## PRIVACY POLICY

By accepting this Privacy Policy, the user (hereinafter, the "User" or, when appropriate, the "Users") is informed that the personal data provided will be processed by STECON SPORTS S.L., (Hereinafter, "LEVANTE GOLF"). The user must carefully read this Privacy Policy, written plainly and in a simple way in order to enable a better understanding of data processing so that the User may freely and voluntarily determine whether he or she wishes to provide his or her personal data to LEVANTE GOLF.

From LEVANTE GOLF we guarantee compliance with the following principles in order to guarantee your privacy:

- We never request personal information unless it is really necessary to provide the services that the Client requires.
- We never share personal information of our users with anyone, except to comply with the law or in case we have the express authorization of the user, or in case our suppliers need such information to provide the products and services concomitant to the contractual relationship.
- We will never use your personal data for a purpose other than that expressed in this privacy policy.

It should be noted that this Privacy Policy can be modified in order to adapt to new regulatory requirements, so users are advised to visit it periodically.

LEVANTE GOLF has adapted this website to the requirements of the General Data Protection Regulation (GDPR) 2016/679 and the Spanish Organic Law 3/2018 of December 5 on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD), as well as Law 34/2002, of July 11, on Services of the Information Society and Electronic Commerce (LSSICE or LSSI). For the treatment of our users' data, we implement all the technical and organizational security measures established in current legislation.

## Responsible for the treatment of personal data

- Corporate name: STECON SPORTS S.L., (Hereinafter, LEVANTE GOLF).
- VAT Number: B-05540182
- Address: C/TURBINTOS, 34, Puerta B, 30150, LA ALBERCA, MURCIA.
- Email: info@levantegolf.com

## Principles that we will apply to your personal information

In the processing of your personal data, we will apply the following principles that meet the requirements of the new GDPR:

- Legality, loyalty and transparency: We will always require your consent for the processing of your personal data for one or more specific purposes of which we will inform you in advance with absolute transparency.
- Data minimization: We will only request strictly necessary data in relation to the purposes for which we require them.
- Limitation of the storage period: the data will be kept for no longer than necessary for the purposes of the treatment, and once it has ended, for the period of prescription of the legal actions that may derive from it.
- Integrity and confidentiality: Your data will be treated in such a way that
  adequate security of personal data is guaranteed and confidentiality is
  guaranteed. LEVANTE GOLF will take the necessary precautions to prevent
  unauthorized access or improper use of our users' data by third parties.

#### How have we obtained your data?

The personal data we process comes from:

- Contact Us Form
- Newsletter Form
- Guest Booking Form
- Email

# What are your rights when you provide us with your data?

The Users are entitled to exercise, at any time and free of charge, the following rights, which are recognized to the data subject in accordance with the GDPR:

- Right of Access: the User has the right to obtain from LEVANTE GOLF
  confirmation as to whether or not personal data concerning him or her are
  being processed, and, if so, access to the personal data and information on the
  purposes of the processing, the categories of personal data concerned, the
  recipients to whom the personal data is disclosed, and the envisaged period for
  which the personal data will be stored, among other information.
- Right of Rectification: the User has the right to modify or rectify their inaccurate data provided by LEVANTE GOLF.
- Right of Cancellation: the User has the right to cancel their personal data, when they are no longer needed, from the LEVANTE GOLF database.
- Right of Opposition: the User has the right to oppose the use of their data for a purpose that is not chosen, of the services provided by LEVANTE GOLF.
- Right of Data Portability: the User has the right to request the change of file in an automated file for another company, from the LEVANTE GOLF database, in the cases foreseen in the regulations to this effect.
- Right of Limitation: the User has the right to limit the use and term of the use of their data by LEVANTE GOLF, in which case they will only be kept according to tax legislation and for the exercise of claims.
- Right of Withdrawal (Right to Forgetfulness): the User has the right to request the deletion of their history, if applicable, on the Internet (See GDPR).

Additionally, the User may lodge a complaint in relation to the processing with the supervisory authority, in particular, with the <u>Spanish Data Protection Agency</u>, when he or she considers that his or her rights set forth in the applicable regulations have been violated.

The aforementioned rights may be exercised in the address indicated in the header of this Privacy Policy, or by email to the following email address: <a href="mailto:info@levantegolf.com">info@levantegolf.com</a> provided the User proves his or her identity by any means.

