

DATA PROTECTION

In accordance with the provisions of Article 5 of the Organic Law 15/1999 of December on the Protection of Personal Data, which regulates the right to information in the collection of data, we inform you of the following points:

- The personal data that you have given us in this and other communications maintained with you will be processed in the files under the responsibility of Bacco Properties Mallorca.
- The purpose of the treatment is to properly manage the provision of the service you have requested. Likewise, these data will not be transferred to third parties, except for legally permitted assignments.
- The data requested through this and other communications are mandatory supply for the provision of the service. These are adequate, relevant and not excessive.
- Your refusal to provide the information requested implies the impossibility of providing the service.
- Likewise, we inform you of the possibility of exercising the corresponding rights of access, rectification, cancellation and opposition in accordance with the provisions of Law 15/1999 before Bacco Properties Mallorca as responsible for the file. The mentioned rights can be exercised through the following means: info@baccoproperties.com, Bacco Properties Mallorca, Carrer de la Pols 18,1a, 07003 Palma. Mallorca. Balearics. Spain.

The General Privacy Policy provides information on the collection, use, sharing and processing of personal information by Bacco Properties Mallorca in connection with your use of Bacco Properties Mallorca websites, mobile applications, and social media pages that link to this Privacy Policy, your interactions with Bacco Properties Mallorca during in-person meetings or at Bacco Properties Mallorca events, and in the context of other offline sales and marketing activities. This Privacy Policy also explains the choices you have in relation to these processing activities.

This Privacy Policy was last updated on May 25, 2018. However, the Privacy Policy can change over time, for example to comply with legal requirements or to meet changing business needs. In case there is an important change that we want to highlight to you, we will also inform you in another appropriate way (for example via an email to all our subscribed clients).

As used in this Privacy Policy, 'personal information' or 'personal data' means information that relates to an identified individual or to an identifiable individual. For example, this could include among other things your name, address, email address, business contact details, or information gathered through your interactions with us via our websites or at events. Personal information is also referred to as 'information about you.' For more detail about the types of information about you that we may process, please refer to Section 4 below.

SCOPE OF THE PRIVACY POLICY

This Privacy Policy applies to the processing of personal information by Bacco Properties Mallorca of:

- visitors and users of the Bacco Properties Mallorca website, computer or mobile software applications and our social media pages that link to this Privacy Policy (collectively referred to as the sites);
- attendees of Bacco Properties Mallorca events,
- customers and prospective customers and their representatives;
- subscribers to Bacco Properties Mallorca newsletter;
- suppliers and business partners and their representatives.

When interacting with our websites, you also have the ability to link or connect with non-Bacco Properties Mallorca websites, services, social networks, applications or other features. Enabling these features will lead to other parties than Bacco Properties Mallorca processing information about you. Bacco Properties Mallorca does not have any control over these features of other parties. We encourage you to review the privacy policies of these parties before using these features.

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL INFORMATION?

Bacco Properties Mallorca is responsible for processing your personal information described in this Privacy Policy.

WHICH TYPES OF PERSONAL INFORMATION DO WE PROCESS?

Bacco Properties Mallorca can process information about you collected both offline and online.

- Offline information about you originates from our interactions with you during in-person meetings or at Bacco Properties Mallorca, conferences, workshops or gatherings;
- Online information about you originates from your activities on our sites, for example, in relation with your Bacco Properties Mallorca accounts, (pre-)sales inquiries or subscription to our newsletter, or from your interactions with Bacco Properties Mallorca via electronic communication tools such as email or telephone. Information about you may also be provided by third party sources, such as data aggregators who may not have a relationship with you.

Online information about you may also originate from the use of cookies and similar technologies (for example, pixel tags and device identifiers) on our sites or sites of third parties. For more information on cookies and similar technologies, please see Section 11 below.

Information about you that Bacco Properties Mallorca may be collect and process includes:

- name and physical address, email addresses, and telephone numbers;
- demographic attributes, when tied to personal information that identifies you;
- photographs and testimonials;
- transactional data, financial details and payment methods;
- company data such as the name, size and location of the company you work for and your role within the company;
- data from surveys and publicly available information, such as social media posts;
- unique IDs such as your mobile device identifier or cookie ID on your browser;
- IP address and information that may be derived from IP address, such as geographic location;
- information about a device you use, such as browser, device type, operating system, the presence or use of "apps", screen resolution, and the preferred language;
- behavioral data of the internet connected computer or device you use when interacting with the sites, such as advertisements clicked or viewed, sites and content areas, date and time of activities or the web search used to locate and navigate to a site.

