



PIVACY POLICY

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SINERGIA DE ACTIVOS Y SOCIOS SL, registered in the R.M. of MALAGA and domiciled in Pol. Ind. La Moraga 2B of Alhaurin de la Torre - Malaga (hereinafter, XSINERGIA) we understand that the highest quality standards that we demand in all aspects of our products and services must undoubtedly be applied to the protection of our clients' privacy.

Therefore, XSINERGIA guarantees you that it is your will, not only to strictly comply with the requirements of the applicable regulations (among others, Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the Protection of natural persons with regard to the processing of personal data and the free circulation of these data and repealing Directive 95/46 / EC (General Data Protection Regulation or RGPD)) requires the treatment of your data. personal data, but go beyond and ensure and protect your privacy to the extent possible.

In this document, you will find all the necessary information to understand how we manage and ensure your privacy.

Ambit

As you know, XSINERGIA offers all kinds of services through its website. But that is not the only tool to relate to you. In addition to the information and the offer of the web, XSINERGIA uses other means to be close to you and offer you in a comfortable way all the information that you demand from us. Therefore, we point out that this Privacy Policy is extendable to the other communication bridges, different from our website, that we tend to you: social networks, newsletters, e-mails, SMS, mobile application, and other existing means of communication.

When living in a changing world like the current one, we recommend visiting this Privacy Policy from time to time to verify if there is any modification and, at least, every time you book with us.

Purposes

Depending on the relationship you decide to have with us your data will serve the following purposes:

1º) Reservations at Xsinergia Travel: we use your personal data to manage your online reservation, including the referral of the same to the providers, as well as to our customer service.

2nd) Improvement of our services: in order to keep your opinion very much in mind, XSINERGIA may use your information to request your opinion about your experience in any of the services you have booked with us at Xsinergia Travel. To protect your privacy, the specific details that you share with us, unless otherwise indicated by you, will not be transferred to the providers.

Likewise, we can use your data for analytical purposes to improve our services, as well as our online platforms.

3rd) Account administration: We offer the possibility of having a user account on our website. We use the information you provide us to manage the account, fill your invoices faster, enjoy special offers, book more easily and manage your personal settings, which allows you to create and share lists, as well as your history, and see another type of information you have provided.

4th) Marketing: In addition to the marketing actions carried out through cookies (you can access our Cookies Policy), we use your data to send you newsletters adapted to your tastes, presenting content adapted to your interests including segmented advertising (ads in third-party websites based on your preferences and interests), as well as, in an aggregate way, conduct market research.

5th) Market research: Sometimes we can invite you to participate in some type of market research. Of course, we will not use your personal data without your consent that we can not add and "anonymize".

6º) Detection and prevention of fraud: To the extent that the Law and good faith require us, we may use personal information to detect and prevent fraudulent, illegal or unwanted actions.

7th) Advertising content: When you access a website or application that contains advertising spaces that broadcast one or more of our ads, it is likely that this ad contains one of our cookies. With your prior permission, it is likely that this cookie is registered in the terminal, and thanks to that, allows us to recognize the browser of your terminal during the validity period of the cookie in question. From XSINERGIA we integrate cookies in our advertisements that are disseminated by third parties, and that result from the parameters of the browser software that you used when entering or visiting our official website. With the navigation on our

website you have authorized that cookies may be registered in it, these cookies will allow us depending on the configuration selected by the client:

- Count the number of views and activations of our advertising content disseminated through third-party web sites and applications.
- Identify those contents in web sites and applications.
- Determine the number of users who have clicked on each content.
- Calculate the amounts owed to each of the parties involved in the advertising distribution chain (advertising agency, marketing department, dissemination website) and establish the relevant statistics in this way.
- Adapt the presentation of the website to which it carries one of our advertising contents, according to the preferences of your terminal's display (language used, screen resolution, operating system, etc.) when you visit our website and according to the hardware and visualization or reading programs that your terminal uses; depending on the location data (longitude and latitude) that are transmitted to us by your terminal with prior consent; as well as follow the future exploration carried out by your terminal in other web sites and applications or other advertising content.

Without belittling that we can keep your personal data properly protected to facilitate attention to legal actions designed to demand different types of responsibilities during their respective limitation periods, your data will be kept for five (5) years

Legitimation

The most common legal bases for processing your data are your own consent (for example to receive our newsletter) or the contractual execution of the product or service you have agreed with us.

Due to legal obligation, the different States with which your relationship with XSINERGIA has some kind of connection may require us to process the data in a certain way (for example, in tax or border matters).

Notwithstanding the above, there may be situations in which, exceptionally, the legal basis for the treatment is the legitimate interest. Although we can not renounce it, we assure you that its use will be restricted and following the best practices in its use.

We must inform you that it is possible that your opposition to certain treatments may lead to the non-provision or execution of services or products contracted, so we decline any type of liability arising from such situations.

Recipients

Based on the legitimacy of the consent and / or the execution of the contract, your data may be transferred both to companies that provide contracted services located outside the European Economic Area and due to legal obligations to public administrations of different States.

