

**TERMS OF USE OF THE WEBSITE BY INDIVIDUALS - END USERS, PRIVACY POLICY, COOKIE POLICY AND  
RESERVATION POLICY**

**TERMS OF USE OF THE WEBSITE BY INDIVIDUALS - END USERS**

Date of last update: 01.04.2021

These Terms of access to and use of the website <https://gloriahtl.com/> (the "Terms") are binding on users of the website. Use of the Services available without registration will be deemed to be an expression of consent to these Terms. **"BEST HOTELS MANAGEMENT" Ltd.** in its capacity of personal data controller processes personal data that customers provide when visiting our website <https://gloriahtl.com/> in accordance with the regulations for personal data protection In connection with the provided Services, **BEST HOTELS MANAGEMENT Ltd.** processes personal data in accordance with the Privacy Policy ("Policy"), which you can read here. The policy is an integral part of these Terms.

**1. General information**

1.1. **"BEST HOTELS MANAGEMENT" Ltd.** (<https://gloriahtl.com/> „We“/„Us“) provides to individuals - end users ("You") free information services ("Services"). Services include booking options and hotel accommodation. We are committed to protecting and respecting your privacy. Please read this notice as it contains important information about how we use personal information that we collect from you or that you provide to us when booking through our website.

**Administrator Information:**

**Name:** "BEST HOTELS MANAGEMENT" Ltd.

**UIC:** 206354965

**Headquarters and address of management:** Varna, 26 A Bratya Shkorpil Str., 3rd floor, office 13

**Address for correspondence:** Varna, 26 A Bratya Shkorpil Str., 3rd floor, office 13

**E-mail:** [office@besthotelsmanagement.com](mailto:office@besthotelsmanagement.com)

**Contact phone:** +359882666525

1.2. In order to use the Services, you guarantee that you have reached the age of 18 and are capable of concluding a contract. **BEST HOTELS MANAGEMENT Ltd.** is not responsible in case of use of the Services by a person who does not meet the specified age and legal capacity restrictions.

1.3. You agree to provide accurate, complete and up-to-date information when booking and to maintain it. In case of inaccuracy in the data, you have no right to use the Services until the inaccuracy is removed. You warrant that you are of the full legal age or legally represented, where applicable, fully capable and that the information provided to us is true, accurate, complete and current. For these purposes, the User is responsible for the accuracy of all reported data and will keep the information updated so that the specified data reflects their actual status.

1.4. You warrant that you have informed the third parties on whose behalf you have provided data, where applicable, of the aspects contained in this document. You also ensure that you have received permission from the third party to provide us with their data for the stated purposes. You acknowledge that you are responsible for incorrect or inaccurate information provided through the Website, as well as for damages, direct or indirect, that this may cause to us or third parties.

**2. Electronic statement**

2.1. By clicking the "Book" button and confirming the confirmation email you have received, you make an electronic statement under these Terms and agree to abide by them. Before clicking the "Book" button, you have the opportunity to view and edit the information you provided. You accept that the electronic statements to <https://gloriahtl.com/> and the electronic statements from <https://gloriahtl.com/> to you will be considered signed with a simple electronic signature in accordance with Art. 3 (10) of Regulation (EU) № 910/2014, with equal validity to a hand signature. The authorship of these statements will be established by the order of art. 13, para. 1 in connection with art. 13, para. 4, sentence 2 of the Electronic Document and Electronic Certification Services Act ("EDECSA").

2.2. For the Services that are provided without the need for registration, the consent to these Terms is expressed with the very beginning of the use of the Services.

2.3. In connection with the provided Services, communication between you and <https://gloriahtl.com/> by e-mail is required. According to Art. 5 of EDECSA You agree to be the addressee of electronic statements from <https://gloriahtl.com/> in electronic form.

**3. Use of the Services and Content on the Website**

3.1. You may not use in any way, copy, modify or distribute content that does not belong to you, for purposes other than or incompatible with the use of the Services and the purpose of the Website, without the express prior consent of **"BEST HOTELS MANAGEMENT" Ltd.** and / or the respective third parties.

