

## Privacy Notice & Cookie Policy

Urban Valley Resort & Spa is devoted to preserving your personal information and respects your privacy. This privacy notice describes how we gather and use your personal information. This includes any time you, or someone on your behalf, makes a booking, requests information from us, contacts us (or we contact you), uses our website, links from our website, connects with us via social media, through calling our hotel, or any other interaction we have with you (regardless of where you are based). It also explains your privacy rights and how the law safeguards you.

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### 1. GENERAL INFORMATION AND WHO WE ARE

#### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice explains how Urban Valley Resort & Spa collects and handles your personal data in our interactions with you, such as when we offer you with lodging and other services, as well as any data you submit through our website, including through cookies.

This general privacy notice may be supplemented by various special notifications that we may publish on certain occasions when we collect or handle personal data about you, so that you are fully informed of how and why we are using your information. This privacy notice is designed to enhance, not replace, our previous special notifications.

#### CONTROLLER

Urban Valley Resort & Spa is operated by High End Properties Ltd. This privacy notice is issued on behalf of Urban Valley Resort & Spa so when we mention "Urban Valley Resort & Spa", "we", "us" or "our" in this privacy notice, we are referring to High End Properties Ltd. High End Properties Ltd. is responsible for processing and controlling your data.

Please contact us using the information below if you have any concerns regarding this privacy notice, including any requests to exercise your legal rights.

## **CONTACT DETAILS**

Email address: [info@urbanvalleyresort.com](mailto:info@urbanvalleyresort.com)

Postal address: Triq Wied Ghollieqa, Kappara, SGN4437, Malta

Telephone number: +356 21385926

You have the right to file a complaint with the data protection body that oversees us at any time, Information and Data Protection Commissioner (Office of the Information and Data Protection Commissioner, Floor 2, Airways House, Triq Il - Kbira, Tas-Sliema SLM 1549, Malta <https://idpc.org.mt>). However, we would welcome the opportunity to address any issues before approaching the Authority, so please contact us first.

## **PLEASE LET US KNOW IF ANYTHING HAS CHANGED**

It is critical that the personal information we have about you is correct and up to date. If your personal information changes throughout your engagement with us, please let us know.

## **THIRD-PARTY LINKS**

Links to third-party websites, plug-ins, and apps may be found on our website. Third parties may collect or share data about you if you click on those links or enable those connections. We have no control over these third-party websites or the data they collect. We urge you to read the privacy notices of any third-party website you visit after leaving our website.

## **2. THE INFORMATION WE COLLECT ABOUT YOU**

Any information about a person that may be used to identify that person is referred to as personal data or personal information. It excludes data that has been anonymized (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity information, such as: title, gender, first name, middle name, last name, date of birth, place of birth, passport or ID card number, nationality, and car plate number.

Contact information, such as: billing address, home address, email address and telephone numbers.

Special requirements information, such as: health, disability, and dietary preferences.

Booking and transaction information, such as: arrival and departure dates, booking source, bank account or payment card details, payments details, purpose of stay, other bookings details, accommodation and other services purchased from Hotel, comments and responses to surveys provided by the guest regarding services of the Hotel.

Technical Information of your Visit to this Website includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data includes information about how you use our services or link with us via social media and our website.

We will not collect all the data referred to above in each case, but only such data required for the specific Legal Ground.

As a rule, we will only collect Special Categories of Personal Data about you (such as details about your dietary preferences, health needs and disabilities) to the extent that it is voluntarily provided by you or on your behalf and is required to meet your needs during your stay with us or other use of our facilities or services ("Special Requirements Data"). During your stay or other usage of our facilities, we may need to process such information in the case of an accident, a medical or other emergency.

We obtain limited information about children who are booked in to stay at our hotel - name, ID or passport number, date of birth.

### **IF YOU DO NOT PROVIDE PERSONAL INFORMATION**

If we are required by law or the terms of a contract concluded with you to collect personal data and you fail to submit that data when requested, we may be unable to execute the contract we have or are attempting to enter into with you (for example, to provide you with accommodation or our other services). In this scenario, we may need to cancel a booking or other service you've made with us, but we'll let you know right away if this is the case.

