

PRIVACY POLICY

1. Initial information

BE LIVE HOTELES & RESORTS S.L. considers your personal information to be very important. For this reason, we process it in a confidential and secure manner. We are committed to ensuring the privacy of personal data at all times and to not collecting unnecessary information.

Access to our website does not require prior registration. If you need further information, you may contact us through the form available on our website, provided that you agree with our Privacy Policy, which you must accept in order to expressly consent to the processing of your data for the purposes indicated.

In accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), as well as with Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights, we hereby provide you with information regarding the processing of your data through this Privacy Policy.

2. Who processes the data?

Identity: BE LIVE HOTELES & RESORTS S.L.

Tax ID number: A38083101

Registered office: Calle Santa Rosa 5 (apartments Royal Palm, urbanization Oasis del Sur), Arona, 38650, Tenerife.

Email address: gdpr@onahotels.com

3. Joint controllership of processing

Users are informed that the management of CVs is carried out under a joint controllership regime by the companies forming part of the ONA Group, which act as Data Controllers:

- Clubotel La Dorada, S.L.
- Apartur Marinas de Nerja, S.L.
- Galatea Marbella, S.L.U.
- Ona Campanario Management, S.L.
- Cala Pi Maintenance, S.L.
- Inmobiliaria Aucanada, S.L.
- Excel Hotels & Resorts, S.A.U.
- Wimpen Leisure Management, S.A.
- Bahía Blanca Leisures, S.L.
- Ogisaka Costa Blanca, S.L.
- Be Live Hoteles & Resorts S.L.

4. What data do we collect, for what purposes, and for how long?

DATA PROCESSING	PURPOSE AND LEGAL BASIS	RETENTION PERIOD
Website operation	To manage the proper functioning of the website, as well as its operation: personal data will be processed strictly to the extent necessary for the purpose of providing and ensuring the security of the application and the	The data collected will be retained for the time strictly necessary to fulfil the purpose for which it was collected and, in any case, to determine any potential liabilities that may arise from this purpose, taking into account

DATA PROCESSING	PURPOSE AND LEGAL BASIS	RETENTION PERIOD
	information, the legal basis being the legitimate interest pursued by the controller, in accordance with Art. 6(1)(f) GDPR.	the periods established in the applicable regulations.
Members area	Data will be processed for the purpose of managing membership documents, as well as sending Club news and newsletters, in accordance with Art. 6(1)(b) GDPR and Art. 21.2 of the LSSI-CE, respectively.	Data will be retained until the request has been resolved. In any case, they may be retained to determine any potential liabilities that may arise from this purpose.
Contact	To respond to requests and/or enquiries made by the user, the legal basis for processing expresses consent in accordance with Art. 6(1)(a) GDPR.	Data will be retained until the request has been resolved. In any case, they may be retained to determine any potential liabilities that may arise from this purpose.
Payment of maintenance fees	Personal data will be processed for the purpose of managing the payment process and complying with contractual and legal obligations arising as a member, the legal basis being the contractual relationship pursuant to Art. 6(1)(b) GDPR, as well as legal obligation pursuant to Art. 6(1)(c) GDPR.	The data collected will be retained for the time strictly necessary to fulfil the purpose for which it was collected and, in any case, to determine any potential liabilities that may arise from this purpose, taking into account the periods established in the applicable regulations.
Sending informational communications of the entity and Newsletter	Subscription to news, promotions and offers of the entity, the legal basis for processing being express consent in accordance with Art. 6(1)(a) GDPR.	Data will be retained for as long as the Newsletter subscription remains active or until the data subject exercises the right to object or to erase the data. In any case, they may be retained to determine any potential liabilities that may arise from this purpose.
Email management	The purposes of data processing are responding to enquiries received, as well as managing the commercial and/or professional relationship, the legal basis being the contractual relationship between the Data Controller and the data subject, in accordance with Art. 6(1)(b) GDPR.	The data collected will be retained for the time strictly necessary to fulfil the purpose for which it was collected and, in any case, to determine any potential liabilities that may arise from this purpose, taking into account the periods established in the applicable regulations.
Work with us	Data will be processed for the purpose of processing and including your application in a database to be part of the selection process, as well as receiving information about any vacancies offered. Processing of personal data is legitimized by express consent in accordance with Art. 6(1)(a) GDPR.	Data will not be retained for longer than necessary for the purposes for which it was collected, unless there is a legal obligation. In such case, it will be retained for a maximum period of one year.

5. To whom will the data be disclosed?

Unless we are subject to a legal obligation requiring us to disclose your personal data, or unless you have given us your express consent, we will not transfer your personal data to third parties.

Users are informed that **BE LIVE HOTELES & RESORTS S.L.** forms part of a group of companies under the brand **Ona Hotels & Apartments**, whose main establishment is **CLUBOTEL LA DORADA, S.L.**, where data is stored and managed. The legal basis for such data transfers within the group is the legitimate interest in transmitting personal data within the business group for internal administrative purposes.

