

## **PRIVACY NOTICE**

### **A. Identity of the Controller**

GRUPO POSADAS, S.A.B. de C.V. and its affiliates and/or subsidiaries and/or Infiniti Caribe N.V. for the marketing of Posadas hotels (hereinafter, Posadas), with address at Av. Prolongación Paseo de la Reforma 1015, Torre A Piso 9, Col. Santa Fe de Cuajimalpa, Cuajimalpa, 05348, Mexico City; is a company committed to protecting your privacy. Our Data Protection Officer is the Personal Data Compliance Area and is located at the same address, you can contact them at the email: [datos\\_personales@posadas.com](mailto:datos_personales@posadas.com)

This Privacy Notice corresponds to the following websites belonging to Posadas:

<a href="http://posadas.com">posadas.com</a>	<a href="http://gammahoteles.com">gammahoteles.com</a>	<a href="http://takemeto.mx">takemeto.mx</a>	<a href="http://curamoria.com">curamoria.com</a>
<a href="http://liveagua.com">liveagua.com</a>	<a href="http://onehotels.com">onehotels.com</a>	<a href="http://fiestarewards.com">fiestarewards.com</a>	<a href="http://ioh-hoteles.com">ioh-hoteles.com</a>
<a href="http://grandfiestamericana.com">grandfiestamericana.com</a>	<a href="http://favc.com">favc.com</a>	<a href="http://travelsuite.mx">travelsuite.mx</a>	<a href="http://viajaconviaja.com">viajaconviaja.com</a>
<a href="http://fiestamericana.com">fiestamericana.com</a>	<a href="http://kivac.com">kivac.com</a>	<a href="http://access.favc.com">access.favc.com</a>	<a href="http://viajaplus.mx">viajaplus.mx</a>
<a href="http://fiestainn.com">fiestainn.com</a>	<a href="http://liveaguaresidenceclub.com">liveaguaresidenceclub.com</a>	<a href="http://explorean.com">explorean.com</a>	<a href="http://enjoymexico.club">enjoymexico.club</a>
<a href="http://roundtrip2x1.com">roundtrip2x1.com</a>			

### **B. Personal Data**

For the purposes indicated in this Privacy Notice, Posadas may collect your personal data in various ways: when the information is provided directly by you; when you visit the internet sites of Posadas; when you use the services offered by Posadas online by the data that you authorize Posadas to take from your social networks (Facebook, Twitter, LinkedIn, Google) or by connecting to the Wi-Fi that Posadas may offer you; and when we obtain information through means other than those indicated above and that are permitted by applicable laws.

The personal data obtained by the aforementioned means are:

1. **Identification:** name(s), surname(s), telephone number(s), marital status, email address, age, date of birth, gender, business name and ID number. Preferences related to the lodging service and/or travel needs.
2. **Physical location:** home address, tax address; dates of reservation and/or stay, hotel, date and time of flight.
3. **Authentication:** username and password, autograph signature, recording of your voice.
4. **Patrimonial:** bank card number, expiration date and security code, income level, Job.

### **C. Sensitive Personal Data**

Sensitive personal data are those personal data that affect the most intimate sphere of the owner, or whose improper use may give rise to discrimination or entail a serious risk for it. In particular, those that may reveal aspects such as racial or ethnic origin, present and future health status, genetic information, religious, philosophical and moral beliefs, union affiliation, political opinions, sexual preferences, are considered sensitive. Posadas does not collect sensitive personal data, in case you require a specific service for which you provide this data, Posadas will use it only to provide said service and meet your specific needs.

In case of health emergency (s), Posadas, in terms of the applicable regulations, will collect data related to your state of health with the sole purpose of achieving the health protection of you and the other people who are in the hotel, information that will only be kept for the time necessary to fulfill this purpose.

