

# Privacy Statement

## 1. General

Through its online service oscar.redforts.com, Redforts Software S.L. processes privacy-sensitive or personal data. Redforts Software S.L. values the privacy of its customers and observes due care in processing and protecting personal data.

During the processing we stick to the requirements of the relevant privacy legislation, including (from 25 May 2018 onward) the General Data Protection Regulation (GDPR). This means we:

- clearly specify our purposes before we process personal data, by using this Privacy Statement;
- limit our collection of personal data to only the personal data needed for legitimate purposes;
- first ask for explicit permission to process your personal data in cases where your permission is required;
- take appropriate security measures to protect your personal data and we demand the same from parties who process personal data on our behalf;
- respect your right to inspect, correct or delete your personal data held by us.

Redforts Software S.L. is the party responsible for the data processing via redforts.com. Our data processing is registered with the Spanish Data Protection Authority under number AEPD-2101442725. In this privacy statement, we will explain which personal data we collect and for which purposes. We recommend that you read it carefully.

*This privacy statement was last amended on 7 May 2018.*

## 2. Use of Personal Data

By using our service, you provide the following personal data to us:

- Name
- Address
- Telephone number
- Email address
- Type of accommodation
- User name
- Password

The above information is necessary to create an account in order to use our services.

## 3. Registration

Via oscar.redforts.com you can request a demo, or a free trial or a paid subscription. After your registration we will retain your user name and the personal data you provided. We will retain this data so that you do not have to re-enter it every time you visit our online-service, to contact you in connection with the execution of the agreement, invoicing and payment, and to provide an overview of the products and services you have purchased from us.

We will not provide the data linked to your user account to third parties, unless it is necessary for the execution of the agreement you concluded with us or if this is required by law. In the event of suspicion of fraud or misuse of our online-service we may hand over personal data to the entitled authorities.

#### **4. Contact Form and Newsletter**

We have a newsletter to inform those interested of our products and/or services. When you create a free trial account, we will only send you a newsletter when you have given your consent for this. When you sign up for a paid subscription we will automatically add you to the newsletter. Each newsletter contains a link with to revoke your consent at any time by unsubscribing from our newsletter.

#### **5. Retention of Personal Data**

We will retain your account information for the duration of your paid subscription with us or for the duration of your free trial, or longer if this we are required by law to do so.

If you have no subscription and you fill out a contact form on the website or send us an email, the data you provide will be retained for three months, in order to fully answer and correctly handle your message or email. We can retain data longer if we are required by law to do so.

#### **6. Publication of Testimonials**

If you provide a testimonial, we will publish – with your explicit consent – your first name, last name and hotel name. We will retain this data for 1 year, or longer if we are required by law to do so.

#### **7. Providing Data to Third Parties**

We provide data to the following parties if this is necessary for performing our contract with you:

- Wubook SRL (our Channel Management Partner): hotel name, hotel address, hotel web address.
- TripAdvisor (for the TripConnect Program): hotel name, hotel address.
- Trivago (for the Trivago direct booking): hotel name, hotel address.
- Google (for the Hotel Ads Program): hotel name, hotel address, hotel web address.
- Cecagem S.L. (Accountancy partner ): For paying customers: name, company name, address, country, tax number.

#### **8. Google Analytics**

We use Google Analytics to track visitors on our website and to get reports about how visitors use the website. We accepted the data processing agreement from Google. We don't allow Google to use information obtained by Analytics for other Google services, and we anonymise the IP addresses.

Google is established in the United States. It is a Privacy Shield participant, meaning that the transfer of personal data to this company is allowed under EU privacy rules.

#### **9. Security**

We take security measures to reduce misuse of and unauthorised access to personal data. We take the following measures in particular:

- access to personal data requires the use of a user name and password;
- we take physical measures to protect access to the systems in which the personal data is stored;
- we make use of secure connections (Secure Sockets Layer of SSL) to encrypt all information between; you and our website when entering your personal data;
- we keep logs of all requests for personal data.

#### **10. Third-party Websites**

This statement is not applicable to third-party websites connected to this website through links. We cannot guarantee that these third parties will handle your personal data in a secure and careful manner. We recommend you read these websites' privacy statements before making use of these websites.

## **11. Changes to this Privacy Statement**

We reserve the right to modify this statement. We recommend that you review this statement regularly, so that you remain informed of any changes.

## **12. Your rights regarding your Personal Data**

You have the right to request for inspection of your personal data. You can request for correction or deletion of your personal data, when the data is incorrect or no longer relevant (within our portal, you can also access a management environment where you can set, specify and change settings yourself). You have the right to object against the processing of your personal data. You have the right to obtain a copy of your data in a usual, machine-readable format in order to be able to transfer it to another organisation. If you are of the opinion that we process your personal data in a manner contrary to applicable privacy rules, you have the right to submit a complaint with the competent data protection authority.

## **13. Contact information**

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