### **3. HOW WE COLLECT YOUR PERSONAL DATA**

We acquire data from and about you through a variety of techniques, including:

Direct contact. Filling out forms or communicating with us through post, phone, email, our website, social media, or other means allows you to provide us with your Identity, Contact, Booking, and Transaction Data. This includes any personal information you give us when you make a booking at our hotel, whether for overnight stays, functions or conferences;

- check in to our hotel;
- use the facilities our hotel for a function, conference, or other event;
- become a member of our newsletter and/or other publications;
- request that you be provided a brochure or other promotional or marketing materials;
- take part in a competition, reply to a campaign, or complete a survey or provide feedback.

Automation. We may collect Technical Data about your equipment, browsing actions, and habits whenever you engage with our website or via social media. Cookies, e-mails, server logs, and other similar technologies are used to acquire this personal data. For further information, please visit our Cookie Policy.

Travel agents or other third parties operating on your behalf or on behalf of your employer. If a booking is made for you by a travel agency, online portal, or another third party, such as a family member or traveling companion, or agent or other intermediary working for you, or, if you are traveling on business, your employer or another third party on your behalf, we may receive personal data about you (tour operators, online travel agencies, GDS, reservation systems, and similar, Contact, Booking, and Transaction Data from technical, payment, and delivery suppliers)

Other third parties or publicly accessible information. As detailed below, we may get personal data about you from third parties and public sources:

Web and social media analytics providers

Providers of web and social media analytics

Advertising networks

Web interaction technologies providers

Identity and contact information from publicly accessible sources such as EU member state trade registries Monitoring. Telephone calls may be monitored and/or recorded.

At all points of interaction, transactions and activities;

Traffic and activity on the web, social media, and apps

These are used to verify that we accurately carry out your instructions, for training and to enhance our services, as well as to ensure security and avoid fraud. We employ CCTV in and around our facilities for the safety of our visitors and patrons, as well as to prevent and detect crime. Please contact us if you would want more information about how we utilize CCTV.

Contacts for business. If you are an Urban Valley Resort & Spa business contact, we may collect information about you when you engage with our website, attend trade shows/workshops, meet with you in person, write with you through email and phone, and negotiate and sign contracts.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal information if there is a legal basis for us to do so. The following situations (each with a legal ground) are the most prevalent in which we will utilize your personal data:

Situations	Type of Data	Lawful Basis
Contractual Performance		In order to be able to deliver the reserved accommodations and services, or otherwise carry out the arrangement we have with you (or are about to enter into).
Consent		When you give us your express permission to process your data. Consent must be specific, freely given, informed and unambiguous and given on a voluntary basis.
Legitimate Interests		If it is essential to protect our (or a third party's) legitimate interests, and your interests and basic rights do not outweigh those interests.
Legal Compliance		If we must adhere to a legal or regulatory requirement.
Vital Interests		In the case of an accident or a medical or another related emergency, to protect your or another individual's vital interests, where you or they are physically or legally incapable of giving consent.

You have the right to withdraw your permission to any processing that is based on your consent (which mostly applies to online advertising to you) at any time by contacting us.

## PURPOSE OF OUR USE OF YOUR PERSONAL INFORMATION

We gather and process your personal data for a variety of reasons, including:

Purpose	Details
Manage our relationship with you	To make a reservation, to provide accommodation and other services to you, including meeting your specific health, disability and dietary requirements, to manage your stay at the hotel and monitor the use of our services, and to collect and recover money owed to us.
Legal Justifications	<ul style="list-style-type: none"> <li>- Performance of contract (where website is used to book or deliver service or manage membership).</li> <li>- Consent (to fulfill your unique health, handicap and nutritional needs, for the use of cookies and analytics, to develop our business and do marketing).</li> <li>- Legitimate Interest (to improve our services, to expand our business and advertise ourselves and for the use of cookies and analytics).</li> <li>- Interests of Critical Importance</li> <li>- Fulfill your responsibilities.</li> </ul>
Deal with Issues	<p>To deal with issues, complaints or disputes arising out of our relationship with you, and to prevent or detect crime, including fraud, to manage our relationship with you which will include, but not limited to:</p> <ul style="list-style-type: none"> <li>- Notifying you about changes to our terms or privacy policy;</li> <li>- Asking you to leave a review or take a survey, or participate in a prize draw or competition;</li> <li>- To improve our service to you.</li> </ul>
Protect Our Business	To administer and protect our business, including our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and data hosting), to provide you with relevant website content and advertisements, and to measure or understand the effectiveness of the advertising we serve you, and to offer comments and recommendations regarding our services that you might find useful.
Enhancing our Services	To enhance our website, services, marketing, customer connections, and experiences using data analytics.
Maltese Law	Complying with local regulations (for example, storing of accounting documents or registration cards)
Accidents	To cope with an accident, a medical emergency, or any other type of emergency

We do not make automatic decisions based on your personal information.

