processed together with any other data held by Google.

You can view the categories of personal data processed by these services at privacy.google.com/businesses/adsservices.

To notify you of security breaches

At Hotel Panorama we assume security measures appropriate to the level of risk to protect personal information against loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information; however, if we determine that personal data

has been misappropriated (including by an employee or former employee of Hotel Panorama), exposed by a security breach, or improperly acquired by a third party, exposing data subjects to high risk, we will inform those data subjects immediately about this security breach, misappropriation or acquisition, and about the measures we have taken and those that are recommended to the data subject so that the breach does not affect them.

The basis that legitimizes this treatment is the legal obligation set forth in article 37 of the LQPD and 34 of the GDPR, and our legitimate interest in preventing this security breach from harming data subjects.

For other purposes that are not incompatible with the above

We may use your personal data for other purposes that are not incompatible with those indicated above (such as archiving purposes for reasons of public interest, scientific or historical research purposes, or statistical purposes) provided that it is permitted by the regulations in force for what regards personal data protection, and, of course, acting in accordance with these and with the rest of the applicable regulations.

5. With whom can we share your personal data?

We do not share with anyone your personal data, unless:

- You are the one who requests it.
- We have a legal obligation to do so.
- Is necessary to enforce the terms and conditions of our services, including investigating potential violations.
- Is necessary to detect, prevent, or otherwise address fraud, security, or technical issues.
- We act as intermediaries, for example, when we need to make a reservation on your behalf (for example, an activity or a show).
- Contract our products or services through intermediaries (for example, a travel agency) to whom we must deliver services purchased on your behalf, either with the consent you have given them, so that they legally represent you, or because you have explicitly authorized us to do so.
- We are jointly responsible for the collection of data, so that, always with your consent, other entities can process it on their own behalf. This is the case of:
 - Other advertising companies that publish their own advertisements in the spaces designated for this purpose on our website. We are jointly responsible for the collection of your personal data through their cookies, provided that you consent to it, since, without our website, this data would not be collected. These third parties use them to show you more personalized advertisements according to the interests that can be deduced from your browsing on the Internet. In our cookie policy you will see which advertising cookies we offer and how to configure them.
- We need to protect your rights, ours, our employees' rights, or those of third parties (which may require disclosure to the police for security reasons or to

health authorities to prevent the spread of disease, for example, for contact tracing purposes). For example:

- If our video surveillance cameras record a theft at our facilities, or
- If a third party requests video surveillance images from us based on their legitimate interest in requesting effective judicial protection regarding the commission of a crime or compensation for damages that the images provided prove, and with the commitment of said third party to use them exclusively for the reporting of said crime or for the claim for damages suffered, and reducing the transfer of images to the minimum and essential to fulfill the intended purpose.
- A company subcontracted by us needs to process them on our behalf (for example, the company that provides us with data protection delegate services, and that must attend to your requests for rights), always under the terms and conditions of the corresponding processing contract.
- We need to protect or defend the rights or property of Hotel Panorama.

No international transfer of personal data is planned, and, if we eventually need to carry it out, we inform you that we will comply with the provisions of the regulations in force that apply to us at all times, and preferably, by selecting suppliers that guarantee that they only transfer your data when the recipient countries offer a level of protection equivalent to that provided for by Andorran law, in accordance with article 43 of the LQPD.

6. How long do we keep your personal data?

In general, Hotel Panorama retains your personal data exclusively for the duration of the treatments that require them and, then, for as long as it takes to prescribe the legal responsibilities that apply to us at any given time, derived from the treatment in question (including the obligation to be able to demonstrate that we have complied with your request for the destruction of personal data).

The personal data that we process as necessary for the execution of a contract (art. 6.1.b of the LQPD) will be kept as long as there is a mutual interest in maintaining the purpose of the processing and for the maximum legal period permitted by data protection legislation, including the limitation periods for legal actions to address possible liability that may arise from the contractual relationship. When it is no longer necessary for any purpose, it will be deleted with appropriate security measures to guarantee its destruction.

The personal data that we process due to legal obligation (art. 6.1.c of the LQPD) will be kept as long as we are subject to it.

During the retention periods established to formulate or respond to possible complaints and/or the retention periods provided for by law, personal data will remain blocked and will only be made available to auditors, competent Public Administrations and the City Council, upon official request.

When personal data is no longer necessary for any purpose, it will be destroyed with security measures appropriate to its sensitivity¹.

For example, we will keep video surveillance recordings for a maximum of 30 days when they do not contain incidents, and, if exceptionally a security incident has occurred during this period or there are indications of the commission of a crime (for example, a robbery), we will extract a copy of the part of the recording that contains the incident, which will be kept until it is delivered to the police or to the interested party involved who requires it from us to prove their request for judicial protection.

We will destroy your CV when it is more than two years old, as we consider it to be out of date in relation to the activity in which you are engaged.

We will destroy any unnecessary or disproportionate personal data that may appear in emails and instant messaging we receive, or through forms on our website as soon as we receive it.

We will destroy (and rectify) any personal data we find inaccurate as soon as we verify its inaccuracy.

If you send us a copy of an identity document, we will destroy this copy as soon as we have verified that it fulfills the function for which you sent it to us.

When we no longer have a legitimate purpose for processing some of your personal data, we will delete or anonymize it, and if this is not possible (for example, because it is in backup copies), we will store it securely and block it to isolate it from any further processing until it is possible to delete it.

7. What rights do you have?

You have the right to obtain confirmation as to whether or not Hotel Panorama has any personal data of you.