6. Are international data transfers carried out?

No international data transfers to third countries outside the European Union are carried out.

7. What rights do you have as a user and how can you exercise them?

7.1 Right of access

As a user, you may ask us to explain what we do with your personal data.

You may also request information about the purpose of processing your personal data, how long we retain it, what rights you have as a user, whether your data has been transferred to a third country or international organization, the existence of automated decisions or profiling, among others.

7.2 Right to rectification

If the personal data you have provided is inaccurate or incomplete, you have the right to have it rectified or completed. Please contact us and we will rectify the data you request.

7.3 Right to restriction of processing

You may request restriction of the processing of your personal data when:

- You contest the accuracy of your personal data for a period enabling us to verify its accuracy.
- Processing is unlawful and you oppose the erasure of the data and request restriction instead.
- We no longer need the data for processing purposes, but you need it for the establishment, exercise or defense of legal claims.

7.4 Right to erasure

You may request the immediate deletion of your personal data. We are obliged to erase such data without undue delay when it is no longer necessary for the purposes for which it was collected. You may also request erasure when you withdraw consent, object to processing and there are no overriding legitimate grounds, data has been processed unlawfully, must be erased to comply with a legal obligation, or was obtained in connection with a lawful offer.

7.5 Right to information

If you have exercised your right to rectification, erasure or restriction, we are obliged to inform all recipients to whom your personal data has been disclosed of such rectification, erasure or restriction, unless this proves impossible or involves disproportionate effort.

You also have the right to be informed about who these recipients are.

7.6 Right to data portability

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format.

You also have the right to transmit such data to another controller without hindrance.

7.7 Right to object

As a user, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you.

We will cease processing unless we have compelling legitimate grounds that override your interests, rights and freedoms or unless processing is necessary for the establishment, exercise or defense of legal claims.

7.8 Right to withdraw the declaration of consent relating to data protection

As a user, you have the right to change your declaration of consent regarding data protection at any time. Such withdrawal shall not affect the lawfulness of processing carried out prior to withdrawal.

7.9 Automated individual decisions, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.

7.10 Right to lodge a complaint with a supervisory authority

As a user, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data infringes the GDPR.

7.11 Where can you exercise your rights?

Users may request the exercise of their rights at the following email address: gdpr@onahotels.com.

Likewise, for the purpose of facilitating the exercise of the rights established in Articles 15 to 22 of Regulation (EU) 2016/679 General Data Protection Regulation and Articles 12 to 18 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights, and without their use being mandatory, a set of request forms for the different rights is made available to data subjects:

- [Access](#)
- [Objection](#)
- [Erasure](#)
- [Restriction of Processing](#)
- [Rectification](#)
- [Portability](#)

8. Is it mandatory to provide all the information requested in data collection forms?

With regard to the Website forms, you must complete the fields marked as “required”. Failure to complete the required personal data, or completing it only partially, may mean that **BE LIVE HOTELES & RESORTS S.L.** cannot process your requests and, consequently, **BE LIVE HOTELES & RESORTS S.L.** will be exempt from any liability for the non-provision or incomplete provision of the requested services.

The personal data provided by the User to **BE LIVE HOTELES & RESORTS S.L.** must be up to date so that record information is updated and error-free. The User will be responsible for the truthfulness of the data provided.

9. What security measures have we implemented?

We inform you that we process and protect your personal data in accordance with current regulations on data protection and information society services.

We have implemented the necessary technical and organizational security measures to ensure the security of users’ personal data and to prevent its alteration, loss, unauthorized processing or access, in accordance with the state of the art, the nature of the stored data and the risks to which it is exposed, whether arising from human action or from the physical or natural environment, in compliance with applicable regulations.

Access

Data Controller details

- **Company name:**
- **Address:**

Applicant's details

Mr./Ms., of legal age, with address at no., Town/City Province Postcode with National ID (DNI), a photocopy of which is attached, hereby states their wish to exercise their right of access, in accordance with Article 15 of Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as Article 13 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Requests

1. That the Data Controller confirms that personal data concerning them is being processed.
2. That access to the files is provided within a maximum period of one month from receipt of this request, understanding that if this period elapses without an express response to the aforementioned request for access, it shall be deemed denied. In this case, the appropriate complaint may be filed with the Spanish Data Protection Agency.
3. That this information includes, in a legible and intelligible manner, the data about the person included in the controller's records, such as:
 - a. The purposes of processing.
 - b. The categories of personal data.
 - c. The recipients or categories of recipients to whom the personal data is or will be disclosed.
 - d. The envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period.
 - e. The existence of automated decisions, including profiling.
 - f. Whether personal data has been transferred to a third country or an international organization, or whether it is intended to do so.

