

Luxury Properties Spain

PRIVATE POLICY AND DATA PROTECTION

Last update : February 2020

It is normal to place special emphasis on how your data is obtained and used.

This personal data protection policy (the “**Policy**”) has been created to help you understand the practices and conditions in which Luxury Properties Spain, respectively Acheter sur la Costa Blanca, having its office at Avenida de Fontilles 21, Pego, Spain (“**LPS**”) gathers, uses and stores your personal data (the “**Data**”).

In this document you will find the various Data that we may collect or that you may provide to us when you access and/or use:

- the website <https://www.luxury-properties-spain.com> (the “**Website**”) on which properties and plots are offered for sale (the “**Properties**”) identified as such on the Website.

Given that laws and regulations on technology and personal data protection are constantly evolving, this Policy will likely be updated.

If you are a user of the Website, you will be notified of any changes by email.

If any of the clauses in this Policy should be declared null and void or contrary to regulations, that clause will be deemed nugatory, however this will not result in any other clauses in this Policy becoming null and void.

This Policy applies to Data collected:

- on the Website,
- from your communication with LPS via email or other type of electronic messaging service,
- from your communication with LPS by phone,

It does not apply to information collected via applications and content (including advertisements) redirecting users to the Website.

Please read the Policy carefully to clearly understand our practices regarding the processing of your Data. Please be aware that you must agree to this Policy in order to view and/or use our Website.

If you do not agree, please do not use our Website.

You are responsible for ensuring any Data provided to LPS is complete, correct and up to date.

1. WHAT DATA DOES LPS COLLECT?

Depending on the nature and purpose of your interaction with LPS (completing contact forms and/or speaking with us by phone), we may collect the following Data:

- **your email** must be provided if you wish to communicate with LPS thanks to the contact forms;
- **data relating to your identity**, such as your firstname, name, phone number, email and address may be required according to your request when you contact us;
- **data relating to browsing**: data relating to how you use the Website, including IP address, browser used, browsing duration, search history, operating system used, language and pages viewed;
- **data about your visits to our Website**, including traffic data, logfiles and other data or communication resources used by you when accessing our Website;
- **data about social network** use when you use those features.

2. HOW IS MY DATA COLLECTED?

The Data collected and how it is collected depend on your use of the Website.

LPS **directly** collects Data that you enter into contact and/or communicated when you contact us by phone.

LPS also **indirectly** collects your Data through cookies and tracers.

Please read our Cookies Policy which has been created to help you better understand this technology and how we use it on our Website.

3. WHY IS MY DATA COLLECTED?

If you are a simple user, we collect your Data in order to :

- enabling you to use interactive features of the Website;
- manage your requests communicated by phone or email;
- notify the changes on our Website or in our offering of Properties and services.

Your Data may also be collected via cookies and tracers, with your consent when required, for:

- improving your user experience, namely by enabling our Website to recognise your equipment, saving you from having to provide the same information several times to perform the same task;
- analysing Website traffic and data to measure the number of users and subsequently make the Website easier to use.

The refusal to provide some Data could lead to the unavailability of certain services.

The Website may contain links to various websites and social network platforms managed on third party servers by people and organisations over which LPS has no control.

As such, we cannot under any circumstances be held liable for the way in which your Data is stored or used on those third party servers.

We recommend that you read the applicable policy regarding personal data protection for each third party website you access via our Website in order to understand how your Data will be used.

5. HOW LONG IS MY DATA STORED FOR?

LPS only stores your Data for the period necessary for the purposes explained in Article 3.

This storage period varies according to the Data in question, as it may be affected by the nature and purpose of the collection. Similarly, certain legal obligations stipulate a specific storage period.

When you contact us through the contact forms, when you communicate with us by phone, your Data will be stored up to five (5) years from the date of the last contact.

Lastly, Data collected using cookies/tracers will be stored for up to one (1) month for cookies, six (6) months for tracers measuring our Website's audience and up to thirteen (13) months for others.

Beyond the aforementioned durations, your Data will be anonymised in order to be stored for statistic purposes.

6. HOW IS MY DATA PROTECTED?

Your Data is stored on secure servers protected by firewalls and antivirus software.

We have implemented technical and organisational measures intended to protect the security and confidentiality of your Data against any accidental loss and any unauthorised access, use, modification or disclosure.

Given the inherent characteristics of the Internet, we cannot guarantee the optimal security of information exchanged over this network.

We strive to protect your Data but cannot guarantee the absolute security of information sent to our Website. You agree that you provide your Data at your own risk.

We cannot be held liable for any failure to comply with privacy settings and security measures implemented on our Website. As such, you agree that the security of your information is equally your responsibility.

7. WHAT ARE MY RIGHTS?

Vous pouvez choisir comment les Données que vous nous transmettez sont utilisées :

- You can browse the Website without providing Data. This means you will be unable to use certain Website features in particular « Favorites » et « Compare ».

- You can decide not to provide your email to be contacted. In this case, please note that we will not be able to write you and that you will be able to contact us only by telephone.

In accordance with the provisions of the applicable regulations regarding Data protection, namely the European General Data Protection Regulation 2016/679 (GDPR) and the French Data Protection Act no. 78-17 of 6 January 1978 and its amendments, you have the right to access and correct your Data.

You also have the right to stipulate directives relating to the fate of your Data in the event of your death.

Furthermore, subject to the conditions of the aforementioned regulation for exercising your rights, you have:

- The right to erasure of your Data.
- The right to limit processing of your Data .
- The right to object to the processing of your Data on legitimate grounds, in accordance with article 21 of the GDPR.
- The right to portability for the Data you have provided.
- The right to withdraw consent, when it has been asked.

When processing of your Data has occurred based on your consent, you may withdraw that consent at any time.

However, you acknowledge that any processing that occurred before your consent was withdrawn remains entirely valid.

You also have the right to object, without providing a reason, to LPS profiling you based on your Data, when content or communications are sent for commercial solicitation.

However, in accordance with Article 12.6 of the GDPR, when you exercise these rights, LPS, as the controller, reserves the right to require proof of your identity. Please be aware that the data required to prove your identity will be deleted once we have responded to your request.

You can exercise your rights by sending an email in French, English or Spanish to

- nicolas@acb.immo
- or writing to:

Acheter sur la Costa Blanca
Luxury Properties Spain
Avenida de Fontilles 21
03780 Pego
Spain

We are required to reply within one (1) month to all requests regarding the exercising of these rights. This timeframe may be extended to two (2) months for complex requests and large request volumes.

8. WHERE YOUR DATA IS STORED AND PROCESSED ?

The Website and the collected Data are hosted by Infomaniak, Rue Eugène-Marziano 25, 1227 Carouge, Geneva, Switzerland - whose servers are located in Switzerland. The collected Data are processed by LPS in Spain - Avenida de Fontilles 21, Pego.

By using the Website, you agree to your Data being stored to those servers and processed by LPS.