

Privacy policy

SUNBORN (GIBRALTAR) RESORT LTD is aware of the importance of personal data privacy and therefore has implemented a data-processing policy which is designed to provide maximum security in its use and collection, guaranteeing compliance with the current regulation on the matter and configuring this policy as one of the basic pillars in the entity's lines of action.

During browsing on the website **WWW.SUNBORNGIBALTAR.COM**, it is possible that personal data is requested through different forms designed for this purpose. These forms will be part of the relevant data processing according to the particular and specific purpose which motivates its collection.

Below is a list of the data-processing procedures which may be carried out on the website:

I. Identification of the party responsible for data processing.

All data processing is carried out on on behalf of SUNBORN (GIBRALTAR) RESORT LTD., whose identifying details are:

Information on the responsible party for data processing	
Processing responsible party	SUNBORN (GIBRALTAR) RESORT LTD.
Address	OCEAN VILLAGE PROMENADE
Email	PRIVACY@SUNBORNGIBALTAR.COM
Phone	+350 200 16 000
Data protection contact	CONTACTPRIVACY@SUNBORNGIBALTAR.COM
Information on exercise of rights	You can access, rectify and delete the data, as well as revoke the authorisation to process it, and exercise your rights to limitation, portability and for it not to be subject to automated decisions by notifying us in writing to the address stated above or via email at CONTACTPRIVACY@SUNBORNGIBALTAR.COM.

1. Website contact forms

Summary: the entity will process your data to send a reply to your requests or comments.

I. Purpose and legal basis for data processing

A. **Data subject to processing:**

We will process the data you have provided on the website's contact form or, where applicable, through an electronic message, such as an email or instant messaging.

B. **Processing purpose:** Our website has contact forms on different pages. The purpose of the data processing is to manage the communications which may be established with website users who send messages through these forms. The data will not be used for a different purpose.

C. **Automated decisions:** There is no profile segmentation and no automated decisions are made.

D. **How long will we keep your data for?**

- a. The data will be processed during the period of time needed to respond to your request or comment.
- b. Subsequently, the data will be deleted if there is no new conversation or interaction between the parties after one year.

E. **Legal basis for processing:**

The legal basis for the processing of your data is the unequivocal consent you gave by accepting the privacy policy.

F. **Obligation to provide data and consequences of not doing so:**

Providing the requested data is mandatory, otherwise we will not be able to contact you in order to manage your request or comment.

G. **Data origin:** The interested party.

II. To whom will your data be transferred to?

- a. There will be no data transfers.
- b. There will be no international data transfers.

2. CV reception

Summary: the entity will process your data to manage your participation in staff-selection procedures.

I. Purpose and legal basis for data processing

A. **Data subject to processing:**

We will process the data you have provided on the website's contact form or, where applicable, through an electronic message, such as an email or instant messaging.

B. **Processing purpose:** Our website has contact forms on different pages. The purpose of the data processing is to manage the communications which may be established with website users who send messages through these forms. The data will not be used for a different purpose.

C. **Automated decisions:** There is no profile segmentation and no automated decisions are made.

D. **How long will we keep your data for?**

- a. The data will be processed during the period of time needed to manage your request or comment.
- b. Subsequently, the data will be deleted if there is no new conversation or interaction between the parties after one year.

E. **Legal basis for processing:**

The legal basis for the processing of your data is the unequivocal consent you gave by accepting the privacy policy.

F. **Obligation to provide data and consequences of not doing so:**

Providing the requested data is mandatory, otherwise we will not be able to include you in the staff-selection procedures.

G. **Data origin:** The interested party.

II. To whom will your data be transferred to?

- c. There will be no data transfers.
- d. There will be no international data transfers.

3. Newsletter subscription

Summary: the entity will process your data to manage your subscription to its newsletter.

I. Purpose and legal basis for data processing

- A. **Data subject to processing:**
 - a. We will process the data you have provided us with through the register form.
 - b. At SUNBORN (GIBRALTAR) RESORT LTD we use cookies and similar devices in our newsletters, through which we can personalise the content of our advertising emails in order to adapt it to those products and services with which you preferentially interact.
- B. **Processing purpose:** The data you provide us with will be processed with the purpose of managing your subscription to the newsletter of SUNBORN (GIBRALTAR) RESORT LTD, through which you will receive information on the latest news, products and services related to the hotel and restaurant industries.
- C. **Automated decisions:**

There is no profile segmentation and no automated decisions are made.
- D. **How long will we keep your data for?**
 - a. The data will be processed until you revoke your consent for its processing.
- E. **Legal basis for processing:**
 - a. The legal basis for the processing of your data is the unequivocal consent you gave by accepting the privacy policy on the newsletter subscription form.
- F. **Obligation to provide data and consequences of not doing so:**

Providing the requested data is mandatory, otherwise we will not be able to contact you in order to manage your request or comment.
- G. **Data origin:** The interested party.