We may process personal information for more than one legal ground, depending upon the purpose for which we are using your data.

## **PROMOTIONAL AND MARKETING OFFERS**

We aim to provide you choices about how your personal data is used, especially in marketing and advertising.

We may use your Identity, Contact, Technical, Usage, and Membership other Profile Data to build a perspective on what we believe you might want or need, or what would be of interest to you, if you have consented to receive it and granted your consent. This is how we determine which services and offers are most likely to be of interest to you.

You can cancel your permission and unsubscribe from our marketing communications at any time by clicking the unsubscribe link in any marketing message you receive or contacting us.

## **COOKIES**

You may configure your browser to refuse all or certain browser cookies. Please be aware that if you disable or refuse cookies, certain elements of our website may become unavailable or stop working correctly. Please check our Cookie Policy for more information on the cookies we use.

## **CHANGE OF PURPOSE**

We will only use your personal data for the reasons for which it was acquired, unless we believe that we need to use your personal data for another reason and this provided that is compatible with the original purpose, and this as per the GDPR.

If we need to use your personal data for a different reason, we will let you know and explain the legal basis for doing so. Please contact us if you would want an explanation of how the processing for the new purpose is compatible with the original purpose.

Please be aware that, when needed or authorized by law, we may handle your personal data without your knowledge or consent, in accordance with the aforementioned guidelines.

## **5. PERSONAL DATA DISCLOSURES**

For the objectives stated above, we may be required to disclose your personal data with the types of parties listed below.

We are involved in delivering services to you, whether directly or through the provision of underlying infrastructure services on our behalf and instruction.

- External third parties, such as business partners, suppliers, and subcontractors, for the performance of any contract we enter into with them or you; this includes contractors who provide services to you in their own name, such as the third-party provider of Wi-Fi services, as well as our other providers acting as processors on our behalf and as instructed by us (providers of analytics and search engine results who help us enhance and optimise our services and website (as processors operating on our behalf and as authorized by us);
- entities involved in credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management, and dispute resolution;
- tax and customs authorities, public registry authorities, regulators, and other authorities;
- entities involved in credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management, and dispute resolution.

We require these third parties to preserve the security of your personal data and to treat it in accordance with the law if they are our processors. Some of the aforementioned third parties, such as numerous professional advisers and authorities, are controllers who, like us, are subject to particular data protection duties and will have their own privacy statements outlining how they handle personal data.

## **6. SECURITY OF DATA**

We have implemented adequate security measures to protect your personal data from being lost, misused, accessed in an unauthorized manner, changed, or exposed by mistake. Furthermore, we restrict access to your personal data to employees, agents, contractors, and other third parties that require it for business purposes. Our appointed processors will only treat your personal data in accordance with our instructions.

We've put processes in place to deal with any personal data breaches, and we'll inform you and any applicable regulators if we're legally obligated to.

## **7. RETENTION OF DATA**

### *HOW LONG ARE YOU GOING TO USE MY PERSONAL INFORMATION?*

We will only keep your personal data for as long as it is required to fulfill the reasons for which it was acquired, including to comply with any legal, accounting, or reporting obligations, in order to enforce our terms and conditions and safeguard ourselves against legal claims.

You can ask us to remove your data in certain circumstances.

For research or statistical reasons, we may anonymize your personal data (such that it can no longer be linked to you), in which case we may use this information indefinitely without additional notification to you.

## **8. YOUR LEGAL RIGHTS**

As a data subject, you have certain rights in respect of the processing of your personal data, and this in terms of the data protection regulations. To learn more about these rights, please click on the following links:

**[Make a request for access to your personal information.](#)**

**[Request that your personal information be corrected.](#)**

**[Request that your personal data be erased.](#)**

**[You have the right to object to the processing of your personal data.](#)**

**[Request that your personal data be restricted from being processed.](#)**

**[Make a request for the transfer of your personal information.](#)**

**[Revocation of consent.](#)**

**[Lodge a Complaint](#)**

Please contact us if you desire to exercise any of the rights listed above.

