

## **PRIVACY POLICY TENERIFE WINDSURF SOLUTION**

### **1 WHO WE ARE**

We are Folkerts Trading SLU known as Tenerife Windsurf Solution (mentioned as TWS in this document), based in El Medano Tenerife, Canarian Islands, Spain. Our formal address is Call Margarita 2, 38612 El Medano, Santa Cruz de Tenerife, Tenerife Spain.

### **2. THE TYPE OF PERSONAL DATA WE PROCESS**

2.1 General. We may collect and process the following categories of personal information:

a. Name, passport number and other identifying information

For example, we may record your name, title, gender and date of birth, your nationality, country of residence, level of the sport you are going to do, emergency telephone number and passport number.

b. Your contact details and personal account or registration details

Your contact details may include your address, telephone number and email address. When you create a booking or information request, or register for a service or product, we may also record your sign in details and other information you fill out on the information or registration form.

c. Information about your reservations, bookings and purchases

When you make a reservation, or book a stay with us, we process your reservation and booking information. This information may include details about your stay, prices and the date of your reservation or booking. In addition, we process information in relation to ancillary services and products you purchase (for example via the TWS webshop).

d. Our communication with you

When you send us an email or chat with us online or via social media, we register your communication with us. We also register your communication preferences. For example when you unsubscribe from one of our newsletters or when you choose to receive your booking related communication (such as confirmation, payment confirmation etcetra) via other channels than email (such as WhatsApp, Facebook Messenger or WeChat). When you call us, our customer support will register your questions or complaints in our database. We may also record telephone calls for training purposes or to prevent or combat fraud.

e. Information we collect when you use our websites, apps and other digital media

- When you visit our websites we may register your IP address, browser type, operating system, referring website, web-browsing behavior and app use. We also collect information via cookies and similar technologies when you visit our websites. For more information please read our cookie policy on the website
- We may receive an automatic notification when you open our emails or click on a link in such emails.
- With your permission, we may also receive your location data.

f. Information in relation to social media

Depending on your social network settings we may receive information from your social network provider. For example, when you sign in for our services using a social network account, we may receive your social network profile including your contact details, interests and contacts. For more information on the personal data that we receive from your social network provider and how to change your settings, please check the website and privacy policy of your social network provider.

g. Information you choose to share with us

You may choose to share information with us, for example when you share your interests and preferences with us, leave a comment for us on Facebook, fill out a customer survey or submit an entry for a contest.

2.2 Cookies and similar technologies. When you use our website or mobile apps we collect information via cookies and similar technologies. For more information please read our cookie policy on the website or mobile app you use.

2.3 Specific services, apps or events. For specific services, apps or events, we may collect other types of data and use such data for different purposes than described in this privacy policy. We will inform you about this when you register for the specific service, event or download.

### 3. HOW WE COLLECT YOUR DATA

3.1 We collect the aforementioned categories of personal data in the following ways:

a. We collect data you provide to us

When you book a stay with us, create an online account, register for one of our programs, contact our customer support, subscribe to receive our emails or mobile push notifications, register for one of our events or participate in a promotional contest.

b. We receive your personal data from your travel agent or other companies involved in facilitating your rental arrangements

We receive your data from these parties to handle your reservations and bookings and to fulfil your rental arrangements and purchases. For example, when you book a stay with us through a travel agent, we receive your identifying information and booking details from your travel agent. And if you use a third party platform to search and book a stay with us, we may receive those details from that provider.

c. When you use our website or mobile apps, we collect information via cookies and similar technologies

For more information please read our cookie policy on our websites or the mobile app you use.

d. Depending on your social network settings, we may receive information from your social network provider

Please see 'The types of personal data we process' above.

### 4. FOR WHICH PURPOSES WE USE YOUR DATA

#### 4.1 The main purposes for which we use your personal information are:

##### a. To provide our services to you

To handle your reservations and bookings and to fulfill your rental arrangements and purchases, we need to process most of the information described above. For example, we need your name, passport number and other identifying information to issue your booking. To confirm your booking and to inform you about changes, we need your contact details.

