

PRIVACY POLICIES



RESPONSIBLE FOR THE TREATMENT FLY GRAN CANARIA, S.L.	c/ Madrid, 4- 35130 de Mogán CIF. B76353572 Email: info@flygrancanaria.com From now on FLY GRAN CANARIA
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This policy defines the terms of use for the domain www.flygrancanaria.com and its social networks on **Facebook**, **Twitter** and **Instagram** so we encourage you to read these privacy terms.

FLY GRAN CANARIA wishes to inform the users of the website, and especially its clients and users, of its policy regarding the treatment and protection of the personal data of users and clients that it collects from them when viewing the site or using the services offered on it.

Personal data means any information relating to an identified or identifiable natural person ("the data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

MINORS

In no case will data be collected from minors, since we only allow the registration of users and the contracting of services through our website to persons of legal age with full capacity to act in legal traffic. If you are a minor and have accessed this website, we warn you that you will not be able to register. In this sense, **FLY GRAN CANARIA** has established a procedure in order to guarantee at all times that whoever requests the registration, not only is of legal age, but also that they comply with the professional requirements demanded for the proposed practice.

COMMITMENT

FLY GRAN CANARIA has made an effort to create and maintain a safe and reliable space in which we can give full development to the professional practice, that is why we raise as a flag some principles that will make you feel safe:

- 1.- We will never request personal information that is not strictly necessary for the provision of the service.
- 2.- We will never share personal information with anyone, except as required by law or with your express consent.

3.- We will never use the information you have provided for a purpose other than that which was collected and expressed at the time you provided it.

FLY GRAN CANARIA will modify the present policy of privacy whenever it is necessary to adapt the same one to any legislative, regulation change, or with the purpose of adapting this policy to the instructions dictated by the Agency of Protection of Data. In this sense, **FLY GRAN CANARIA** recommends users to **read these policies periodically** so that users can be aware of any changes made to them.

The collection of personal data, the treatment and its later use are subject to the legislation in force in Spain in the matter of data protection, as well as according to the new RGPD of the European Union and other complementary norms that are developed. **FLY GRAN CANARIA** will only be responsible for and guarantee the confidentiality and security of the personal data collected from the user through the website www.flygrancanaria.com and will not be responsible for the processing and subsequent use of personal data that may be carried out by third party service providers of the information society acting outside the website.

PURPOSES

The personal data provided through the registration and contact form on the page will be processed by **FLY GRAN CANARIA** for the purposes detailed in this section. Users, by checking the box, expressly agree in a clear, free and unequivocal way that their personal data will be treated by the provider for the following purposes:

1. Registration of clients and opening of accounts.
2. Registration of legal representatives.
3. Invoicing management.
4. Collection management.
5. For the management of commercial events of the brands we represent.
6. Sending of communications related to the exercise of our own commercial activity.
7. Historical and statistical purposes.

CONTACT AND WEB FORMS. We can treat your IP, what operating system or browser you use, and even the duration of your visit, anonymously.

If you provide us with data in the contact form, you must identify yourself in order to be contacted, if necessary:

- Answer your questions, requests or applications.
- Manage the requested service, answer your request, or process your request.
- Information by electronic means, concerning your request.
- Commercial or event information by electronic means, provided that there is express authorization.
- To carry out analysis and improvements on the Web, about our products and services. Improve our professional and communication strategy.

Acceptance and consent of the interested party: In those cases where in order to make a request it is necessary to fill in a form and click on the send button, doing so will necessarily imply that you have been informed and have expressly given your consent to the content of the clause attached to said form or acceptance of the privacy policy.

WHEN IS PERSONAL DATA COLLECTED FROM USERS ON THE WEBSITE?

FLY GRAN CANARIA informs its users that the collection of personal data is done through the completion of forms and email addresses in the section "Contact" as well as in the site "REGISTRATION" and "RESERVATION".

If you do not want **FLY GRAN CANARIA** to process your personal data, please refrain from filling out the forms on the website. In any case, **FLY GRAN CANARIA** will inform you expressly and legibly about the conditions in which personal data are collected and the purposes for which they will be used, the obligation to provide them or not, the rights of the user, the conditions in which they can be exercised, and any other complementary information that may be necessary.

Processing of personal data shall mean any operation or set of operations performed upon personal data or upon sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, limitation, erasure or destruction.