Also, being a company with international presence, we inform you that it is possible that your data may be sent to external collaborators of XSINERGIA in which we have placed our trust to manage certain issues (for example, management of reservations and payments, shipments and negotiations administrative of different types, etc.). In this sense, from XSINERGIA we assure you that they are subject to contracts and confidentiality clauses according to the legally established requirements.

In the same way we inform you that these service providers can be located outside the European Economic Area. If you want to know the guarantees established for this international treatment of your data, you can contact us at info@xsinergia.com

If XSINERGIA carries out or participates in a merger, acquisition, reorganization, sale of assets or in a bankruptcy or bankruptcy proceeding, we may sell, transfer or share all or part of our assets, including your personal data. In any case, we would inform you beforehand of this fact and we would inform you of the new applicable privacy policies.

How does XSINERGIA use social networks?

We only use the Facebook plug-in to encourage you to follow our site. The other possibilities for sharing information with social networks are made through simple direct links without plug-in technology.

Except in the specific cases in which you are asked for informed consent for the processing of your data, no other use of data is done through social networks.

How does XSINERGIA use customer feedback and the information you share with us about the destinations at Xsinergia Travel?

After having enjoyed the services, you may want to share your impressions with XSINERGIA or with other travelers. XSINERGIA encourages you to do so, since it is the best instrument to continuously improve our services.

Although we do not send you a questionnaire about it, you can leave your opinions in our forums, where you can access both XSINERGIA TRAVEL and other travelers.

As a logical consequence of sending comments to public access forums, you accept that all the content of them (including your user identification if you have made the comment in this way), can be published in the various forums that make up the XSINERGIA community, both on our website, as social networks or mobile applications. Likewise, you accept and consent that XSINERGIA may use them (totally or partially) according to our criteria for marketing campaigns, communication or improvement of our services, in any of the XSINERGIA channels as well as in social platforms, newsletters or communications.

Security

In addition to our complete adaptation to the requirements that data protection legislation obliges us based on the type of data processed, we always use the most modern security, encryption and access control systems to prevent unauthorized access and / or improper use of personal information. In this way, we ensure that access to your data can only be done by authorized personnel and for the functions that have been properly assigned.

Rights

In addition to the already advised review of this Privacy Policy, you can exercise your rights of portability, access, rectification, limitation, deletion, opposition to treatment and / or withdrawal of your consent by sending us a communication in that sense - attaching a copy of your ID - either to the XSINERGIA address, or by sending an e-mail to info@xsinergia.com

We inform you that any exercise of the above data rights of a personal nature will be carried out with the limitations imposed by the Law with respect to legitimate rights and legal requirements (fiscal, administrative, etc.). In any case, the opposition to the treatment or deletion of data does not imply its immediate elimination, but, following the Law, the data will be archived for a limited time, with restricted access available to administrative and judicial authorities.

In any case, we remind you of the right regarding this Privacy Policy that assists you in making a claim to the Data Protection Agency that corresponds to you.

Origin and type of data

There are two ways to enjoy our services: through a previous registration in XSINERGIA and without previous registration in XSINERGIA.

Making your reservation without a previous registration in XSINERGIA, you will provide us with the basic data required for the contracted service, such as your name, surname, email, nationality, data on the passport or identity document, telephone number, and some other information necessary for the provision of the service requested by the provider. This data will be stored or stored as indicated in the current Privacy Policy.

It is important that you know that we will only ask you for the data that is necessary to be able to provide you with the service you have requested.

Yes, as we expect, your relationship with XSINERGIA will be prolonged, undoubtedly the best way to link with us is to create a user account. Through your personal configuration you can select the optional data that you want to share in your profile in addition to the key or mandatory data (such as name or email) and you can offer us other optional information that can speed up your booking processes and help us make you arrive the information that best suits your interests.

When you use our website and, in particular, when you use our mobile applications, we can receive, store and process different categories of data about your location, including general data (such as IP address and zip code) and more specific data (such as GPS functionality used to access the web). Whenever the device allows it, you can deactivate the GPS function and other geographic location functions and prevent your terminal from providing this type of data.

Some information (such as IP address, date and time of access, hardware and software you use, reference and exit pages, web browsing, number of clicks made, pages visited, the order of the visit and the time spent) can be registered automatically by our servers every time you access our website or browse it. Likewise, we inform you that in XSINERGIA we use cookies to improve your browsing and to be able to offer you the products and services that could best adapt to your wishes. In this regard, we inform you that we can also receive information about you when you use certain social networking services.

However, we may treat data, always linked to your relationship with us by third parties (for example, service providers).

Minors

Our services are aimed at people over 18 years of age or minors with legal capacity to contract. Only non-emancipated minors who can demonstrate express and specific consent of their parent and / or guardian may use our services. Otherwise, we reserve the right to delete all information, as well as cancel the accounts themselves.

Links to other websites

XSINERGIA offers links to other websites for your benefit and information. We cannot be responsible for the content that is provided in other independent sites and, most especially, we cannot control or assume any responsibility for the privacy policies of third-party sites. The websites of third parties that are accessed through links on our website have their own privacy policies, so we recommend that you read and analyze them beforehand.

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