3.2. You agree not to interfere with the normal operation of the technical or software applications and computer systems of <https://gloriahtl.com/> or of the users of the Website by bad-faith actions.

#### **4. Create and store files and other information**

4.1. You warrant that the content you store or submit through the Website does not violate these Terms or the law. If this is not the case, you are responsible for all damages arising from this for third parties and / or **"BEST HOTELS MANAGEMENT" Ltd.**

4.2 The information you store and / or send through the Website may not contain:

(a) advertising content;

(b) materials that violate or disregard the rights or legitimate interests of third parties, including fundamental human rights, intellectual property rights, etc.;

(c) content that is illegal, discriminatory, obscene, offensive, threatening, defamatory, hateful or indecent in nature, as well as content that could embarrass, damage the reputation, insult a third party or reveal a secret protected by law.

#### **5. Changes**

5.1. **BEST HOTELS MANAGEMENT Ltd.** reserves the right to add new Services, change or remove existing Services without the need for prior notice.

5.2. These Terms may be changed in connection with the development, change, termination or addition of new Services, or legislative changes. When making changes, they will be brought to your knowledge and published here.

#### **6. Others**

6.1. Except for intent or gross negligence, **BEST HOTELS MANAGEMENT Ltd.** is not liable for damages and lost profits resulting from:

(a) use or inability to use the Website and / or the Services;

6.3. In the event that any of the clauses in these Terms proves to be invalid, this will not invalidate other clauses.

6.4. The legislation of the Republic of Bulgaria shall apply to unsettled issues.

### **POLICY FOR PROTECTION OF PERSONAL DATA OF INDIVIDUALS - END USERS OF THE WEBSITE**

**Date of last update: 01.04.2021**

Please read this document carefully. It contains the Privacy Policy for individuals - end users of the website <https://gloriahtl.com/> ("Policy") and is an integral part of the Terms of Use by individuals - end users of the website ("Terms"). Use of the Website will be considered an expression of agreement with this Policy. In the event of a change to the Policy, the changes will be posted here. In order to provide the services ("Services") on the Website <https://gloriahtl.com/> and mobile versions and applications ("Site"), **"BEST HOTELS MANAGEMENT" Ltd.** („<https://gloriahtl.com/>"/ „We“) processes data of individuals (“ Data Subjects ”/“ You ”) in accordance with this Policy. When processing personal data, <https://gloriahtl.com/> complies with all applicable data protection regulations, including, but not limited to, Regulation (EU) 2016/679 (the "Regulation").

According to the Regulation, personal data is any information that concerns you and through which you can be identified. Processing of personal data ("Processing") is any action or set of actions that can be performed on personal data by automatic or other means.

#### **1. Groups of persons for whom data are processed**

In connection with the provided Services <https://gloriahtl.com/> processes information about the following Data Subjects:

(a) natural persons, users of the Website without registration;

(b) natural persons who have made inquiries (including by phone), requests, alerts, complaints or other correspondence to <https://gloriahtl.com/>;

(c) natural persons, information on whom is contained in inquiries (including by phone), requests, alerts, complaints or other correspondence addressed to <https://gloriahtl.com/>.

#### **2. Processed data in connection with the provision of the Services**

2.1. Information you provide

You decide whether and how to use the Services provided through the Website. In the forms through which personal data are entered, we clearly indicate the mandatory or voluntary nature of the provision of data. Entering is only obligatory for such data, without which it is impossible to provide the respective Service or part of it.

## **Storage of your files**

You do not have the ability to store your files. The functionalities provided on the Website are not intended for storage and processing of special categories of data within the meaning of Art. 9 and Art. 10 of the Regulation. You agree not to store or transmit through the Website to third parties, in any form, information containing special categories of data and / or sensitive data (see Special Categories / Sensitive Data).

## **Correspondence, complaints and signals**

In order to resolve submitted complaints, signals, disputes, inquiries, requests or other questions addressed in communication to Us, received through electronic forms on the Website, by calling the contact numbers at <https://gloriahtl.com/>, by sending to regular or e-mail. We store and process this information as well as the result of this processing.

