

PRIVACY POLICY

I.- Who is responsible for handling your personal data?

Avoris Retail Division, S.L. is responsible for handling your personal data. It has its registered office in C/ José Rover Motta, 27, 07006, Palma de Mallorca. If you have any questions or queries relating to data protection, then please send an email to the Ávoris Data Protection Office: email: dpo@avoristravel.com

II.- What purpose do we use your personal data for?

Avoris Retail Division, S.L. informs the user, or the user's legal representative, that it may provide your personal information through this webpage or for the acquisition of some of its products and/or services, and that your personal data will be managed by Avoris Retail Division, S.L., for the following purposes:

1. **Contact in order to resolve enquiries.** Avoris Retail Division, S.L. will deal with the user's personal data in order to be able to respond to the queries that are received through the contact form and/or get in touch with any users that have requested that they be contacted when completing the contact form.

Legitimization: This is based on consent being granted by the user when inputting their data in the contact form to be contacted by Avoris Retail Division, S.L to solve the enquiry that has been raised.

2. **Management of the reservations of the requested services:** In order to manage the provision of the services offered by Avoris Retail Division, S.L. through this webpage, Avoris Retail Division, S.L. must deal with the client's personal data, as well as the personal data of those under the client's responsibility and any data provided through the current webpage. Also for the previous purposes, Avoris Retail Division, S.L. must pass this information onto the collaborating entities so they can provide these services. The data that such entities will be provided with will be the essential information needed in order to be able to carry out these services and the information will be used for that purpose only. Some of the recipients mentioned beforehand may not be in the European Union. International transfers of data carried out outside of the European Union will be done in accordance with what is established within the applicable normative regarding data protection on both a national and a European level.

Legitimization: This is required in order to execute the contract.

3. **Complying with the accounting, legal, tax and administrative obligations.**

Legitimization: This is required in order to execute the contract.

4. **Sending electronically, information relating to offers and promotions for products and services being offered by Avoris Retail Division, S.L.** In order to be able to offer products and services which may be of interest, the client will be sent, for their personal assessment, offers for products and services which are related to products and services that have been provided by Avoris Retail Division, S.L.

At any moment the client may oppose to receiving these types of communications through the means outlined in section V of this Privacy Policy.

Legitimization: This is needed to satisfy the legitimate interests of Avoris Retail Division, S.L. If in the past no service has been contracted with Avoris Retail Division, S.L then the consent for sending commercial communications must be granted.

5. **Communication of your personal data to other Ávoris companies** (in accordance to article 42 of the Commercial Code) which includes for these purposes https://www.avoristravel.com/companiesandassociates_1 so that these companies may **send commercial communications or promotions of products and services that they are offering** which may be of your interest, always providing that you have given your consent.

Legitimization: This will only go ahead if Avoris Retail Division SL, has been given consent by the client.

6. **Communication of your personal data to collaborative entities that Avoris Retail Division, S.L. has a collaboration agreement with in the hospitality, catering, tourism and transportation sectors**, in order to send by both ordinary and electronic means, **commercial communications or promotions of their products and/or services**.

Legitimization: This will only go ahead if Avoris Retail Division SL, has been given consent by the client.

7. **Carrying out statistical reports or tendency reports:** Avoris Retail Division, S.L. prepares statistical reports or tendency reports which may become personalised in order to carry out activities which need to be controlled and make business decisions on an internal level.

Legitimization: This is based on the legitimate interest of Avoris Retail Division, S.L. as the reports that are carried out are used to improve the quality of the services of Avoris Retail Division, S.L. and to have an internal control of the provision of these services.

8. **Carrying out Market analysis:** Avoris Retail Division, S.L. with the aim of being able to provide its clients with more personalised services, will prepare profiles based on data that has been extracted from sales from its clients, as well as tourist preferences, travel records and financial circumstances. The information used in such profiles could have been obtained through information that the clients provided during the contractual relationship with Avoris Retail Division, S.L.

Legitimization: This will only go ahead if Avoris Retail Division SL, has been given consent by the client.

9. **Sending quality control surveys.** In order to evaluate the level of client satisfaction with the products and/or services that they contracted, they will be sent quality control surveys to get their opinion and therefore to be able to improve any aspects that need improvement.

Legitimization: This is based on the legitimate interest of Avoris Retail Division S.L. The client can always oppose to receiving these kinds of communications on behalf of Avoris Retail Division, S.L.

III.- How long will we keep your personal data for?

The personal data that can be accessed will be managed throughout the contractual relationship. Afterwards, Avoris Retail Division, S.L. will keep the personal data which will be blocked after the contract finalises and this will be made available to the competent Public Bodies, Magistrates and Courts or the Ministry of Taxation during the time limit of the shares which may have been derived through the relationship with the client and/or the conservation periods legally outlined. Avoris Retail Division, S.L. will eliminate the personal data once these time limits have passed.

Likewise, if the client has not opposed to receiving commercial communications, then Avoris Retail Division, S.L. may handle the clients personal information in accordance to what has been outlined in the present privacy policy. Should you decide that you do not wish to receive these communications then please follow the instructions in Section V.

IV.- Who will your personal data be passed on to?

Avoris Retail Division, S.L. will only communicate the client data to:

- Providing that the client has given their consent, Avoris Retail Division, S.L. will communicate client data to the Avoris companies and/or collaborators in the hospitality, catering, tourism and transportation sectors in order to send them commercial communications.
- Third parties that they collaborate with and need to receive this information for the provision of the services.
- Competent Public bodies, Magistrates and Courts.
- Apart from the previous communication of information, Avoris Retail Division, S.L. collaborates with some third party service providers that have access to clients personal data and that handle the referred information in the name of, and on behalf of Avoris Retail Division, S.L. due to the provision of their services. To be precise, Avoris Retail Division, S.L. will contract the supply of services on behalf of third party suppliers that carry out their activity, including and without limitation to the following sectors: legal advice, companies with professional multidisciplinary services, companies providing technological services, companies supplying IT services.

V.- What are your rights when you provide us with your personal data?

The user/ client may exercise, if wished, their rights to access, modify or cancel data, as well as request that the processing of their personal data be limited, oppose to this, request portability of their personal details, and also not be subjected to automatic individual decisions, by sending a written communication to the Ávoris Data Protection Office at C/ José Rover Motta, 27, 07006, in Palma de Mallorca or by sending an email to dpo@avoristravel.com enclosing in both cases to this request, a copy of their National Identity card, Tax identification number or an official document that identifies them.

The user/client may, regarding the processes which require their consent being granted, withdraw their consent following the procedure that has been detailed in the previous paragraph.

VI.- How did we obtain your data?

The personal details that Avoris Retail Division, S.L. handles is personal data gathered by the interested subjects during the contribution of this data through this webpage, as well as personal data obtained by third parties providing their services with the purpose of guaranteeing and managing the provision of these services (for examples travel reservations).

During the maintenance of the contractual relationship, Avoris Retail Division, S.L may handle data from third parties that the client may provide. In this case, the client is obliged to inform all of these people of the precautions gathered in data protection.

VII.- Before which authority can you make a complaint?

The user/client may make a complaint before the Spanish Agency of Data Protection (Agencia Española de Protección de Datos) relating to the reply that they may have received from Avoris Retail Division, S.L on assisting with their rights. By all means, they may initially contact the Ávoris Data Protection Office at the following email address: dpo@avoristravel.com or at C/ José Rover Motta, 27, 07006, Palma de Mallorca, in order to solve a complaint so that Avoris Retail Division, S.L. can help you with this matter.