

## **PRIVACY NOTICE SPA**

### **A. Identity**

The data controller responsible for your information is Grupo Posadas, S.A.B. de CV and its affiliates and / or subsidiaries (collectively, as Posadas), 1015 Prolongación Paseo de la Reforma, 9th Floor, Col. Santa Fe de Cuajimalpa, Delegación Cuajimalpa, CP 05348, Mexico City, is a company committed to protecting your privacy. Our Data Protection Officer is the Compliance Area, you can contact him online 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, email address, preferences and special requirements of spa service.
2. **Sensitive Personal Data:** Health

### **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.

Due to the health emergency (Covid-19), Posadas will collect data related to your health in order to prevent the spread of the Covid-19 virus, according to the provisions of article 10 sections V and VI of the Federal on Protection of Personal Data Held by Private Parties; this information only be kept for the necessary time to fulfill said 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:

- Register your number in the "Procuraduría Federal del Consumidor" in the following address <https://repep.profeco.gob.mx/>
- Send an email to [datos.personales@posadas.com](mailto:datos.personales@posadas.com), with the email or phone numbers you want to block

### **F. Rights of Data Owners**

You are able to exercise your rights of access, rectification, cancellation and objection to the information you provided to Posadas, under Federal Law on Protection of Personal Data Held by Private Parties. You may do so by delivering the request on the following address: 1015 Prolongación Paseo de la Reforma, 9th Floor, Col. Santa Fe de Cuajimalpa, Delegación Cuajimalpa, CP 05348, Mexico City or by email at: [datos.personales@posadas.com](mailto:datos.personales@posadas.com).

Any such requests must include at least the following items: (i) The data owner's name and address or other means to notify him of the response to this request; (ii) Documents establishing the identity or, where appropriate, legal representation of the data owner; (iii) A clear and precise description of the personal data with regard to which the data owner seeks to exercise any of the abovementioned rights; (iv) Any other item or document that facilitates locating the personal data. If the request is missing any of these requirements, the Compliance Area of Personal Data may respond within 5 days of your request and ask that you provide the required information or documents. In this event, you will have 10 days to submit the needed information or documents. If you do not respond with the missing items in that timeframe, no further action will be taken and no changes will be made to your personal data or their usage.

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. Revocation of Consent**

Consent may be revoked at any time. However, it is important to consider that in some cases it will not be possible to answer the request immediately due to some legal obligation. Also, the revocation of consent may be causing the termination of the service provided.

For revocation of consent you may do so by delivering the request on the following address: 1015 Prolongación Paseo de la Reforma, 9th Floor, Col. Santa Fe de Cuajimalpa, Delegación Cuajimalpa, CP 05348, Mexico City or by email at: [datos.personales@posadas.com](mailto:datos.personales@posadas.com).

The process for the attention of the request will be carried out in the same way as indicated in subsection F, above

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

Posadas agrees to take necessary precautions to protect the data it has collected, utilizing security technologies and procedures to restrict access, use, or disclosure of personal data without consent.

However, no security system or data transmission devices over which Posadas does not retain absolute control or is dependent on the Internet can be guaranteed to be totally secure.

### **I. Transfer of Personal Data**

Posadas only transfers personal data in the following cases:

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

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

Posadas may update this privacy notice at any time. In the event that substantial changes are made to our notice, we will notify you through this document.

I have been duly advised of the contents of the Privacy Notice. I agree and accept the terms of use about my sensitive personal data of this Privacy Notice.

In case of any disagreement or complaint about the treatment of your personal data, you can contact the Nacional Institute for Transparency, Access to Information and Data Protection in Mexico.

**Date of last revision: October 27, 2020.**