## **Special categories (sensitive) data**

The services of <https://gloriahtl.com/> and the functionalities provided on the Website are not intended for storage and processing of special categories of data within the meaning of Art. 9 and Art. 10 of the Regulation. You agree not to store or send through the Website to third parties, in any form, information containing special categories of data and sensitive data such as:

- data revealing your racial or ethnic origin, political views, religious or philosophical beliefs, membership in trade unions, or your genetic data, biometric data, data on your health, sexual life or sexual orientation, or data related to with your sentences and violations.

- identity documents, as well as PIN, passport / ID card number, etc. similar.

<https://gloriahtl.com/> has no obligation and does not monitor the presence of the data indicated here on the Website.

The provision of such information is entirely at the risk and responsibility of the person providing it.

## **Other data**

<https://gloriahtl.com/> may process other data relating to you in cases where you voluntarily provide such data by filling out appropriate electronic forms on the Website, adding preferences, settings and more.

## **2.2. Data related to the process of using the Services**

### **Logs related to security, technical support, development, etc.**

The Website uses logs for the following purposes:

- To ensure the reliable operation of the Services and to identify technical problems;
- To ensure the security of the Services and to detect malicious actions;
- For development and improvement of the Services on the Website;
- To measure the traffic and usability of the Website;
- Logs in cases where this is required by law (such as logs of electronic declarations of intent).
- Server logs, Web Application Firewalls and other devices falling into this category. These logs are needed to detect technical problems, detect malicious activity and the above purposes. They are stored for up to 1 / one / year. Logs can contain the following information: date and time, IP address, URL, browser and device information. In addition, some devices may use cookie-based security technology.

## **Cookies**

The use of cookies is necessary for the functioning of the Website. Types of cookies we use:

### **Advertising cookies**

These cookies can be set through our website by our advertising partners. They can be used by these companies to profile your interests and display relevant ads on other websites. They do not directly store personal information, but are based on the unique identification of your browser and Internet device. If you do not enable these cookies, you will have less targeted advertising.

### **Effective cookies**

These cookies allow us to count visits and traffic sources so that we can measure and improve the performance of our website. They help us know which pages are the least and most popular and see how visitors move around the website. All information collected by these cookies is aggregated and therefore anonymous. If you do not enable these cookies, we will not know when you visited our website and we will not be able to monitor its effectiveness.

### **General cookies**

These cookies are necessary for the functioning of the website and cannot be excluded in our systems. They are usually set only in response to actions you take that constitute a request for services, such as setting your privacy preferences, logging in, or filling out forms. You can set your browser to block it or warn you about these cookies, but then some parts of the website will not work. These cookies do not store personally identifiable information.

### **Third party cookies**

We also use certain third-party cookies as part of our services. These cookies are managed by the respective websites and are not controlled by us. We may also use certain authorized third parties to place cookies during your visits to our websites for the purposes of the services they provide to us. The exclusion of cookies by third parties is done using the general settings of your browser or the instructions provided by the relevant third party websites. They all use different cookies.

### **Cookie settings**

You can adjust the settings for the cookies you receive from our website in the browser you use. Please note that if you restrict certain types of cookies, our website may not work completely correctly and you may not be able to use its full functionality.

### **Purposes of personal data processing**

<https://gloriahtl.com/> collects, uses and processes the information described above for the purposes set out in this Policy and in the Terms of Use of the Services, which may be:

- Purposes necessary for the conclusion and implementation of a contract for the provision of the Services between you and <https://gloriahtl.com/>;
- Purposes necessary for the protection and implementation of the legitimate interests of <https://gloriahtl.com/> ;
- Purposes for which you have given your explicit consent;
- Purposes necessary for the fulfillment of legal obligations of <https://gloriahtl.com/>.

### **Conclusion and execution of a contract**

These are the purposes necessary for the steps of concluding and implementing a contract between you and <https://gloriahtl.com/>, including the necessary data processing in the activities for providing the Services available through the Website. In addition, these purposes include the communication with you, including by e-mail, required in connection with the provision of the Services and / or notifying you of changes in the provided Services. This may require the processing of part or all of the above categories of data.