The lender informs and guarantees expressly to the users that their personal data will not be yielded in any case to third companies, and that whenever some type of cession of personal data was going to be made, in a previous form, the express, informed, and unequivocal consent would be asked for on the part of the holders.

The provider expressly informs and guarantees that no international transfers of data to third countries will be made.

All data requested through the website are mandatory, as they are necessary for the provision of an optimal service to the user. In the event that not all the data are provided, the provider does not guarantee that the information and services provided will be completely adapted to your needs.

MANDATORY OR OPTIONAL NATURE OF THE INFORMATION PROVIDED BY THE USER

The USERS, by marking the corresponding boxes and entering data in the fields, marked with an asterisk (*) in the contact form or presented in download forms, accept expressly and freely and unequivocally, that their data are necessary to meet their request, by the provider, being voluntary the inclusion of data in the remaining fields. The USER guarantees that the personal data provided to the RESPONSIBLE are true and is responsible for communicating any changes to them.

The LIABILITY MANAGER informs that all the data requested through the website are mandatory, since they are necessary to provide an optimal service to the USER. In case all the data are not provided, it is not guaranteed that the information and services provided will be completely adjusted to your needs.

WHAT PRINCIPLES WILL WE APPLY TO THE PROCESSING OF YOUR DATA?

We will apply the following principles to the processing of personal data, which are in line with the requirements and demands of the new General Data Protection Regulation and whose philosophy and purpose we fully share. They are the following:

- *Personal data must be processed in a lawful, loyal and transparent manner.*
- *Personal data must be collected for specific, explicit and legitimate purposes.*
- *Personal data must be adequate, relevant and limited to what is necessary in relation to the processing.*
- *Personal data should be accurate and always up to date.*
- *Personal data should be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes of the processing.*
- *Personal data should be processed in a way that ensures their security.*

WHAT IS THE LEGITIMACY WE HAVE TO TREAT YOUR DATA?

LEGITIMATION	<p>Below, we explain the legal basis that allows us to use your data:</p> <ol style="list-style-type: none">1. When you give us your consent.2. Fulfilment of the contractual relationship.3. For legitimate interest. In order to better meet your expectations and increase your level of satisfaction as a customer by developing and improving the quality of the services we provide that may be of interest to you. To achieve this objective we need to treat your information anonymously without any characteristics that could identify you. <p>Also, for legitimate interest, FLY GRAN CANARIA wants to maintain a close and familiar treatment with their customers so in our professional relationship, we could congratulate you for the holidays or special dates.</p> <p>These legitimate interests respect your right to personal data protection, honour and personal and family privacy. It is desirable and required that from FLY GRAN CANARIA you have a reasonable expectation that your data will be used anonymously (applying security measures and techniques that guarantee confidentiality and prevent your identification) so that we can improve the services we provide to the professional group that we serve and of which you are part. Remember that, in cases based on legitimate interest, you can always exercise your right of opposition if you consider it appropriate to the address info@flygrancanaria.com</p>
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Who will we communicate your data to? Recipients.

RECIPIENTS	<p>We will not pass on your personal details to third parties, unless we are obliged by law or you have given your unequivocal, clear and express consent. Nor will there be any international transfer of data.</p> <p>In any case, data will be communicated or transferred to:</p> <ul style="list-style-type: none">• Public Services responsible for the production of official statistics.• Insurance companies, due to the existence of compulsory insurance, or with the client's consent, of professional responsibility.• To service providers who act as data processors.• Media and diffusion when carrying out business, training, social and/or leisure events, including the corporate website and its social networks.• In the event of non-payment, to communicate their data to companies of patrimonial solvency.• Any other that results from the regulations in force.
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WHAT ARE YOUR RIGHTS WHEN PROVIDING US WITH YOUR DATA?

Right of Information: you have the right to be informed clearly BEFORE your data is collected about what data of yours is being processed, for what purpose it is being processed, where the data has been obtained and whether it will be communicated or has been communicated to anyone.

Right of Access: to know what data of yours is being processed, for what purpose it is being processed, where the data has been obtained and whether it will be communicated or has been communicated to anyone.

Right of Rectification: to modify your data that is inaccurate or incomplete.

Right of Cancellation: to cancel your inadequate or excessive data.

Right of Opposition: to prevent your data from being processed or to prevent them from being processed any further, but only in the cases established by law.