Please note that Bacco Properties Mallorca does not control the content that you may post to Bacco Properties Mallorca Communities forums or social networks; in some cases, such content may be publicly available on the Internet. You should carefully consider whether you wish to submit personal information to these forums or social networks and whether you wish to make your profile available to other users, and you should tailor any content you may submit accordingly.

WHY AND HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use personal information for the following purposes:

- to communicate and respond to your requests and inquiries to Bacco Properties Mallorca;
- to deliver functionality on our sites and for their technical and functional management;
- to administer subscriptions of Bacco Properties Mallorca newsletter;
- to market our products and services or related products and services, and to tailor our marketing and sales activities to your or your interests;
- to engage in transactions with customers, suppliers and business partners and to process orders for Bacco Properties Mallorca services;
- to analyse, develop, improve and optimize the use, function and performance of our sites and services;
- to manage the security of our sites, networks and systems;
- to comply with applicable laws and regulations and to operate our business;

These purposes are described below in further detail.

To communicate and respond to your requests and inquiries to Bacco Properties Mallorca

If you get in touch with us (such as by submitting contact forms on our sites, attending Bacco Properties Mallorca events or other occasions, sending an email or by visiting social media platforms), we process information about you to communicate with you and to respond to your requests or other inquiries. We

can also process personal information to interact with you on third party social networks.

To administer subscriptions of Bacco Properties Mallorca newsletter

If you subscribe to our newsletter, we process information about you to administer your subscription to our newsletter.

To market our services or related services and to tailor marketing and sales activities

Bacco Properties Mallorca may use information about you to notify you about new product releases and service developments, events, alerts, updates, prices, terms, special offers and associated campaigns and promotions (including via newsletters). We do our best to tailor your website visit, marketing experience and our communications to your expressed interests.

If you attend an event, Bacco Properties Mallorca may process information about you gathered in relation to the event. Bacco Properties Mallorca may also permit designated event partners or conference sponsors to send you up to two communications related to your event attendance. Please note that our partners or conference sponsors may directly request information about you at their conference booths or presentations, and their use of your information that you provide to them will be subject to their privacy policies.

We may also process your personal information to post testimonials on our sites, but will first obtain your consent to use your name and testimonial.

To engage in transactions with customers, suppliers and business partners and to process purchases of our products and services

If you place an order for our products and services, or if you provide services to Bacco Properties Mallorca, our employees, customers or partners as a supplier or business partner, Bacco Properties Mallorca processes information about you to engage in and administer the relevant transactions (such as by sending invoices and making payments), administer your order, and help you get started and adopt our products and services.

To analyse, develop, improve and optimize the use, function and performance of our sites and products and services

We may process personal information in order to analyse, develop, improve and optimize the use, function and performance of our sites and products and services, as well as marketing and sales campaigns. In case the sites permit you to participate in interactive discussions, create a profile, post comments, opportunities or other content, or communicate directly with another user or otherwise engage in networking activities, Bacco Properties Mallorca may process personal information when moderating these activities.

To manage the security of our sites, networks and systems

We may collect site use data for security and operations management to help keep our sites, networks and systems secure, or to investigate and prevent potential fraud, including ad fraud and cyber-attacks and to detect bots.

To comply with applicable laws and regulations and to operate our business

In some cases, we have to process personal information to comply with applicable laws and regulations. For example, to respond to a request from a regulator or to defend a legal claim. We may also process personal information in the performance and operation of our business, such as to conduct internal audits and investigations or for finance and accounting and archiving and insurance purposes.

WHAT IS OUR BASIS FOR PROCESSING INFORMATION ABOUT YOU?

For personal information collected about you in the EU, our basis for processing is the following:

- In order to communicate adequately with you and to respond to your requests, we need to process information about you and therefore have a legitimate interest in processing this information.
- In order to engage in transactions with customers, suppliers and business partners, we need to process information about you as necessary to enter into or perform a contract with you.
- We process personal information for marketing and sales activities based on your consent where so indicated on our sites at the time your personal information was collected, or further to our legitimate interest to market and promote our products and services.
- We rely on our legitimate interest to analyse, develop, improve and optimize our sites, products and services, and to maintain the security of our sites, networks and systems.
- In order to comply with applicable laws and regulations, or to process an opt-out request.