### **Legitimate interest**

These are purposes related to the legitimate interests of <https://gloriahtl.com/>. These purposes include:

Ensuring the normal functioning and use of the Website by you and other users, maintenance and administration of the Services, resolving disputes, detection and prevention of malicious actions.

Detection and resolution of technical or problems with the functionality, development and improvement of the Services. Communicating with you, including electronically on important issues related to the Services.

Reception and processing of received signals, complaints, requests and other correspondence;

Exercising and protecting the rights and legitimate interests of <https://gloriahtl.com/>, including in court, and assisting in the exercise and protection of the rights and legitimate interests of other users of the website and / or affected third parties.

For these purposes, it may be necessary to process some or all of the above categories.

### **Legal obligations**

The purposes related to the observance of legal obligations of <https://gloriahotelbg.com>, include fulfillment of the obligations provided by law for preservation or provision of information upon receipt of a relevant order by competent state or judicial authorities, while ensuring the possibility for carrying out the control powers of the competent state authorities, while fulfilling the legal obligations of <https://gloriahtl.com/> to notify you of various circumstances related to your rights, the Services provided or the protection of your data, etc. For these purposes, it may be necessary to process part or all of the above categories.

### **Explicit consent**

Your data may be processed on the basis of your explicit consent, the processing in this case being specific and to the extent and scope provided for in the respective consent.

## **4. Period of storage**

Here you can find information about the period of storage of different types of data. When storing data, we apply the general principle of data storage in a minimum volume and for a period not longer than necessary to provide the Services, ensure their security and reliability and the requirements of the law.

Data types	Period of storing	Explanations
System logs (may contain information such as: date and time, IP address, URL, browser version and device information)	For a period of up to 1 /one/ year	<i>Server logs, Web Application Firewalls, and other devices in this category. These logs are needed to identify technical problems and / or detect malicious activity.</i>
Correspondence, complaints and alerts, requests, incoming phone calls	Correspondence, complaints and alerts are stored for up to 5 /five/ years. In order to ensure the reliability of the service, incoming telephone calls are stored for up to 3 /three/ months	<i>In order to resolve submitted complaints, alerts, disputes, inquiries, requests or other questions addressed in communication to Us, received through electronic forms on the Website, through calls to the telephone exchange at <a href="https://gloriahtl.com/">https://gloriahtl.com/</a>, by sending a regular or email. We store and process this information as well as the result of this processing. Given the statute of limitations under Bulgarian law in order to resolve disputes, this information is stored for up to 5 / five / years.</i>
Cookies	Up to 6 /six/ months from the last use of the Services	For a description of the cookies used, see the "Cookie Policy"

In the event of a legal dispute or proceedings requiring the retention of data and / or a request from a competent state authority, it is possible to retain data for longer than the specified periods until the final conclusion of the dispute or proceedings before all instances. The specified deadlines may be changed in case a different requirement for keeping the information is established according to the current legislation.

Backup. In order to ensure the reliability of the Services and to prevent data loss for technical reasons, the Website applies a data reservation policy. The maximum update period (including data deletion) of all backups is 30 days.

## 5. Provision of information

<https://gloriahtl.com/> does not provide your personal data to third parties in any other way except in the cases described in this Policy, the Terms and the cases provided by law.

### 5.1. Suppliers and subcontractors

<https://gloriahtl.com/> uses subcontractors and service providers such as specialized data centers for reliable and secure colocation of server and network equipment, etc. When working with subcontractors and suppliers, <https://gloriahtl.com/> requires them to strictly follow our instructions, in accordance with these Terms and Conditions.

### 5.2. Third parties

Your personal data may be disclosed to third parties only in the following cases: when this is provided by law; if duly requested by a competent state or judicial authority; when we have received your explicit consent to this; when this is necessary for the protection of the rights and legitimate interests of <https://gloriahtl.com/> and/or other users of the Services.