### **D. Purpose and Treatment of Personal Information**

Purposes that give rise to the legal relationship and are necessary for the provision of the service:

1. The personal information you provide will be used by Posadas to provide the services that you request or that are part of a program you have signed up for or a purchase you have made: reservations, purchase of vacation packages, club membership vacation, affiliation to our loyalty programs, affiliation to our referral programs, organization of events and social gatherings, purchase of tourist products and / or services; providing, where appropriate, your data to the respective supplier.
2. Posadas can use the personal information you provide to offer you a better service and, where appropriate, identify your preferences during your stay and make it more pleasant.

Purposes that do not give rise to the legal relationship or are necessary for the provision of the service and that you consent to be carried out:

1. Likewise, you can use the information to offer you promotions and tourist and commercial products, sending promotions, special services, newsletters, surveys, prize draws and other online contests, transferring your personal data to affiliated companies.
2. Data analysis can be carried out through the use of technologies in order to create profiles related to your stays and travel preferences that allow us to evaluate our service and personalize the communication and promotions designed for you.

### **E. Limitation to the Use or Disclosure of Personal Information regarding purposes that do not give rise to the legal relationship.**

In order for you to limit the use and disclosure of your Personal Information regarding purposes that do not give rise to the legal relationship, we offer you the following means:

1. In the event that you are a resident of the United Mexican States, your registration in the Public Registry to Avoid Advertising, which is in charge of the Federal Consumer Attorney, so that your personal data is not used to receive advertising or promotions of goods or services companies. For more information, you can consult the PROFECO internet portal, or get in direct contact with it.
2. Send request to the email [datos\\_personales@posadas.com](mailto:datos_personales@posadas.com), indicating the email (s) and / or telephone number (s) that require limitation.

### **F. The Exercise of the Rights of Access, Rectification, Cancellation and Opposition.**

Access, rectification, cancellation or opposition regarding the information you provide to Posadas indicated in the Federal Law on Protection of Personal Data Held by Private Parties, or in any applicable regulation, may be done by submitting the written request to the Area of Personal Data Compliance at the following address: Av. Prolongación Paseo de la Reforma 1015, Torre A Piso 9, Col. Santa Fe de Cuajimalpa, Cuajimalpa, 05348, Mexico City; from 9a.m. to 2p.m. from Monday to Friday, or to the email [datos\\_personales@posadas.com](mailto:datos_personales@posadas.com).

Such request must contain at least the following: (i) Name of the Owner of the Personal Data; (ii) Email to receive notifications; (iii) Documents that prove your identity or, where appropriate, the legal representation of the owner; (iv) Clear and precise description of the personal data with respect to which you seek to exercise the right and the right that you intend to exercise. (v) Any other element or document that facilitates the location of personal data. In the event that the request does not meet any of the requirements indicated above, the Department of Personal Data may require you within 5 days of receiving the request to provide the elements or documents necessary to process it. You will have 10 days to

attend to the request, if you do not respond within that period, the corresponding request will be considered not submitted. The terms of attention, unless the applicable regulations indicate otherwise, will be a maximum of 20 days from the date the request is received to communicate the determination adopted, so that, if appropriate, make it effective within the 15 days following the issuance of the response. The aforementioned terms may be extended only once for an equal period, as long as the circumstances of the case justify it.

In order to protect your confidentiality, Posadas will send the response to your request to the email you have provided for this purpose and will keep it available to the applicant at the address indicated in the previous paragraph.

#### **G. Of the Revocation of the Consent for the Use of your Personal Data.**

You can revoke the consent you have given us for the processing of your personal data. It is important that you bear in mind that not in all cases Posadas will be able to respond to your request or conclude immediately, since it is possible that due to some legal obligation it is required to continue treating your personal data. Likewise, you should consider that, for certain purposes, the revocation of your consent will imply that we cannot continue to provide the service you requested, or the conclusion of your relationship with Posadas.

To revoke your consent, you must submit your request in writing to the Personal Data Compliance Area at the following address: Av. Prolongación Paseo de la Reforma 1015, Torre A Piso 9, Col. Santa Fe de Cuajimalpa, Cuajimalpa, 05348, Mexico City; from 9a.m. to 2p.m. from Monday to Friday, or to the email [datos.personales@posadas.com](mailto:datos.personales@posadas.com).