##### b. To facilitate our loyalty programs

To let you or your company benefit from the discounts and rewards under our loyalty programs, we use your general information, your booking information and your purchases.

##### c. For statistical research

- **General.** We use automatic tools to perform statistical research into general trends regarding the use of our services, loyalty programs, websites and social media and the behavior and preferences of our customers and users.
- **Categories of data.** To perform our research, we may use the categories of personal data described above, including your booking data (such as date of departure, date of arrival, origin and age), and personal details (gender, postal code). We combine this data with the data we collect with cookies and similar technologies when you visit our websites or use our services. And we merge it with (aggregated) data collected by third party providers using analytical or marketing cookies or similar technologies. For more information on cookies and similar technologies, please check the cookie policy on our website. We only use aggregated data for our analysis and do not use your name or e-mail address. Without your consent, we will not use special categories of data for this statistical research.
- **Examples.** We use your booking data and the ancillaries you purchase (upgrades, extra services) to improve our services and provide more relevant offers. For example, we use customer surveys to measure customer satisfaction and to understand what is important for our customers so we can improve our service. And we use cookies and similar technologies to evaluate how our website visitors navigate our website so we can make it more intuitive.
- **Legal basis.** We process your personal data for our legitimate interests to develop better services and offers for our customers, to improve our loyalty programs, to provide more responsive customer support and to improve the design and content of our websites.
- **Right to object.** You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data for statistical research (please see below 'Your rights').

##### d. To send you updates and special offers tailored to your interests

- **Communication.** When you book a stay with us, we send you personalized ads and special offers for sports related products and services in our booking related emails (unless you opt-out during the booking procedure). For example, before your stay we will send you an email to help you prepare for your stay. In this email we may include special offers for your stay. You may also subscribe to receive emails or mobile push notifications from us with updates and special offers tailored to your interest. For example, you can subscribe to the TWS newsletter which keeps you informed on attractive rental offers, latest gear, package deals and the latest news. With your consent, we may also send you emails on specific occasions,

such as a special offer on your birthday or personalized offers for your next stay with us within a few months after you return.

We may also use other communication channels to send you personalized ads and special offers, such as postal mail or, with your consent, social channels (such as Facebook Messenger, WhatsApp or WeChat).

- Categories of data. We use your contact details to communicate with you. To understand what is relevant to you, we use automatic tools to analyze your personal data. For this purpose, we may use the categories of personal data described above, including your booking data (such as date of departure, date of arrival, origin, number and age of people in the booking, gear rental) information about you (gender, zip code) and the interests and preferences you shared with us. We combine this data with data that we collect with cookies and similar technologies when you visit our websites or use our apps. And we merge it with (aggregated) data collected by third party providers using analytical or marketing cookies or similar technologies. For more information on cookies and similar technologies, please check the cookie policy on our website. Without your consent, we will not use special categories of data.

- Personalized offers. In our communication (see under above), we include personalized offers from TWS and our partners relating to our services and products. For example, we may include offers for package deals, windsurf gear offer (used and new gear), car or bike rental services and hotels offered by third parties. We tailor these offers to your interests. For example, with your consent we may send you an email after you return from a trip with offers based on your booking history to inspire you for your next trip. We may also share non-personalized information (destination, travel date and duration of the trip) with our partners so they can offer you with a relevant choice of accommodations, cars, tours and activities during your trip (please see 'Disclosing or sharing data with third parties' below). All communication is sent by TWS, alone or in combination with Apartments Medano, no contact details are shared with our partners for this purpose without your consent.

- Legal basis. We process your personal data as described in this paragraph for our legitimate interest and the interests of third parties to provide you with relevant updates and offers.