### 5.3. Change of ownership

In the event of a merger, acquisition or sale of assets affecting the processing of personal data, you will be notified in advance.

## 6. Rights with regard to personal data

The regulation provides for the following rights:

### 6.1. Right to information.

This Policy is intended to inform you in detail about the processing of your personal data in connection with the Services provided.

### 6.2. Right of access.

You have the right to receive confirmation whether your personal data is processed, access to them and information about their processing and your rights in this regard.

You can access this at any time through the features provided in your account.

### 6.3. Right to rectification.

You have the right to correct your personal data in case it is incomplete or inaccurate. You have the opportunity to correct your data at any time through your account.

### 6.4. Right to erasure.

You have the right to request the deletion of data, except in cases where there is a substantial basis and / or legal obligation for its processing.

Due to the fact that the information sent by you is an electronic statement sent by you, according to EDECSA we have the obligation to maintain a log of sending the statement (without its content) for a period of 1 / one / year. The log contains the date of the statement, the name and email address of the sender, and the identification of the recipient.

The data shall be deleted after the expiry of the specified period. In the meantime, it may be provided only in due course to the competent state authorities in the exercise of their supervisory powers or to a competent court in the event of legal proceedings in which they are relevant. In the event of a legal dispute or proceedings requiring the retention of data and / or a request from a competent state authority, it is possible to retain data for longer than the specified periods until the final conclusion of the dispute or proceedings before all instances.

In order to ensure the reliability of the services and prevent data loss for technical reasons, the Website applies a data reservation policy. The maximum period for updating (deleting data) from all backups is 30 days.

6.5. Right of restriction in relation to data processing. The regulation provides for the possibility to restrict the processing of your personal data if there are grounds for doing so.

6.6. Right to notify third parties. If applicable, you have the right to ask the controller of your personal data to notify third parties when he/she has provided your data, regarding the correction, deletion or restriction of the processing of your personal data.

It is important to keep in mind that <https://gloriahtl.com/> as a Personal Data controller is not an intermediary in the relationship between you and third parties.

6.7. Right to data portability. You have the right to receive the personal data that you have provided and that relate to you in a structured, popular machine-readable format, as well as to use this data for another administrator at your discretion.

6.8. The right not to be the subject of a decision based solely on automated processing, including profiling which has legal consequences for you or similarly affects you to a significant extent, unless the grounds for the protection of personal data provided for in the applicable legislation on this are met and appropriate guarantees are provided for the protection of your rights, freedoms and legitimate interests.

When providing the Services on the Website, technologies falling into this category are not used.

6.9. Right of withdrawal of consent. You have the right, at any time, to withdraw your consent to the processing of personal data, which is based on your consent. Such withdrawal shall not affect the lawfulness of the processing on the basis of the consent given until the moment of its withdrawal.

For services, such as subscription to e-mail notifications, the subscription for which is based on your wish (consent), there is a possibility to terminate the subscription at any time (withdrawal of consent).

6.10. Right to object. You have the right to object to data processed on the basis of a legitimate interest.

In the event of such an objection, we will consider your request and, if justified, will comply with it. If we believe that there are compelling legal grounds for processing or that it is necessary to establish, exercise or defend legal claims, we will inform you.

6.11. Right to appeal to a supervisory authority. You have the right to lodge a complaint with a supervisory authority if you believe that the processing of personal data concerning you violates the applicable legislation on personal data protection. The supervisory body in the Republic of Bulgaria is the Commission for Personal Data Protection, with address: Sofia 1592, Blvd. "Prof. Tsvetan Lazarov" № 2.

## 7. Accuracy of information

<https://gloriahtl.com/> is not responsible for the accuracy of the data provided by you, does not carry out checks in this regard and does not guarantee the actual identity of the individuals who provided the data. In all cases of suspicion on your part, of established fraud and / or abuse, please notify us immediately. You undertake not to violate the rights of others in connection with the protection of their personal data or other rights when providing any information on the Website.

