

# FULL PRIVACY NOTICE AFFILIATES

## A. IDENTITY AND DOMICILE OF THE DATA CONTROLLER

In accordance with the Federal Law on Protection of Personal Data Held by Private Parties (hereinafter referred to as LFPD) and in accordance with applicable provisions, **Palace Elite Resorts, S.A. de C.V.** (hereinafter and indistinctively referred to as "Palace Elite Resorts®" or as "Data Controller") having corporate domicile for hearing and being served notices at Carretera Cancún Puerto Morelos Km 21, Manzana 01, Lote 1 – 11, Edificio A, Supermanzana 47, Municipio Benito Juárez, Cancún, Quintana Roo, C.P. 77506, expressly informs:

## B. PERSONAL DATA COLLECTED AND SUBJECTED TO PROCESSING.

In order to fulfill the purposes described herein, we collected the following types of personal data:

Identifiable Data.

Personal Characteristics Data.

Economic, Financial and Insurances Data.

## C. PROCESSING OF SENSITIVE PERSONAL DATA.

The Data Controller does not collect any sensitive personal data for any of the purposes listed below.

## D. PROCESSING PURPOSES.

### a. Initial and Necessary Purposes

To provide the expressly engaged services, under any of modalities thereof, as an affiliate or Palace Elite Resorts®.

To secure the functionality and quality of the benefits acquired, by means of the hiring or confirmation of the services rendered by third-parties which services are or have been requested by the users themselves before or during the stay thereof.

To allow you access to our on-line services.

To notify you about any changes performed to our services.

To invoice the rendered services and the supplied products, as well as to conduct the judicial or extrajudicial collection thereof.

To submit any communications about any offers and new products and/or services rendered by Palace Resorts®.

To make the statistics and the historical registry of the affiliates.

### b. Additional Purposes

To make satisfaction surveys.

In addition to the foregoing, we inform you that the personal data corresponding to third-parties, which you provide to Data Controller for the compliance with the purposes described above (e.g. family data) shall be provided after such people has been informed on the existence of the processing and on the contents hereof.

#### **E. ADDITIONAL PURPOSES. PROCESSING DENIAL.**

I do not want to participate in satisfaction surveys.

You may, at all times, revoke your consent for the processing of your personal data with regard to the described additional purposes, by means of the mechanisms contained herein and pursuant to the effective legislation.

#### **F. TRANSFER OF PERSONAL DATA.**

Your personal data (including your sensitive data) may be transferred and processed by people different from Data Controller. Addressees of transferences (either national or international) correspond to the following categories:

**Holding, Subsidiary or Affiliate Corporations of Palace Elite Resorts®** having centralized-information protection, registration and un-registration control, changes to services provision thereof and Data Controller's users' statistics preparation purposes in an aim to assess, improve and design new services for said users.

**Unaffiliated Third-Parties (Service Providers)** for the sole and exclusive purpose that such third-parties help Palace Elite Resorts® in providing the services related to service rendering thereof and in engaging additional necessary services or services expressly requested by Data Subject during the stay thereof (observance of the legal relationship between Data Controller and Data Subject / compliance with the agreements executed or to be executed in Data Subject's best interest by Data Controller and a third-party).

**Collection Companies** to recover any unpaid credits and to judicially or otherwise collect them.

**Business Partners** for promoting and/or sponsor any products, services and special offers.

#### **G. DATA TRANSFER CONSENT.**

The Personal data transfer referenced at numbers from 1 to 3 above do not require your consent for the conduction thereof, pursuant to the provisions of LFPD article 37.

For the conduction of the transfer of the personal data mentioned under number 4 above, we require your consent.

I consent that my data is transferred to third-parties identified as "Business Partners" for the purposes described above.

The knowledge and acceptance hereof through the electronic means which Grupo Palace Resorts® and Palace Elite Resorts® use for collecting personal data, particularly the webpage [www.palaceelite.com](http://www.palaceelite.com) entails that you award your consent for your personal data being transferred to "Business Parties".