We remind you that when you share personal data with other controllers, you must exercise your rights directly against those controllers, following the instructions provided in their own privacy policies. Specifically, in relation to the data that our cookies share with Google, we inform you that you can install in your browser Chrome, Internet Explorer, Safari, Firefox and/or Opera, the [plugin to not send Google Analytics data to Google Inc.](#)

Next, we explain what other rights you have and how to exercise them.

¹ Ability to harm the interested party if the data loses its confidentiality, integrity or availability

Your rights

In accordance with the provisions of the LQPD and the GDPR, you can request the execution of the following rights:

- [Access to your personal data](#).
- [Rectification of any of your personal data](#), specifying the reason.
- [Erasure of some or all of your personal data](#).
- [Limitation of the processing of your data](#), specifying the reason for the limitation.
- [Opposition to the processing of your personal data](#).
- [Portability of your data](#) when the legitimacy basis for its collection has been your consent or a contract.
- [Right not to be subject to automated individual decisions](#).

Where and how you can exercise your rights

You can exercise your rights:

1. By sending a written request, addressed to Hotel Panorama at our postal address indicated in section 2 of this policy, indicating a means of contact to be able to respond to your request, or request more information if necessary. We would appreciate it if you would indicate us in the envelope "Exercise of Personal Data Protection Rights".
2. By sending the form associated with the right you wish to exercise, or a message containing said information, to the email address protecciodades@andorrapanorama.com, indicating in the subject "Exercise of Personal Data Protection Rights". You will find these forms later, in this same section of this privacy policy.

In both cases, if it is not possible for us to verify that you are who you say you are, we will ask you to please send us proof of your identity, and thus ensure that we only respond to the data subject or his/her legal representative.

If the person sending the mail does so as a representative of the data subject, the accreditation of the representative must be done through documents or legal instruments that correctly identify the data subject and the representative and specify the assignment or the procedure by which delegate representation.

Likewise, if you consider that you have not obtained full satisfaction in the care of the exercise of your rights, we inform you that you can file a claim with the national control authority of your country, or by contacting the Andorran Data Protection Agency for this purpose ([APDA](#)).

Forms for the exercise of your rights

In order to facilitate the exercise of your rights, we recommend that you use the corresponding application forms from among the following:

- [Form for exercising the right of access](#)
- [Form for exercising the right of rectification](#)

- Form for exercising the right to object ([model A](#), and [model B](#))
- [Form for exercising the right of erasure](#)
- [Form for exercising the right to limitation of processing](#)
- [Form for exercising the right to portability](#)
- [Form for exercising the right not to be subject to automated individual decisions](#)

8. What responsibilities do you have?

By providing us with your data, you guarantee that they are accurate and complete. Likewise, you confirm that you are responsible for the veracity of the personal data that you have communicated to us and that you will keep them conveniently updated so that they respond to your real situation, holding you responsible for false or inaccurate personal data that you may provide us, as well as for the damages, direct or indirect, that may arise from your inaccuracy.

You cannot provide us with personal data of other people unless it is justified in relation to the services you request from us. In any case, if you provide us with the personal data of third parties, you assume the responsibility of informing said third parties before providing us with their personal data. This information that you must provide to third parties whose data you provide us, must include all the provisions set forth in this privacy policy, and it is you who is responsible for the legality of this personal data and for transmitting it to its owners whose rights they have in relation to your personal data.

In the cases in which you have to provide us with personal data of a minor under 16 years of age or of a person who has limited rights, by doing so you are obliged to have the authorization of the holders of their parental authority or guardianship. Without this authorization, it is forbidden for you to provide us with any personal data of these people.

9. How do we protect your personal data?

We are fully committed to protecting your privacy and personal data. We have prepared a record of all the personal data processing activities (ROP) that we carry out, we have analyzed the risk that each of these activities may pose to you, and we have implemented the appropriate legal, technical and organizational safeguards to avoid, as far as possible, the alteration of your personal data, its misuse, loss, theft, unauthorized access, or unauthorized processing. We keep our policies up to date to ensure that we provide you with all the information we have about the processing of your personal data, and to ensure that our staff receive the appropriate guidelines regarding how they should treat your personal data. We have signed data protection clauses and or data protection agreement with all our service providers, taking into account the need that each one has to process personal data.

We restrict access to personal data to those employees who really need to know it to carry out any of the processing activities referred to in this policy, and we have trained and made them aware of the importance of confidentiality and maintaining the integrity

and availability of information, as well as on the disciplinary measures that any possible infraction in this matter would imply.

However, if we determine that your data has been misappropriated (including by an employee or former employee of Hotel Panorama), exposed by a security breach, or improperly acquired by a third party, exposing you to high risk, we will notify you immediately about this security breach, misappropriation or acquisition, and about the measures we have taken and those that we recommend you take so that the breach does not affect you or affects the minimum.

10. Modifications of this Privacy Policy

We may make changes to this policy from time to time (a) where such changes are necessary to comply with the data protection regulations applicable to us, or (b) where the changes: (i) are commercially reasonable; (ii) do not result in a material reduction in the level of security provided by Hotel Panorama for personal data; and (iii) do not otherwise have a material adverse impact on the rights of interested persons or any entity related to them under this policy.

If the changes are substantial, we will notify you before they become effective by sending you a notification or by posting a prominent notice on this website, and you will have the option to exercise your rights as we informed you in a previous section. In any case, we recommend that you periodically review this privacy policy to know how we protect your personal data.

If you have any questions about this policy, do not hesitate to contact us by sending an email to protecciodades@andorrapanorama.com.

Last update: May 2, 2025