FOR WHAT PERIOD DO WE RETAIN PERSONAL INFORMATION

Bacco Properties Mallorca maintains personal information for the following retention periods:

- Information about you we collect to engage in transactions with our customers, suppliers and business partners, and to process purchases of our products and services, will be retained for the duration of the transaction or services period, or longer as necessary for record retention and legal compliance purposes.
- If you have registered for our newsletters and blogs, your subscription data will be retained for as long as you are subscribed to our distribution lists. Bacco Properties Mallorca retains records of that deletion for 30 days.
- Contact information such as your email address or phone number collected online on our sites or offline from our interactions with you at Bacco Properties Mallorca events and conferences, and used for direct marketing and sales activities will be retained for as long as we have an active (customer) relationship with you. We treat you as an active contact if (i) you have interacted with Bacco Properties Mallorca or updated your

contact details and preferences in the past 18 months; and (ii) you have not made a deletion request.

- Personal information needed to retain your opt-out preferences is retained for 20 years (or longer as necessary to comply with applicable law).

WHEN AND HOW CAN WE SHARE YOUR PERSONAL INFORMATION?

Sharing within Bacco Properties Mallorca

Bacco Properties Mallorca employees are authorised to access personal information only to the extent necessary to serve the applicable purpose(s) and to perform their job functions.

Sharing with third parties.

We do not share personal information with third parties.

HOW IS YOUR PERSONAL INFORMATION SECURED?

Bacco Properties Mallorca has implemented appropriate technical, physical and organisational measures designed to protect personal information against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access, as well as all other forms of unlawful processing.

WHAT COOKIES AND SIMILAR TECHNOLOGIES DO WE USE ON OUR SITES?

Cookies and similar technologies (e.g., pixels tags and device identifiers) are used by Bacco Properties Mallorca and our advertising technology partners to recognize you and/or your device(s) on, off and across different services and devices for the purposes specified in Section 5 above.

- When do we use cookies and similar technologies?

Cookies are small text files that contain a string of characters and uniquely identify a browser on a device connected to the Internet. Any browser visiting our sites will receive cookies from us. We use cookies and other technologies on

all our sites to ensure the best possible and secure experience on our sites and to provide you with tailored information on products and services. Bacco Properties Mallorca also uses cookies or similar technologies on its sites to collect online information as well as behavioural data of your device usage on our sites (e.g. pages viewed, links clicked, documents downloaded). This information contributes to Bacco Properties Mallorca Marketing services designed to provide targeted digital advertising and personalisation services to Bacco Properties Mallorca customers.

- Which types of cookie are used by Bacco Properties Mallorca?

Please click [here](#) for more information on the types of cookies used by Bacco Properties Mallorca.

- How can I manage my cookie preferences?

If you do not want to receive cookies, you can also change your browser settings on your computer or other device you are using to access our services. Most browsers also provide functionality that lets you review and erase cookies, including Bacco Properties Mallorca cookies.

WHAT ARE YOUR CHOICES?

We provide multiple choices in respect of the information we process about you:

- Opt-out of our use of your personal information You may withdraw consent you have previously provided for the processing of information about you, including for email marketing by Bacco Properties Mallorca.
- Delete personal information You can ask us to erase or delete all or some of the information about you.
- Change or correct personal information You can edit some of the information about you by. You can also ask us to change, update or fix information about you in certain cases, particularly if it is inaccurate.
- Object to, or limit or restrict use of personal information You can ask us to stop using all or some of the information about you (for example, if we have no legal right to keep using it) or to limit our use of it (for example, if the information about you is inaccurate).

- Right to access and/or have your information provided to you You can also ask us for a copy of information about you and can ask for a copy of information about you provided in machine readable form if you reside in the EU or other country that provides you this right as a matter of law.

You can exercise these choices in accordance with applicable laws as specified on our Privacy Choices page, or by filling out our inquiry form.

HOW TO CONTACT BACCO PROPERTIES MALLORCA IF YOU HAVE QUESTIONS, COMMENTS OR COMPLAINTS?

If you believe your personal information has been used in a way that is not consistent with the Privacy Policy or your choices, or if you have further questions, comments or suggestions related to this Privacy Policy, please contact us

Written inquiries may be addressed to:

Natalia Fuentes Johansson

Carrer de la Pols 18, 1a, 07003 Palma de Mallorca, Spain.

Tel: + 34 685231141

Email: info@baccoproperties.com

DISPUTE RESOLUTION OR FILING A COMPLAINT

If you have any complaints regarding our compliance with this Privacy Policy, please contact us first. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with this Privacy Policy and in accordance with applicable law.

You also have the right to file a complaint with a competent data protection authority if you are a resident of a European Union member state.

BACCO PROPERTIES MALLORCA OFFICE:

Bacco Properties Mallorca corporate headquarters is located at:

Carrer de la Pols 18,1a, 07003 Palma de Mallorca, Spain.

Tel: + 34 685231141

Email: info@baccoproperties.com