At, on of,

Objection

Data Controller details

- **Company name:**
- **Address:**

The user may consult the Data Controller:

- From the Ona Hotels & Apartments group of companies by clicking [here](#).
- Ona Hotels & Apartments as manager by clicking [here](#).

Applicant's details

Mr./Ms., of legal age, with address at Street (C/) no., Town/City Province Postcode with National ID (DNI), a photocopy of which is attached, hereby states their wish to exercise their right to object, in accordance with Article 21 of Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as Article 18 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Grounds for the objection

The applicant objects to the processing of personal data concerning them, contained in the company's processing records and,

Requests:

1. That, within a **maximum period of one month** from receipt of this request, the processing of the above data is objected to.
2. That, if the Data Controller considers that this objection does not apply, it likewise communicates this, stating reasons and within the indicated period, for the purpose of filing the corresponding complaint.

At, on of,

Erasure

Data Controller details

- **Company name:**
- **Address:**

Applicants' details

Mr./Ms., of legal age, with address at Street (C/) no., Town/City Province Postcode with National ID (DNI), a photocopy of which is attached, hereby states their wish to exercise their right to erasure, in accordance with Article 17 of Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as Article 15 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Requests

1. That, within a **maximum period of one month** from receipt of this request, the effective erasure of any data and information relating to the person that is contained in the controller's processing records is carried out, in the terms established in Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as the LOPDGDD, and that written notice is sent to the address indicated above.
2. That, if the data controller considers that such erasure does not apply, it likewise communicates this to the data subject, with reasons and within the indicated period, for the purpose of filing the corresponding complaint.

At, on of,

Restriction of processing

Data Controller details

- **Company name:**
- **Address:**

Applicant's details

Mr./Ms., of legal age, with address at Street (C/) no., Town/City Province Postcode with National ID (DNI), a photocopy of which is attached, hereby states their wish to exercise their right to restriction of processing, in accordance with Article 18 of Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Grounds for restriction

Considering that the following condition is met:

- a) The data subject contests the accuracy of the personal data, for a period enabling the Data Controller to verify the accuracy of the same.*
- b) Processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of its use.*
- c) The Data Controller no longer needs the personal data for the purposes of processing, but the data subject needs it for the establishment, exercise or defense of claims.*
- d) The data subject has objected to processing pursuant to Article 21.1 while it is verified whether the legitimate grounds of the Data Controller override those of the data subject.*

In accordance with Article 18 of the Regulation (EU) and Article 16 of the LOPDGDD, the undersigned

Requests

That the processing of my personal data be restricted, taking into account:

- That processing is unlawful and I object to its erasure
- That the controller no longer needs my personal data for the purposes for which it was collected, but I need it for the establishment, exercise or defense of my claims.

That, within a **maximum period of one month** from receipt of this request, the processing of the personal data concerning me is restricted, under the terms of Regulation (EU) 2016/679 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as the LOPDGDD.

At, on of,

Rectification**Data Controller details**

- **Company name:**
- **Address:**

The user may consult the Data Controller:

Applicants' details

Mr./Ms., of legal age, with address at Street (C/) no., Town/City Province Postcode with National ID (DNI), a photocopy of which is attached, hereby states their wish to exercise the right to rectification, in accordance with Article 16 of Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as Article 14 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Requests

That the rectification of the personal data in respect of which the right is exercised be carried out and that the result of the rectification performed be notified by mail to the address indicated above.

The data to be rectified is as follows:

This request is accompanied by the following supporting documentation proving the inaccuracy or non-compliant nature of the data subject to processing: [.....]

If the rectified data had previously been disclosed, the recipient Data Controller must be notified of the rectification carried out, so that it may also make the appropriate correction.

At, on of,

Portability

Data Controller details

- **Company name:**
- **Address:**

The user may consult the Data Controller:

Applicants' details

Mr./Ms., of legal age, with address at Street (C/) no., Town/City Province Postcode with National ID (DNI), a photocopy of which is attached, hereby states their wish to exercise their right to data portability, in accordance with Article 20 of Regulation (EU) 679/2016 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as Article 17 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).

Grounds for exercising the right to portability

Considering that the following conditions are met:

- a) Processing is based on the data subject's consent [Article 6(1)(a) / Article 9(2)(a)]*
- b) Processing is based on a contract entered into by the parties [Article 6(1)(b)]*
- c) Processing is carried out by automated means*

In accordance with Article 20 of the Regulation (EU) and Article 17 of the Organic Law (LOPDGDD), the undersigned

Requests:

1. That, within a **maximum period of one month** from receipt of this request, the right to portability of the personal data concerning me be exercised, under the terms of Regulation (EU) 2016/679 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as the LOPDGDD.
2. That the corresponding personal data be transmitted directly, in its structured, commonly used and machine-readable format, to

At on of,