Right to Limit Processing: to request that the processing of your data be suspended in the cases established by law

Right to Data Portability: in order to receive your data provided in a structured electronic format and of habitual use and to be able to transmit them to another person in charge.

Right not to be the object of individualized decisions: so that no decision is taken about you that produces legal effects or affects you based only on the processing of your data.

- Any client has the right to obtain confirmation as to whether or not **FLY GRAN CANARIA** is processing personal data concerning them. Interested persons have the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

- In certain circumstances, data subjects may request that the processing of their data be limited, in which case we will only keep them for the exercise or defence of claims. You may request limitation of processing in the following cases:

1. While the accuracy of your data is being verified.
2. When the processing is unlawful, but you oppose the deletion of the data.
3. When FLY GRAN CANARIA does not need to treat your data, but you need them for the exercise or defense of your claims.
4. When you have opposed to the treatment of your data for the fulfilment of a public interest mission or for the satisfaction of a legitimate interest, while it is verified if the reasons for the legitimate interest for the treatment prevail over your own.

- In certain circumstances and on grounds relating to their particular situation, data subjects may object to the processing of their data. The **FLY GRAN CANARIA** will stop processing the data, except for legitimate reasons, or the exercise or defense of possible claims.

- In certain circumstances and for reasons related to their particular situation, the interested parties may request the portability of their personal data. You will be able to receive, in electronic format, the personal data that you had facilitated to us and those that have been obtained of your collegiate relation with **FLY GRAN CANARIA**, as well as to transmit them to another professional association.

- We warn you of your right to withdraw, at any time, the consent given to treat your data, without affecting the legality of the treatment based on the previous consent to its withdrawal.

- If you consider that we have not processed your personal data in accordance with European and national regulations, we remind you, by legal imperative, of your right to file a complaint with the Spanish Data Protection Agency (www.agpd.es), if you consider that the processing of your data is not in accordance with European regulations.

- You can exercise your rights, proving your identity (photocopy of ID card), by sending an email to the address: info@flygrancanaria.com

- The exercise of these rights is free of charge.

- Also, at any time, you can withdraw the consent given without affecting the legality of the treatment by sending your request to the address above or by going to the central offices of **FLY GRAN CANARIA**. Remember to accompany the request with your ID card or equivalent document proving your identity.

HOW LONG WILL WE KEEP YOUR DATA?

STORAGE TIME	Depending on the type of data being processed: <ul style="list-style-type: none">• The personal data provided will be kept for as long as the client is a client.• The data will be kept for an indefinite period of time, as long as the interested party does not request its deletion.• For the duration of the legal obligations imposed in the tax and/or commercial field.• Once the contractual relationship has been terminated, we will keep them blocked during the legal prescription periods which, in general, are 10 years due to the application of the regulations for the prevention of money laundering and financing of terrorism.
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HOW CAN I EXERCISE MY RIGHTS?

To exercise any of your rights, you may do so by sending an express request, through the following means:

1. E-Mail: lopd@flygrancanaria.com
2. Mail: To the Data Protection Officer: c/ Madrid, 4- 35130 de Mogán.
3. Or in person at the **FLY GRAN CANARIA** headquarters at the indicated address.

- 1.- Photocopy of the DNI (passport or other identity document) or electronic signature.
- 2.- Content of the request you make and if necessary, the documents that prove it.
- 3.- Address (for notification purposes), date and signature

If you exercise your rights by a specifically designated voluntary representative, you must provide the document or electronic instrument that proves the representation.

WHAT CAN I DO IF MY RIGHTS HAVE NOT BEEN ATTENDED TO?

If you consider that we have not satisfied your request, you can file a complaint with the Spanish Data Protection Agency in the section of its website:

<https://sedeagpd.gob.es/sede-electronica-web/vistas/formReclamacionDerechos/reclamacionDerechos.jsf>

FLY GRAN CANARIA informs that the exercise of the mentioned rights by a third party not legally authorized by the user, could suppose the commission of the crime of discovery and revelation of secrets foreseen by the second paragraph of the article 197 of the Penal Code, punished with imprisonment from one to four years and fine from twelve to twenty-four months; without prejudice of other consequences to which it would have to face as a result of any civil or administrative actions to which both the legitimate user, holder of the personal data, and **FLY GRAN CANARIA**, were entitled.