At all times, you may inform to Palace Elite Resorts® that you intend to withdraw your consent for the future transfer of your personal data.

For the rest of the events, your personal data shall not be transferred to any third-parties without your consent, except for exceptions contained at article 37 of the LFPD. Transfer thereof shall always meet the conditions set forth at article 37 of the LFPD.

#### **H. ARCO RIGHTS EXERCISE.**

or all legally possible cases, you may, at all times, enforce your access, rectification, cancellation and opposition rights (hereinafter referred to as ARCO rights) through procedures we have implemented.

Your request shall comply with requirements set forth on the effective legislation, by means of a document addressed to our Chief Privacy Officer, whose domicile is Carretera Cancún Puerto Morelos Km 21, Manzana 01, Lote 1 – 11, Edificio A, Supermanzana 47, Municipio Benito Juárez, Cancún, Quintana Roo, C.P. 77506.

The request shall contain the following information:

Your name and domicile or any other means for letting you know the answer to your request;

The documents proving your identity or, if applicable, your power of attorney;

A clear and precise description of the personal data with regard to which any ARCO rights are to be enforced; and

Any other element or document which makes it easy to locate personal data.

Data Controller shall inform to you, within a twenty business day maximum term from the date when Data Controller receives the relevant request, on the adopted determination. If your request is accepted, it shall be conducted within a fifteen business day term after the date when Data Controller communicates the answer. In case the information provided in your request is mistaken or insufficient, or in the event that documents required for proving your identity or power of attorney are not enclosed thereto, Data Controller, within the five business days after your request had been received, shall demand that deficiencies are corrected in order to process your request. In these cases, you shall have ten business days for the performance of the correction; which period shall commence on the day after receipt thereof. It shall be deemed that the relevant request has not been submitted should you do not answer within said term.

You may obtain the requested information or personal data through single copies thereof, electronic documents in conventional formats (Word, PDF, etc.), by means of a restricted and authorized access to the system processing your personal data (access) or through any other lawful means guaranteeing and accrediting the efficient exercise of the requested right.

Alternatively, the Data Subject may address the request to [derechosarco@palaceresorts.com](mailto:derechosarco@palaceresorts.com), meeting all the aforementioned requirements, stating as subject thereof as follows: "ARCO Rights and/or Revocation of Consent". Procedure terms shall be the same mentioned at paragraph above. The usage of electronic means for enforcing the ARCO rights authorizes the Data Controller to answer the relevant request through the same means thereof, unless the Data Controller clearly and expressly establishes any other means for such purposes.

You shall be responsible for updating your personal data held by the Data Controller; therefore, you guarantee and shall be liable, in any case, for the veracity, accuracy, effectiveness and authenticity of personal data provided and bind to keep such data updated, communicating any change to Data Controller.

#### **Consent Revocation**

You may revoke your consent for the processing of your personal data, without any retroactive effects, in all cases where such revocation does not entail that it will be impossible to fulfill any obligations arising from an effective legal relation between you and Data Controller.

The procedure for revoking the consent, if applicable, shall be the same one that is set forth at the foregoing section for the exercise of the ARCO rights.

#### **J. LIMITATIONS TO THE DISCLOSURE OF YOUR PERSONAL DATA.**

You may limit the use or disclosure of your personal data by addressing the relevant request to our Personal Data Department. Requirements for proving your identity, as well as the procedure for taking care of your request shall be the same as those indicated at section H) hereof (Exercise of the ARCO rights).

#### **K. AUTOMATED MEANS FOR COLLECTING PERSONAL DATA**

Palace Elite Resorts® uses cookies for facilitating the surfing the webpage [www.palaceelite.com](http://www.palaceelite.com). Said cookies constitute a tool used by web servers for saving and recovering information saved at the browser used by the users or visitors of the webpage that allows saving the personal preferences thereof to provide a better surfing experience.

The cookies have an expiry date, which may vary from webpage session or visit lasting to a specific date from which cookies shall stop functioning. Most cookies used at [www.palaceelite.com](http://www.palaceelite.com) only relate to an anonymous User and the informatics equipment thereof, cookies do not provide any references which allow deducting the name and last name of the User. Cookies cannot read any data from your hard disk nor infect your texts with any viruses.

