

# Privacy Policy - Hotel Vall Amagada del Molí, S.L.

Legal Department

Last Updated: 21/08/2025

## 1 Extended Legal Framework

This Privacy Policy is comprehensive and complies with:

- General Data Protection Regulation (EU) 2016/679 (GDPR)
- Spanish Organic Law 3/2018 on Data Protection and Digital Rights Guarantee
- Catalan Data Protection Authority (APDCAT) guidelines
- Spanish Tourism Sector Regulations
- ePrivacy Directive (2002/58/EC)
- Royal Decree-Law 14/2019 on Urgent Measures on Digital Urgency

## 2 Additional Data Processing Considerations

### 2.1 Special Categories of Personal Data

We acknowledge special protections for sensitive data categories:

- Health information (e.g., dietary requirements, accessibility needs)
- Racial or ethnic origin
- Religious or philosophical beliefs
- Biometric data

Such data will be processed only with:

1. Explicit consent
2. Necessary for substantial public interest
3. Protection of vital interests

## **2.2 Minors and Vulnerable Persons**

- Data processing for guests under 14 requires parental consent
- Special protection for vulnerable individuals
- Guardianship documentation may be required for bookings

## **3 Specific Regional Compliance**

### **3.1 Catalan Specific Regulations**

- Compliance with Catalan Tourism Law 13/2002
- Registration with Catalan Tourism Registry
- Adherence to APDCAT recommendations

### **3.2 Spanish Hospitality Sector Requirements**

- Guest registration book (Libro de Registro de Viajeros)
- Mandatory guest identification documentation
- Collaboration with local and national authorities

## **4 Extended User Rights**

Beyond standard GDPR rights, users can:

- Request automated decision-making explanation
- Challenge algorithmic profiling
- Request human intervention in automated processes
- Obtain free data transfer between service providers

## **5 Data Breach Protocol**

1. Immediate notification to AEPD within 72 hours
2. Comprehensive incident documentation
3. User notification if high-risk data compromised
4. Detailed forensic investigation
5. Preventive measure implementation

## **6 International Data Transfers**

- Strict adherence to EU-approved transfer mechanisms
- Standard Contractual Clauses (SCCs) for non-EU transfers
- Ongoing assessment of data protection levels

## **7 Contact Information**

- Data Protection Officer (DPO):
  - Email: [dpo@vallamagada.com](mailto:dpo@vallamagada.com)
  - Phone: +34 872 290 726
- Supervisory Authorities:
  - Spanish Data Protection Authority (AEPD)
  - Catalan Data Protection Authority (APDCAT)

## **8 Consent Withdrawal**

Users can withdraw consent through:

- Written communication
- Email
- Dedicated online portal
- In-person at hotel reception