

## **PRIVACY NOTICE SPA**

### **A. Identity of the Controller**

GRUPO POSADAS, S.A.B. de C.V. and its affiliates and/or subsidiaries and/or Infiniti Caribe N.V. for the marketing of the products and/or services that Posadas manages and/or distributes (hereinafter, Posadas), with address at Av. Prolongación Paseo de la Reforma 1015, Torre A Piso 9, Col. Santa Fe de Cuajimalpa, Cuajimalpa, 05348, Mexico City; is a company committed to protecting your privacy. Our Data Protection Officer is the Personal Data Compliance Area and is located at the same address, you can contact them at the email: [datos.personales@posadas.com](mailto:datos.personales@posadas.com)

### **B. Personal Data**

Posadas may collect your personal information when the information is provided directly by you:

1. **Identification Data:** name, last name, phone number, age, email address, preferences and special requirements of spa service.
2. **Sensitive Personal Data:** Health status.
3. **Authentication:** Autograph and electronic signature

### **C. Sensitive Personal Data**

Personal data is classified as sensitive when it involves an individual's most closely held details or when its misuse may potentially lead to discrimination or pose a risk of discrimination. When you stay in one of our hotels, and you provide any information concerning your health or any disabilities, this data will only be used to serve you better and to meet your specific needs.

In case of health emergency (s), Posadas, in terms of the applicable regulations, will collect data related to your state of health with the sole purpose of achieving the health protection of you and the other people who are in the hotel or in any property managed by Posadas, information that will only be kept for the time necessary to fulfill this purpose.

### **D. Purposes of the Data Processing**

Posadas will be used your personal information in order to provide you services of massages, facials or body treatments on the SPA.

### **E. Limit the Use or Disclosure of Personal Data**

For limit the use and disclosure of Personal Data we offer the following media:

1. In the event that you are a resident of the United Mexican States, your registration in the Public Registry to Avoid Advertising, which is in charge of the Federal Consumer Attorney, so that your personal data is not used to receive advertising or promotions of goods or services companies. For more information, you can consult the PROFECO internet portal, or get in direct contact with it.
2. Send request to the email [datos.personales@posadas.com](mailto:datos.personales@posadas.com), indicating the email (s) and / or telephone number (s) that require limitation.

### **F. The Exercise of the Rights of Access, Rectification, Cancellation and Opposition**

Access, rectification, cancellation or opposition regarding the information you provide to Posadas indicated in the Federal Law on Protection of Personal Data Held by Private Parties, or in any applicable regulation, may be done by submitting the written request to the Area of Personal Data Compliance at the following address: Av. Prolongación Paseo de la Reforma 1015, Torre A Piso 9, Col. Santa Fe de Cuajimalpa, Cuajimalpa, 05348, Mexico City; from 9a.m. to 2p.m. from Monday to Friday, or to the email [datos.personales@posadas.com](mailto:datos.personales@posadas.com).

Such request must contain at least the following: (i) Name of the Owner of the Personal Data; (ii) Email to receive notifications; (iii) Documents that prove your identity or, where appropriate, the legal representation of the owner; (iv) Clear and precise description of the personal data with respect to which you seek to exercise the right and the right that you intend to exercise. (v) Any other element or document that facilitates the location of personal data. In the event that the request does not meet any of the requirements indicated above, the Department of Personal Data may require you within 5 days of receiving the request to provide the elements or documents necessary to process it. You will have 10 days to attend to the request, if you do not respond within that period, the corresponding request will be considered not submitted.

The terms of attention, unless the applicable regulations indicate otherwise, will be a maximum of 20 days from the date the request is received to communicate the determination adopted, so that, if appropriate, make it effective within the 15 days following the issuance of the response. The aforementioned terms may be extended only once for an equal period, as long as the circumstances of the case justify it.

In order to protect your confidentiality, Posadas will send the response to your request to the email you have provided for this purpose and will keep it available to the applicant at the address indicated in the previous paragraph.

### **G. Of the Revocation of the Consent for the Use of your Personal Data.**

You can revoke the consent you have given us for the processing of your personal data. It is important that you bear in mind that not in all cases Posadas will be able to respond to your request or conclude immediately, since it is possible that due to some legal obligation it is required to continue treating your personal data. Likewise, you should consider that, for certain purposes, the revocation of your consent will imply that we cannot continue to provide the service you requested, or the conclusion of your relationship with Posadas.

To revoke your consent, you must submit your request in writing to the Personal Data Compliance Area at the following address: Av. Prolongación Paseo de la Reforma 1015, Torre A Piso 9, Col. Santa Fe de Cuajimalpa, Cuajimalpa, 05348, Mexico City; from 9a.m. to 2p.m. from Monday to Friday, or to the email [datos.personales@posadas.com](mailto:datos.personales@posadas.com).

The processing of such request and the attention of the same will be carried out in accordance with the provisions of Subsection F, above

### **H. Control and Security of Personal information.**

Posadas undertakes to take the necessary measures to protect the information collected, using security technologies and control procedures in the access, use or disclosure of your personal information without authorization, for example, by storing the personal information provided on servers located in Centers of Data that have limited access controls. For online transactions, we also use security technologies that protect personal information that is transmitted to us through various electronic means such as the use of a secure server under the Secure Socket Layer (SSL) protocol.

However, no security or data transmission system of which the company does not have absolute control and/or has dependence on the internet can guarantee that it is totally secure.

### **I. Image Usage**

Posadas will be able to make recordings or take photographs for security and quality purposes in the service.

The capture of your's image will be used by Posadas as a control and security measure, prevention of illicit acts in general, and especially with respect to the property, its contents and the people who are in it.

### **J. Transfers**

Posadas only transfers personal data in the following cases:

1. In the case of Mexico, in the cases established in article 37 of the Federal Law on Protection of Personal Data Held by Private Parties. Among them is by way of example: that it is foreseen in some Law; for healthcare; for the enforcement of justice, for the fulfillment of a legal relationship between the controller and the owner and between holding companies and subsidiaries.
2. In the cases in which another international standard is applied, it will only be transferred in the cases indicated therein.

### **K. Period of conservation of personal data.**

Your personal data will be kept as long as the legal relationship with you is maintained, until it is satisfactorily concluded, and you do not exercise your right of deletion or until you revoke your consent. In any case, the period of conservation of personal data will be restricted to the minimum necessary, so that they will only be kept as long as the purpose for which they have been collected is maintained. When its conservation is no longer necessary, Posadas will keep any data that may be necessary during the legally established deadlines to attend to any question related to its treatment or the legal relationship originated with you. After the legal deadlines, the personal data will be deleted adopting the appropriate security measures that guarantee their total destruction.

### **L. Changes to this Privacy Notice**

Posadas may at any time update this privacy notice. In the event of substantial changes to this notice, we will communicate it through our internet pages indicated in section A of this Posadas may update this privacy notice at any time. In the event that substantial changes occur to this notice, we will communicate it through our internet pages indicated in subsection A of this Privacy Notice. Therefore, we suggest you visit this privacy notice periodically to be aware of any updates.

I acknowledge and accept the terms and conditions established in this Privacy Notice, and otherwise I will communicate it to Posadas in terms of what is indicated in subsections E, F and G. of this Privacy Notice.

In case of any grievance or complaint about the treatment of your personal data, in addition to contacting the responsible party in accordance with this notice, you can contact the National Institute of Transparency, Access Information and Protection of Personal Data in Mexico, or to the competent authority in the event that a regulation different from the Mexican is applied.