The processing of such request and the attention of the same will be carried out in accordance with the provisions of Subsection F, above.

#### **H. Control and Security of personal information.**

Posadas undertakes to take the necessary measures to protect the information collected, using security technologies and control procedures in the access, use or disclosure of your personal information without authorization, for example, by storing the personal information provided on servers located in Centers of Data that have limited access controls. For online transactions, we also use security technologies that protect personal information that is transmitted to us through various electronic means such as the use of a secure server under the Secure Socket Layer (SSL) protocol.

However, no security or data transmission system of which the company does not have absolute control and/or has dependence on the internet can guarantee that it is totally secure.

#### **I. Electronic media and cookies.**

In the event that you use electronic means in relation to your personal data, cookies will be generated in order to provide you with a better service. Cookies are small pieces of information that are sent by the website to your browser.

Cookies are stored on your computer's hard drive and are used to determine your preferences when connecting to the services of our sites, as well as to track certain behaviors or activities carried out by you within our sites.

In some sections of our site, we require that the client have cookies enabled since some of the functionalities require them to work. Cookies allow us: a) to recognize you when you enter our sites and offer you a personalized experience, b) to know the personal configuration of the site specified by you, for example, cookies allow us to detect the bandwidth you have selected when entering the home page of our sites, in such a way that we know what type of information is advisable to download, c) calculate the size of our audience and measure some traffic parameters, since each browser that accesses our sites acquires a cookie that is used to determine the frequency of use and the sections of the sites visited, thus reflecting your habits and preferences, information that is useful to us to improve content, headlines and promotions for users. Cookies also help us to track some activities, for example, in some of the surveys we launch online, we can use cookies to detect if the user has already filled out the survey and avoid displaying it again, if they have. The "help" button found on the toolbar of most browsers will tell you how to avoid accepting new cookies, how to make the browser notify you when you receive a new cookie or how to disable all cookies. However, cookies will allow you to take advantage of the most beneficial features we offer you, so we recommend that you leave them enabled.

#### **J. Transfers**

Posadas only transfers personal data in the following cases:

1. In the case of Mexico, in the cases established in article 37 of the Federal Law on Protection of Personal Data Held by Private Parties. Among them is by way of example: that it is foreseen in some Law; for healthcare; for the enforcement of justice, for the fulfillment of a legal relationship between the controller and the owner and between holding companies and subsidiaries.
2. In the cases in which another international standard is applied, it will only be transferred in the cases indicated therein.
3. In the cases in which it is necessary to provide them to third party suppliers regarding the services or products that you are hiring.
4. In the cases in which you authorize the transfer of your data by physical or electronic means such as "Google Signals".

#### **K. Period of conservation of personal data.**

Your personal data will be kept as long as the legal relationship with you is maintained, until it is satisfactorily concluded, and you do not exercise your right of deletion or until you revoke your consent. In any case, the period of conservation of personal data will be restricted to the minimum necessary, so that they will only be kept as long as the purpose for which they have been collected is maintained. When its conservation is no longer necessary, Posadas will keep any data that may be necessary during the legally established deadlines to attend to any question related to its treatment or the legal relationship originated with you. After the legal deadlines, the personal data will be deleted adopting the appropriate security measures that guarantee their total destruction.

#### **L. Changes to this Privacy Notice.**

Posadas may at any time update this privacy notice. In the event of substantial changes to this notice, we will communicate it through our internet pages indicated in section A of this Privacy Notice. Therefore, we suggest you periodically visit this privacy notice to be aware of any updates.

I acknowledge and accept the terms and conditions established in this Privacy Notice, and otherwise I will communicate it to Posadas in terms of what is indicated in sections E, F and G. of this Privacy Notice.

In case of any disagreement or complaint about the processing of your personal data, you can contact the National Institute of Transparency, Access to Information and Protection of Personal Data in Mexico, or to the competent authority in the event that a regulation different from the Mexican is applied.