## 8. Data protection officer

Questions and requests related to the exercise of the rights to the protection of your personal data can be addressed to the Data Protection Officer at <https://gloriahtl.com/>:

**Correspondence address: 9000 Varna, 26A Bratya Shkorpil Str., 3rd floor, office 13**

**E-mail: [office@besthotelsmanagement.com](mailto:office@besthotelsmanagement.com)**

## POLICY FOR USE OF COOKIES

**Important: The policy enters into force on 01.04. 2021.**

Here you can get acquainted with the used cookies and other technologies for storing information in connection with the provided services ("Services") at <https://gloriahtl.com/>.

Cookies are information stored in your browser. They are used to store settings and identifiers required for some of the services provided on the Website.

<https://gloriahtl.com/> implements a strict policy in accordance with the new EU requirements.

Cookies are used for the following purposes:

Type	Period of storage	Description
Session and navigation management (session identifier, security protection, previous step for the "back" button, etc.)	Temporary (during your stay on the Website)	<i>These cookies are technically necessary for login, navigation management and use of the Website. The Website cannot function reliably and normally without them.</i>
Settings (language of the Website, choice to use mobile or desktop version, hiding information boxes)	Up to 6 /six/ months from the last use	<i>These are cookies that are used to save your settings; which allow you to hide information boxes that you have already seen and others.</i>

**Delete cookies from your browser (This option is available from May 25, 2018)**

<https://gloriahtl.com/> provides special functionality that allows you to delete all cookies from <https://gloriahtl.com/>. If you wish to do so, use this link: [aboutcookies.org](http://aboutcookies.org).

### Cookie control in the browser

If you wish, you can also use your browser settings to delete and / or disable the receipt of cookies from a particular or all websites. You can learn more about this at [aboutcookies.org](http://aboutcookies.org).

## RESERVATION PRIVACY POLICY

*Last updated: April 1, 2021*

### Information and consent

This Privacy Policy describes how we collect, use, process and disclose your information, including personal information about you (the "User"), along with accessing and using our booking system. By reading this Privacy Policy, the user is informed about how we collect, process and protect personal data provided through the reservation mechanism. By accessing the platform or providing information, you agree to our privacy practices set forth in this Policy. We may change this notice from time to time. You should check this notice frequently to make sure you are familiar with the latest version.

**BEST HOTELS MANAGEMENT Ltd.** operates this reservation system through Data Processor as explained below. For the purposes of the General Data Protection Regulation (GDPR) (EU) 2016/679, we are the data controller. There is a strict contractual framework for the protection of your personal information between the data controller and the personal data processor-certified service provider PCI-DSS Level 2, audited monthly by [Trustwave](https://www.trustwave.com).

### Mandatory nature of data provision

The information required in the forms available from the reservation mechanism is generally mandatory (unless otherwise specified in the mandatory field) in order to meet the stated objectives. Accordingly, if they are not provided or are not provided properly, we will not be able to process the request.

### Personal data that we collect and process when booking

**This will include:**

- personal information about you that we ask of you (eg your name, address and email address) when making a reservation through our booking mechanism;
- financial details to process your reservation when we require prepayment;
- details of the transactions you make through our booking mechanism and details of the execution of your orders;
- our Data Processor may collect and process personal data collected and / or processed on our behalf in accordance with our instructions. The processor may not process it in any other way or for any other purpose.

**When booking, we give permission to our data processor:**

- to use your personal information to book rooms and / or other services for you in **our hotels**;
- to transfer the financial data to **BEST HOTELS MANAGEMENT Ltd.** and / or an appropriate third party (eg a credit card company) for the purpose of confirming or paying a reservation;
- to use your information for marketing purposes (when you explicitly agree to this); and
- to fill in forms and other details on our website in advance in order to facilitate your next visit to our booking mechanism (for example, when changing or canceling a reservation).

In case of registration and/or access through a third party account, we may collect and access certain information from the user profile of the user from the respective social network, only for internal administrative purposes and/or for the purposes specified above.