We can also collect information by using web beacons, pixel tags, clear gifs or any similar means (generically referred to as "web beacons") which allow us to obtain non-personal or added information; for instance, domain names, the areas of the site you are visiting, your operating system, the version of the operating system you use, the version of the browser and the URL before your visit. Said information is used to improve your experience at the site and to understand traffic patterns.

It is also possible that we may use advertisements of third-parties at our sites. Said advertisers may also use cookies and pixel tags to identify among other things, the advertisements you have been displayed and webpages thereof.

Palace Elite Resorts® does not have the control over the usage of said technology by third-parties; therefore we cannot be liable for actions and policies thereof.

You may configure your browser to automatically accept or reject all cookies or to be displayed a notice on screen about the receipt of each cookie and to decide on that moment if it shall be implanted on the hard disk or not. We suggest you to consult the help section of your browser in order to know how to change the configuration of the acceptance or rejection of cookies. Even when you configure your browser for rejecting all cookies or for expressly rejecting the cookies of [www.palaceelite.com](http://www.palaceelite.com), you may surf the website with the one inconvenient of not enjoying the functions of the site which require the installation of some cookies. In all cases, you may, at any time, eliminate the cookies of [www.palaceelite.com](http://www.palaceelite.com) implanted on your hard disk, by following the procedure established under the help section of your browser.

#### **L. AMENDMENTS OR UPDATING HERETO**

The Data Controller may amend, update, extend or otherwise change the terms, conditions and scope hereof at any time at its entire discretion. In which event, Palace Elite Resorts® shall publish such changes at the website [www.palaceelite.com](http://www.palaceelite.com).

#### **M. CANCEL SUBSCRIPTION**

"Users may receive one or more emails with offers, products or services per day related with Palace Elite. Users may cancel their Email news subscription at any time, partially or definitely, clicking on "cancel subscription" link located at the bottom of every Email sent by Palace Elite."

### **AFFILIATE INFORMATION**

#### **Identity and domicile of Data Controller**

In accordance with the Federal Law for the Protection of Data Held by Individuals (hereinafter referred to as LFPD) and in accordance with applicable provisions, **Palace Elite Resorts, S.A. de C.V.** (hereinafter and distinctively referred to as "Palace Elite Resorts®" or as the "Data Controller") having corporate domicile for hearing and receiving notifications at Carretera Cancún Puerto Morelos km 21, Manzana 01, Lote 1 – 11, Edificio A, Supermanzana 47, Municipio Benito Juárez, Cancún, Quintana Roo, Zip Code 77506, expressly informs:

#### **Personal Data Collected and Subjected to Processing.**

For the fulfillment of the purposes described herein, we collect the following personal data categories:

Identity Data

Personal Data

Social Circumstances Data

Labor Data

Economy, financial and insurance data

Additionally, we inform to you that the personal data of third-parties provided by you to the Data Controller for the fulfillment of the purposes identified (for instance, data of recommended people or references) shall be provided after they have been informed over the existence of the processing and over the content hereof.

#### **Processing of Sensitive Personal Data.**

Data Controller does not collect any sensitive personal data for the purposes listed herein below.

Purposes of the Processing.

Initial and Necessary Purposes

To inform to the interest party about the benefits of the affiliation to Palace Elite Resorts, including modalities and prices thereof.

To facilitate the engagement of the services offered by Palace Elite Resorts®.

To consult the credit history and the credit request.

**Additional Purposes.**

Submitting communications on offers and new products and/or services provided by Palace Elite Resorts®.

**Additional Purposes. Processing Denial.**

I do not want to receive any communications on offers and new products and/or services provided by Palace Elite Resorts®.

**Personal Data Transference.**

Your personal data may be transferred and processed by people different from Data Controller. The recipients of such transferences (either national or foreign) correspond to the following categories:

**Credit information corporations**, in order to guarantee that the interested parties have an appropriate credit history for the affiliation to Palace Elite Resorts®.