Similarly, the user may unsubscribe from any of the subscription services provided by clicking on the unsubscribe section of all emails sent by the provider.

In the same way, the provider has adopted all the technical and organizational measures necessary to guarantee the confidentiality, integrity and availability of the personal data that it deals with, as well as to avoid its loss, alteration and/or access by unauthorized third parties, as established in article 32 of the RGPD.

USE OF COOKIES AND THE ACTIVITY FILE

The provider on its own account or that of a third party contracted to provide measurement services, may use cookies when a user browses the website. Cookies are files sent to the browser by a web server in order to record the user's activities during their time on the site.

The cookies used by the website are only associated with an anonymous user and his/her computer, and do not themselves provide the user's personal data.

Through the use of cookies it is possible that the server where the website is located recognizes the web browser used by the user in order to make navigation easier, allowing, for example, access to users who have previously registered, access to areas, services, promotions or competitions reserved exclusively for them without having to register on each visit. They are also used to measure audience and traffic parameters, control progress and number of entries.

The user has the possibility of configuring their browser to be warned of the reception of cookies and to prevent their installation on their computer. Please consult your browser instructions and manuals for more information.

To use the website, it is not necessary that the user allows the installation of cookies sent by the website, or the third party acting on its behalf, without prejudice to the fact that it is necessary for the user to initiate a session as such in each of the services whose provision requires prior registration or "login".

The cookies used on this website are, in any case, temporary in nature with the sole purpose of making their subsequent transmission more efficient. Under no circumstances will cookies be used to collect personal information.

IP ADDRESSES

The website's servers will be able to automatically detect the IP address and domain name used by the user. An IP address is a number that is automatically assigned to a computer when it connects to the Internet. All this information is recorded in a duly registered server activity file that allows the subsequent processing of the data in

order to obtain only statistical measurements that make it possible to know the number of page impressions, the number of visits made to the web services, the order of visits, the point of access, etc.

SECURITY

The website uses generally accepted information security techniques in the industry, such as firewalls, access control procedures and cryptographic mechanisms, all with the aim of preventing unauthorized access to data. To achieve these purposes, the user/client agrees that the provider will obtain data for the purposes of the corresponding access control authentication.

That in accordance with the provisions of existing regulations on personal data protection, the LIABILITY is complying with all the provisions of the regulations GDPR and LOPDGDD for the processing of personal data under its responsibility, and clearly with the principles described in Article 5 of the GDPR, by which they are treated in a lawful, fair and transparent in relation to the person concerned and appropriate, relevant and limited to what is necessary in relation to the purposes for which they are treated.

The RESPONSIBLE person guarantees that he/she has implemented appropriate technical and organizational policies to apply the security measures established by the GDPR and the LOPDGDD in order to protect the rights and freedoms of the USERS and has communicated to them the appropriate information so that they can exercise them.

RECOMMENDATIONS ON THE USE OF THE INTERNET

FLY GRAN CANARIA reminds the user that the Internet is not always as safe as we would like it to be, so he or she must take the necessary and appropriate technical measures in order to avoid the unauthorized processing of his or her data.

Whenever you provide personal information on the Internet through e-mail, newsgroups, discussion forums, etc., keep in mind that such information may be collected and processed for purposes not desired by you, so **FLY GRAN CANARIA** recommends users to inform themselves about the confidentiality and privacy policies of the online sites they visit.

Keep in mind that unless you use encryption mechanisms, email on the Internet is not secure. Mail messages and discussion forums may be subject to forgery and impersonation, which should be taken into account whenever they are used. If you do not want to publish your e-mail address, configure your browser so that it does not leave your e-mail address on the web servers you access.

When surfing the Internet, be aware that the web servers you visit may record both the pages you access and the frequency and topics or subjects you search for, even if they do not inform you about it. If you do not wish to record your activities, use servers that preserve your anonymity.

Use the latest versions of browser programs whenever possible, as they tend to incorporate better security measures. Consider activating the options that alert you to the exchange of unwanted data in these programs.

Use the security mechanisms available to you (secure web servers, cryptography, digital signature, etc.) to protect the confidentiality and integrity of your data to the extent necessary.

This document contains the privacy policy of www.flygrancanaria.com and its social network site Facebook, Twitter and Instagram. This version has been updated to 01/07/2020.