**Third party data**

In the event that the User provides data to third parties, he/she declares that he has the consent of the third party and undertakes to provide the interested party - the data owner, the information contained in this Policy, properly releasing us and our data processor from any responsibility in this regard. However, we may carry out the necessary checks to verify this fact by taking appropriate due diligence measures, in accordance with data protection provisions.

**Sensitive data**

Unless expressly required, please do not send or disclose to us, in or through the Services or otherwise, any sensitive personal data (eg social security numbers, national identification number, data relating to racial or ethnic origin, political opinion, religion, ideological or other beliefs, health, biometric or genetic characteristics, criminal origin, trade union membership or administrative or criminal proceedings and sanctions).

**Use of services by minors**

The Services are not intended for persons under the age of 16 and we want them not to provide Personal Data through the Services.

**Purpose of personal data processing**

Depending on the requests of the User, the collected personal data will be processed in accordance with the following purposes:

- To manage the reservations made, including the management of payments (where applicable) and the management of user requests and preferences;
- To manage registration in loyalty or membership programs, as well as to receive and redeem points where applicable;
- To manage the requests for contact of the User with us through the channels provided for this purpose.
- To manage the sending of personalized commercial messages by us, by electronic and / or conventional means, in cases where the User expressly consents.
- To manage the provision of the agreed accommodation service, as well as additional services.
- To manage research and / or evaluations on the quality of the services we provide and / or the perception of its image as a company.

**Data retention**

We will retain your Personal Data for the period necessary to achieve the purposes set out in this Policy, unless a longer retention period is required or permitted by law or if the User requests their erasure from us, objects or revokes their consent.

The criteria used to determine our detention periods include:

- The time in which we maintain a permanent relationship with you and provide you with the Services (for example, while you have a reservation that has not yet been made)
- Is there a legal obligation to which we are subject (for example, some laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable in view of our legal situation (such as limitation, litigation or regulatory investigations)

### **Legitimate interest in processing your data**

The processing of the data necessary for the fulfillment of the above-mentioned purposes in this Policy, which require the consent of the User, cannot be performed without the mentioned consent. Similarly, in the event that the User withdraws their consent to any of the processing, this will not affect the legality of the processing performed earlier. To withdraw such consent, the User may contact us through appropriate channels. Similarly, in cases where it is necessary to process the User's data to fulfill a legal obligation or to fulfill the existing contractual relationship between us and the User, the processing would be legitimate, as it is necessary to comply with these objectives.

### **Data disclosure**

We will use and disclose Personal Data in the event that we need:

- to comply with applicable law, including laws outside your country of residence;
- to comply with the legal process;
- in response to requests from public and state authorities, including authorities outside your country of residence, and in response to national security or law enforcement requirements;
- to apply our terms and conditions;
- to protect our operations;
- to protect the rights, private liberty, safety or property of ourselves, you or others; and
- in protecting or limiting the damage we may suffer.

We may use and disclose Other Data for any purpose except when restricted by applicable law. In some cases, we may combine other data with personal information (such as combining your name with your location). If we do, we will treat the combined data as Personal Data, as long as they are combined.

### **International transfers of personal data**

We may transfer your personal information to our non-EEA-based data processor and / or subprocessor (s) for the purposes described in this notice. If we do so, your personal information will continue to be subject to one or more of the appropriate safeguards set out in law. This could be the use of model contracts in a form approved by regulators, or by getting our suppliers to register in an independent privacy scheme approved by regulators (such as the US Privacy Shield scheme). Our data is stored in the cloud using [Amazon Web Services](#) in Northern Virginia, USA and Frankfurt, Germany. If you have access to any of our systems outside of the United States, you acknowledge that your personal information may be transferred to the United States, a jurisdiction that may have different data privacy and security protections from those of your jurisdiction, to be processed and stored.

### **Security measures**

We will process the User's data at any time in an absolutely confidential manner and while maintaining the obligation to protect this data, in accordance with the provisions set out in the applicable provisions, and to this end, we take the technical and organizational measures necessary to ensure the security of the data and to prevent its alteration, loss, processing or illegal access, depending on the state of the technology, the nature of the stored data and the risks to which it is exposed.