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PRIVACY POLICY

Lock Up Smart Doors S.L. (hereinafter Lock Up) hereby informs you of its privacy policy applied to personal data. Thus, all personal data under its responsibility will be processed in accordance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and LO 3/2018 on the protection of personal data, and the appropriate security and confidentiality measures will be maintained for them. Users who provide personal data clearly, accurately, and unequivocally consent to these terms and conditions.

This privacy policy applies to the website www.operto.com (website) and the STAYmyway mobile application (APP).

The APP consists of an access, control, and management system for accommodation services. The accommodation facility adhering to our network accesses our system to facilitate your online check-in, allow you to use the application as a virtual key, and provide access to all services offered by the accommodation.

WHO IS THE DATA CONTROLLER AND PROCESSOR OF YOUR DATA?

- DATA CONTROLLER: The Data Controller is the Accommodation facility where you will be checking in through our APP.
- DATA PROCESSOR of your data is: Lock Up Smart Doors S.L.
- Tax ID (CIF): B73849275
- Postal Address: Torre Dimóvil Avda. Juan Carlos I. 59 4 Planta., 30100, Murcia, Murcia
- Email: data.privacy@staymyway.com

WHAT TYPE OF DATA DO WE PROCESS?

We only process the data established by current regulations. Specifically, you will need to provide us with the following data for identification: Name and surname(s), Gender, ID document number, document support number, document type (DNI, Passport, TIE), Nationality, date of birth, full Address, telephone number, and email.

Copy of ID with your image (Selfie) to verify the accuracy of the data you provided during registration.

Use of the APP:

For the normal functioning of the APP, the following permissions are necessary and require user confirmation the first time they are needed:



- iOS:

- Camera: Required to capture images of the user's documentation and their selfie.
- Notifications: Required to notify the user in real-time about any changes to their booking, information on the check-in process, communication from the host, or any other type of notification.

- Android:

- Storage: Required to save and read the images of the user's documentation, selfie, and signature.
- Camera: Required to capture images of the user's documentation and their selfie.
- Location: Required to scan Bluetooth® devices.

To deactivate any of these permissions, the following must be done:

- iOS:

- Settings → Apps → Staymyway
- From the displayed list, deactivate the ones required.

- Android:

- Settings → Applications → Staymyway → Permissions.
- From the displayed list, deactivate the ones required.

FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

We process your data in order to accurately identify all individuals over 14 years of age and to provide you with the virtual key via Bluetooth.

Your data will also be used to track your stay at the hotel.

WHAT IS THE LEGAL BASIS FOR THE PROCESSING OF YOUR DATA?

The legal basis that allows us to process your personal data is a ****legal obligation****, to comply with Royal Decree 933/2021, of October 26, which establishes the obligations for documentary registration and information of natural or legal persons engaged in accommodation and motor vehicle rental activities.

HOW LONG WILL WE RETAIN YOUR DATA?

In cases where Lock Up Smart Doors S.L. is responsible for communicating the data to the police, the data will be retained for 3 years. If the accommodation facility is responsible for the



communication, Lock Up will retain the data for the period established by the accommodation, and never for more than 3 years.

After the mentioned periods, they will be anonymized, retaining only the country of origin, age, and gender, for statistical purposes of the APP.

Regarding the copy of your identification document and selfie, **these will be deleted immediately** once the accuracy of the identification data you have provided has been verified and successfully communicated to the relevant traveller registration authorities, and will be deleted in any case upon completion of the stay for which you provided them to us.

WILL WE SHARE YOUR DATA WITH THIRD PARTIES?

Personal data will be disclosed to:

- The accommodation facility where you will be checking in.
- Law enforcement agencies in the performance of their duties in the prevention, detection, and investigation of crimes.

Technology services we work with:

- CheKin Soluciones Digitales, S.L. provides us with services to correctly collect the information, verify identity, and make the communication to the relevant authority.

WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

We are committed to respecting the confidentiality of your personal data and guaranteeing the exercise of your rights.

You can exercise them at no cost by sending us an email to our address data.privacy@staymyway.com, simply indicating the reason for your request and the right you wish to exercise. Upon receiving your request, it will be communicated to the Accommodation facilities responsible for processing.

You have the right to:

- Ask us for **access** to the data we hold about you.
- Ask us to **rectify** the data we already hold. Please note that by actively providing us with your personal data through any means, you guarantee that they are true and accurate, and you undertake to notify us of any changes or modifications to them.
- Ask us to **erase** your data to the extent that they are no longer necessary for the purpose for which we need to process them, as we have informed you previously, or when we no longer have a legal basis to do so.



- Ask us to **restrict the processing** of your data, which means that in certain cases you can ask us to temporarily suspend the processing of the data or to retain them beyond the necessary time if you may need them. If you have given us your consent to process your data for any purpose, you also have the right to **withdraw** it at any time.
- **Receive** the personal data concerning you that you have provided to us, in a structured, commonly used, and machine-readable format, and to **transmit** them to another controller.

Furthermore, when the processing of your data is based on our legitimate interest, you also have the right to object to the processing of your data.

Finally, we inform you of your right to lodge a complaint with the relevant data protection supervisory authority, in particular, the Spanish Data Protection Agency <https://www.agpd.es/portalwebAGPD/index-ides-idphp.php>

CHANGES TO THE PRIVACY POLICY.

We may modify the information contained in this Privacy Policy when we deem it appropriate. Should we do so, we will notify you through various means via the Platform, so that you can review the changes, evaluate them, and, where appropriate, object or unsubscribe from any service or functionality.