- Opt-in and opt-out, unsubscribe and right to object. We only send you emails with updates and special offers with your prior opt-in. You can opt-out from receiving booking related commercial emails during the booking procedure. You can unsubscribe from these booking related commercial emails and the emails with updates and special offers, any time by clicking the unsubscribe link in the email, by adjusting your communication preferences in your account (if available), by contacting us (please see 'Your Rights' below). When you unsubscribe, you will still receive our booking related emails (such as your booking confirmation and welcome mail). You may object to the use of your personal data for direct marketing purposes anytime (please see below 'Your rights').

e. For other direct marketing purposes

- General. This paragraph describes specific examples of our use of your data for other direct marketing purposes.

- Marketing cookies. Our websites use marketing cookies which are typically placed by advertising networks. These networks are companies which act as intermediaries between TWS and advertisers. These marketing cookies are amongst others used to show relevant, personalised advertisements or offers (based on your visit to and click behaviour on our

websites) when you visit those networks or connected websites. For more information on these marketing cookies and how you can withdraw your consent for these cookies, please check the cookie policy on our website or the mobile app you use.

- **Linked site behaviour.** If you log on to our website or if you visit our websites via a link in an email, we will link your site behaviour to your booking data on our data management platform. We mainly use this data to exclude you from further advertising once you have booked a stay with us. For example, when you search for rental gear on our main website, marketing cookies will be used to show you relevant advertisements (see previous paragraph). When you book a stay with us through one of our other websites (such as our corporate portal) or with one of our group companies, we will stop showing you further advertisements via marketing cookies based on your search behaviour on our main website.
- **Abandoned cart.** When you break off your booking procedure on our website, we will send you a personalized email with a link to your booking procedure so you can continue where you left off. We will only send you such email at your request or if you have agreed to receive updates and special offers from us by email. You can withdraw your consent for such emails anytime by clicking the unsubscribe link in the email, by adjusting your communication preferences in your account (if available) or by contacting us (please see 'Your Rights' below).
- **Custom audience targeting.** We may participate in Facebook's Custom Audience program, which enables us to display personalized ads on your timeline. For that purpose, we may share your email address with Facebook to enable Facebook to determine if you have a Facebook account. To determine our audience, we may use your booking data. Learn more about how Facebook uses your data for this purpose and how you can control how information about you is used by Facebook to personalize the ads you see. You can also check the Facebook privacy policy . We may also use similar programs from other social networks. You may opt-out for participation in our Facebook Custom Audience program and similar programs by sending us an email (please see 'Your Rights' below) from the email address you are opting out of. You may also have provided consent for receiving personalized ads on your Facebook timeline or as part of your use of other social networks via our cookie policy. Please check the cookie policy on our website how you can withdraw your consent.

**g. To communicate with you**

We use your contact details to communicate with you in relation to our services or to answer your questions or to handle your complaints.

**h. For record keeping and to comply with statutory obligations**

We collect, store and use your data for internal business purposes, such as record keeping and to comply with our legal and fiscal obligations.

We may be required by law to collect and share your identifying information and your booking and travel information with public authorities or governmental organizations for the purpose of border control, immigration, entering the territory of a State, security or combatting terrorism.

**4.2 Legal basis.** We collect, use and store your personal data to provide services and our loyalty program to you, to comply with the legal obligations we are subject to, if necessary for our legitimate interests or the interests of a third party or on the basis of your consent.

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent. For example, by clicking the unsubscribe link in the email, adjusting your communication preferences in your account (if available) or by changing your smart phone settings (for mobile push notifications and location data). You may also contact us to withdraw your consent (please see 'Your Rights' below).

If you refuse to provide personal data that we require for the performance of the contract or compliance with a legal obligation, we may not be able to provide all or parts of the services you have requested from us. When we process your personal data for our legitimate interests or the interests of a third party, we have balanced these interests against your legitimate interests. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. Our legitimate interests may for example include security and safety purposes or to provide better services and offers to you. For more information on these interests, please see the 'For which purposes we use your data' above. Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (please see 'Your Rights' below).