II. To whom will your data be transferred to?

- e. There will be no data transfers.
- f. There will be no international data transfers.

4. Electronic communications

Summary: if you contact us through an electronic message, such as an email, you will see that in the email signature there is an informative statement on the purpose of your data processing. In this clause we inform you of the remaining points which the data protection regulation requires.

I. Purpose and legal basis for data processing

- A. **Data subject to processing:** We will process the data you have provided us with through the electronic communications you have entered with WWW.SUNBORNGIBALTAR.COM, such as emails.
- B. **Processing purpose:** The purpose of the processing is to manage the communications sent between the parties.
- C. **Automated decisions:** There is no profile segmentation and no automated decisions are made.
- D. **How long will we keep your data for?**
The data will be processed for the period of time during which responsibilities between the parties may arise, with a minimum of 5 years.
- E. **Legal basis for processing:** Processing legitimation is based on the consent given.
- F. **Obligation to provide data and consequences of not doing so:** The data requested is voluntary, since it is information that the parties provide voluntarily during their communication exchange.
- G. **Data origin:** The interested party.

II. To whom will your data be transferred to?

- g. There will be no data transfers.
- h. There will be no international data transfers.

5. Hotel room bookings

Summary: the entity will process your data to manage your room booking at the hotel.

I. Purpose and legal basis for data processing

- A. **Data subject to processing:**
We will process the data you have provided us with through the register form.
- B. **Processing purpose:** If you book a room in our hotel through the booking engine, your data will be processed to facilitate the aforementioned booking process.
- C. **Automated decisions:**
There is no profile segmentation and no automated decisions are made.
- D. **How long will we keep your data for?**
 - a. The data will be processed for the period of time during which responsibilities between the parties may arise, with a minimum of 5 years.
- E. **Legal basis for processing:**
 - a. Legitimation of the processing for the booking is based on the execution of a contract between the parties.
- F. **Obligation to provide data and consequences of not doing so:**
The requested data is mandatory, otherwise the booking process cannot be finalised.
- G. **Data origin:** The interested party.

II. To whom will your data be transferred to?

- i. There will be no data transfers.
- j. There will be no international data transfers.

6. Quotation request for room rental

Summary: the entity will process your data to manage the requested quotation.

I. Purpose and legal basis for data processing

- H. **Data subject to processing:**
We will process the data you have provided us with through the register form.
- I. **Processing purpose:** If you book a room in our hotel through the booking engine, your data will be processed to facilitate the aforementioned booking process.
- J. **Automated decisions:**
There is no profile segmentation and no automated decisions are made.
- K. **How long will we keep your data for?**
 - a. The data will be processed for the period of time during which responsibilities between the parties may arise, with a minimum of 5 years.
- L. **Legal basis for processing:**
 - a. Legitimation of the processing for the booking is based on the execution of a contract between the parties.
- M. **Obligation to provide data and consequences of not doing so:**
The requested data is mandatory, otherwise the booking process cannot be finalised.
- N. **Data origin:** The interested party.

II. To whom will your data be transferred to?

- k. There will be no data transfers.
- l. There will be no international data transfers.

III. Exercise of rights:

You have a right to obtain confirmation on whether we are processing personal data relevant to you or not. As an interested party, you have a right to access your personal data as well as to request the rectification of inaccurate data or, where applicable, its deletion when, among other reasons, the data is no longer necessary for the purposes it was collected. In specific circumstances, you can request the limitation of your data processing, in which case we will only keep it for the exercise or defence of legal claims. In certain circumstances and for reasons related to your particular situation, you can oppose to the processing of your data. We shall then stop processing your data except for urgent legal reasons or for the exercise or defence of potential legal claims.

You can revoke the consent given to us to process your data at any time.

When legally possible, you will have the right to the portability of your data, which implies that you have a right to receive the personal data related to you that we are processing and store it on a private device. This right also allows you to request us to communicate your data to another party responsible for data processing.

Furthermore, if you consider that there is a problem or an incident related to data processing, you can contact the entity via the contact details stated herein and, in any case, you have the right to present a legal complaint before the Data Protection Supervisory Authority, which in this case is the Spanish Data Protection Agency.

To exercise your rights, please send us a request to CONTACTPRIVACY@SUNBORNGIBALTAR.COM, attaching a photocopy of your ID card or any other legal identification document.