**Financial Entities**, in order to request the personal credits for your affiliation to Palace Elite Resorts®.

**Data Transference Consent.**

In order to conduct the personal data transferences mentioned under numbers 1 and 3 of section herein above, we require your consent for the conduction thereof.

I consent the transference of my data to the third-parties identified as "Credit information corporations" and/or "Financial entities", for the identified purposes.

For the rest of the cases, your personal data shall not be transferred to third-parties without your consent, except for the cases contemplated at LFPD article 37. In which case the transference shall be conducted while complying with the conditions described at LFPD Regulations article 17.

**Exercise of the ARCO rights.**

In all cases legally applicable, at all times, you may exercise your access, rectification, cancellation and opposition rights (ARCO rights) by means of the procedures we have implemented.

The relevant request shall meet the requirements of the effective legislation, by means of a document addressed to our Personal Data Responsible at Carretera Cancún Puerto Morelos km 21, Manzana 01, Lote 1 – 11, Edificio A, Supermanzana 47, Municipio Benito Juárez, Cancún, Quintana Roo, C.P.77506.

The request shall contain the following:

Your name and domicile or any other means to answer your request.

The documents proving your identity or, if applicable, your legal powers.

A clear and precise description of the personal data with regard to which any ARCO Rights are to be enforced.

Any other element or document facilitating the localization of your personal data.

Data Controller shall inform to you, within a maximum term of twenty business days, from the date when Data Controller receives the relevant request, the resolution thereof. In case the request was accepted, the request shall become effective within the fifteen business days after the date when Data Controller communicates the resolution. In the event the information provided at your requests turns out to be untrue or insufficient or in the event they are not included the documents required to prove your identity or the relevant legal powers, the Data Controller, within the five business days after the receipt of the request, shall require that deficiencies be corrected in order to process the request. In which case, you shall have

ten business days to fulfill the correction requirement, from the day after receipt thereof. The relevant request shall be deemed as not presented in case you fail to conduct the correction within said term.

You may obtain the requested information or personal data by means of simple copies, electronic documents in conventional format (Word, PDF, etc.), by means of a restricted access authorized to the system processing your personal data (access) or through any other lawful means guaranteeing and accrediting the effective exercise of the requested right.

Alternatively, the Data Subject may address his request through the address [derechosarco@palaceresorts.com](mailto:derechosarco@palaceresorts.com), fulfilling all the aforementioned requirements, establishing as Subject of the communication "ARCO Rights and/or Revocation of the consent". The terms for the proceeding shall be the same as the ones mentioned in the foregoing paragraph. The use of the electronic means for the enforcement of the ARCO rights authorizes data subject to reply the relevant request through the same means, unless data subject himself expressly and clearly indicates otherwise.

You shall be responsible for the updating of your personal data possessed by the Data Controller. Therefore, you guarantee and shall bear the cost, at any time, for the truthfulness, accuracy, effectiveness and authenticity of the personal data provided. You commit to duly update them and to notify so to the Data Controller.

#### **Consent Revocation.**

You may revoke your consent for the processing of your personal data, without any retroactive effects, in case such a revocation does not entail that it is not possible to fulfill the obligations arising from an effective legal relation between you and the Data Controller.

The procedure for the revocation of the consent, if applicable, shall be the same as the one established in section above for the exercise of the ARCO rights.

#### **Limitations to the Disclosure of Your Personal Data.**

You may limit the usage or disclosure of your personal data by addressing the relevant request to our Personal Data Department. The requirements for accrediting your identity, as well as the procedure for processing your request shall be the same as the ones indicated at section G) hereof (ARCO rights exercise).

#### **Amendments or Updating to this Comprehensive Privacy Notice.**

The Data Controller may amend, update, extend or otherwise change the form, content and scope hereof at any time and at its sole discretion. In such cases, Palace Elite Resorts® shall publish said amendments in the website [www.palaceelite.com](http://www.palaceelite.com), section "News Room".