## 5. DISCLOSING OR SHARING DATA WITH THIRD PARTIES

5.1 General. We may disclose or share your personal data with our group companies, your travel agents, companies that participate in our loyalty program, service providers or subcontractors for the following purposes.

### a. To facilitate your bookings and travel arrangements

To handle your reservations and bookings and to fulfill your rental arrangements and purchases, we must share your personal data with our group companies and other companies involved in facilitating your rental arrangements. When you purchase our services through a travel agent or other third party, we also share your personal information data with these parties.

### b. For support services

We use third parties to provide our services, such as IT suppliers, social network providers, marketing agencies, credit and charge card companies and anti-fraud screening service providers. All such third parties will be required to adequately safeguard your personal data and only process it in accordance with our instructions. Our business activities are carried out (and business efficiencies are achieved) by processing or consolidating information (including personal data) in centralized databases and systems. These central databases and systems may be hosted or managed by one group company for other group companies.

### c. Statistical research and direct marketing

We may share your personal data with third parties for statistical research and direct marketing. Please see above 'Statistical research', 'To send you updates and special offers tailored to your interests' and 'Other direct marketing purposes' for more information.

### d. To let you benefit from the services of our partners

With your consent, we may share your information with our partners to let you benefit from the services of these partners that we integrate or offer in our own services. For example,

we may share non-personalized information (travel date and duration of the trip) with a hotel booking platform so it can provide you with an offer for a hotel tailored to your trip. Although we select our partners with care, these partners have their own privacy policies that apply to the way they use your personal data.

e. To secure order and safety during your stay

5.2 Public authorities. We may also be required by law to collect and share your identifying information and your booking and travel information with public authorities or governmental organizations for the purpose of border control, immigration, entering the territory of a State, security or combatting terrorism.

5.3 Third party websites. Our websites contain links to third-party websites. If you follow these links, you will exit our websites. This privacy policy does not apply to websites of third parties. TWS cannot accept liability for the use of your personal data by these third parties. Your use of these websites is at your own risk. For more information on how these third parties treat your personal information, please check their privacy policy (if available).

## 6. SECURITY AND RETENTION

6.1 TWS will take appropriate technical and organizational measures to protect your personal data against loss or unlawful use.

6.2 Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

## 7. YOUR RIGHTS

7.1 You may contact us (please see below) to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing.

### 1. Right to access

You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.

### 2. Right to rectification

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.

### 3. Right to erasure

You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.

#### 4. Right to restriction of processing

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.

#### 5. Right to data portability

Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.

#### 6. Right to object.

You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see 'Legal basis' above).

At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.

#### 7.2 You may withdraw your consent at any time

You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent. For example, you may withdraw consent, by clicking the unsubscribe link in the email, adjusting your communication preferences in your account (if available) or by changing your smart phone settings (for mobile push notifications and location data).

You may also contact us.

7.3 For more information on how you can withdraw your consent for cookies and similar technologies we use when you visit our websites or use our apps, please check the cookie policy on our website or in the app. There may be situations where we are entitled to deny or restrict your rights as described above. In any case, we will carefully assess whether such an exemption applies and inform you accordingly. + We may, for example, deny your



request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply in case the personal data was not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.

7.4 When you would like to exercise your rights, all you have to do is send your request to:  
Tenerife Windsurf Solution  
Calle Margartia 2  
38612 El Medano  
Santa Cruz de Tenerife  
Email: [info@tws-windsurf.com](mailto:info@tws-windsurf.com)

7.5 You can also contact us at if you have any questions, remarks or complaints in relation to this privacy policy.

## 8. HOW WE LOOK AFTER THIS POLICY

8.1 This privacy policy was most recently amended on 24 May 2018 and replaces earlier versions. We may amend this privacy policy from time to time and will notify you of any changes prior to these changes taking effect.