### For what purpose do we treat your personal data?

When a user connects to this website for example to comment on a post, send an email to the owner, subscribe or make a contract, he is providing personal information for which LEVANTE GOLF is responsible. This information may include personal data such as your IP address, name, physical address, email address, telephone number, and other information. By providing this information, the user gives their consent for their information to be collected, used, managed and stored by LEVANTE GOLF, as described in the Legal Notice and in this Privacy Policy.

There are different systems for capturing personal information and we treat the information provided by interested persons in the following ways:

- Contact Us form: The following personal data are requested: Name, Email, telephone, country and other information that can be provided in the body of the message, to respond to the requirements of the users of the web. We can use this information to respond to your request and respond to doubts, complaints or comments about the information included on the website, the services provided through the website or the processing of your personal data.
- Guest Booking Form: When filling in the fields in the "Guest Booking Form" section, the following personal data are requested: personal details, contact details, special dietary requirements and other information that can be provided in the body of the message of special requests. We can use this information in order to provide the services of LEVANTE GOLF and manage the online reservation made by the Client.
- Other non-identifying data that are obtained through some cookies that are downloaded to the user's computer when browsing this website that are detailed in the Cookie Policy are also collected.

LEVANTE GOLF will not transfer personal data that can identify the user to third parties without prior consent.

#### Legitimation for the treatment of your data

The processing of the User's data by LEVANTE GOLF is based on the performance of the contract for the provision of a service to which the User is party, as well as, depending on the case, the consent of the User that is obtained from the User, who might withdraw it at any time.

- Contact form: The processing of data with this purpose is based on the consent of the User, who may withdraw it at any time. In the event that the User withdraws his or her consent, LEVANTE GOLF would not be able to process the enquiry submitted.
- 2. Guest Booking Form: The processing of data with this purpose is based on the fulfilment of the contractual relation.

### Term of conservation of your data

The data provided by the User will be stored for the following periods:

- Data used for answering to the inquiries made by the User through the form provided for this purpose: such data will be stored for the period of time necessary to attend to your request, and even further for the period of prescription of the legal actions that may derive from it.
- Data provided for the managing of the contractual relation with the User for the
  provision of the services rendered by LEVANTE GOLF: such data will be stored as
  long as the contractual relation is in force, and once it has ended, for the period
  of prescription of the legal actions that may derive from it.

## Commercial and promotional communications

One of the purposes for which LEVANTE GOLF processes the personal data provided by the User is for the submission of electronic communications with information regarding activities, services, competitions, special offers and/or promotions about the services offered by the Controller.

Should the User wish to stop receiving commercial or promotional communications from LEVANTE GOLF, he or she may request cancellation of the service by sending an email to the following email address: <a href="mailto:info@levantegolf.com">info@levantegolf.com</a> or indicating it by means of the unsubscribe option provided in each of the commercial communications that are sent.

### Liability of the User

The User guarantees that he or she is over eighteen (18) years old and that the data he or she provides to LEVANTE GOLF is real, accurate, complete and updated. To this effect, the User is responsible for the veracity of the data that he or she provides, and will keep it updated so that it reflects his or her current state.

The User guarantees that, when he or she provides personal data concerning third-parties, the User has informed them of the content of this Privacy Policy. Moreover, the User undertakes to have obtained the consent of the data subject to give his or her data to LEVANTE GOLF for the aforementioned purposes.

The User is responsible for the inaccurate, false or out-of-date information that he or she provides to the Controller, and for the damages, both direct and indirect, that this may cause to third-parties.

#### Security measures

LEVANTE GOLF will process at all times the personal data of the User in a confidential manner and keeping the duty of secrecy with regard to said data, in compliance with the applicable regulations. LEVANTE GOLF has implemented appropriate technical and organizational measures to ensure the safety of the data and to avoid its alteration, loss, unauthorized access or processing, taking into account the nature, scope, context and purposes of processing as well as the risks.

When a security incident occurs, when LEVANTE GOLF realizes, it must notify the user and must provide the appropriate information related to the security incident when it is known.

#### Acceptance and consent

The user declares to have been informed of the conditions on protection of personal data, accepting and consenting to the treatment of them by LEVANTE GOLF in the manner and for the purposes indicated in this privacy policy.

### Revocability

The consent given, for the treatment of the data of the interested parties, is revocable at any time by communicating it to LEVANTE GOLF in the terms established in this Privacy Policy for the exercise of their right.

### Changes to the privacy policy

LEVANTE GOLF reserves the right to modify this policy to adapt it to legislative developments, as well as to industry practices. In these cases, on this same page, the changes introduced will be announced with reasonable anticipation of their implementation.

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