We may need to ask you for further information to verify your identity and establish your right to access your personal data (or to exercise any of your other aforementioned rights). This is a security step to guarantee that personal information is not shared with anybody who does not have permission to receive it. We may also call you to obtain further information about your request so that we may better serve you.

We strive to respond to all genuine inquiries, within a period of one month. If your request is especially complicated or we have received a large number of enquiries, it may take us longer than a month to respond. We will alert you and keep you updated in this scenario.

## YOUR STATUTORY RIGHTS

You have the legal authority to perform the following and this in terms of the GDPR:

### 1. **Make a request for access to your personal information.**

Make a request to access your personal information (commonly known as a "data subject access request"). This allows you to obtain a confirmation as to whether your personal data has been processed and, where this is the case, access to the said personal data to ensure transparent and fair processing.

### 2. **Request that your personal information be corrected.**

Make a request in order for us to rectify, without undue delay, any inaccurate personal information we have on you. This allows you to amend any missing or incorrect information we have about you, including by means of a supplementary statement. However, we still may need to verify the veracity of the new information you give.

### 3. **Request that your personal data be erased.**

Make a request in order for us to erase or remove your personal data ("**right to be forgotten**"), without undue delay, and this unless there is no compelling reason for us to keep it. The right to be forgotten may be exercised, if one of the following grounds applies:

- (a) The retention of the personal data is no longer required for the purpose for which it was processed or collected;
- (b) Where there is no other legal ground for processing;
- (c) If you withdraw your consent, in terms of the GDPR;
- (d) If you have successfully exercised your right to object to processing (see point 4);
- (e) If we have unlawfully processed your data;
- (f) If we are compelled to erase your personal data, in terms of European Union Law or Maltese law;
- (g) Your personal data was collected in relation to the offer of information society services.

Please keep in mind that we may not always be able to comply with your request for erasure due to particular legal reasons that will be communicated to you at the time of your request.

### 4. **You have the right to object to the processing of your personal data.**

The right to object to the processing of your personal data on grounds relative to your situation, in terms of the GDPR, including also where the processing takes place due to our legitimate interests (or the legitimate interests of a third party). You also have the right to object if your personal data is being used for direct marketing purposes. We may be able to show that we have compelling legal grounds to handle your information that outweigh your rights and freedoms in some instances.

### 5. **Request that your personal data be restricted from being processed.**

This allows you to request that the processing of your personal data be restricted if one of the following grounds apply:

- (a) If you contest the accuracy of your personal data, for the period which it takes us to verify the correctness of your data;
- (b) If we processed your data in an unlawful manner and you request a restriction of its use, rather than its erasure;
- (c) We no longer require the processing of your personal data, however, you require it for the exercise, establishment or defence of legal claims;
- (d) You have objected to the processing of your data, but we need to verify whether there is in existence overriding legitimate grounds.

### 6. **Make a request for the transfer of your personal information.**

Make a request that your personal data be transferred to you or a third party ("**the right to data portability**"). We shall transmit your personal data in a structured, generally used, machine-readable manner to you or a third



party you specify. This right only applies if you consented to its use or if we utilized the information for the performance of a contract concluded with you and if the processing is carried out by automated means.

#### **7. Revocation of consent.**

Where we rely on consent to handle your personal data, you can withdraw your consent at any time. However, the lawfulness of any processing carried out before you withdraw your permission will not be affected. We may not be able to offer you with some products or services if you withdraw your permission. If this is the case, we will notify you when you withdraw your consent.

#### **8. Lodge a Complaint**

You have the right to file a complaint with the data protection body that oversees us at any time, Information and Data Protection Commissioner (Office of the Information and Data Protection Commissioner, Floor 2, Airways House, Triq Il - Kbira, Tas-Sliema SLM 1549, Malta <https://idpc.org.mt>). However, we would welcome the opportunity to address any issues before approaching the Authority, so please contact us first.

### **10. PRIVACY POLICY FOR WEBSITE COOKIES AND TRACKING**

This website (<http://www.urbanvalley.com/>) is operated by the Urban Valley Resort & Spa, represented by High End Properties Ltd ("Urban Valley Resort & Spa," "we," or "we") (the "Website"). Every person who visits and navigates our website has the right to privacy, which Urban Valley Resort & Spa respects. Urban Valley Resort & Spa values the privacy of its customers and adheres to all applicable data protection laws. This Website Cookies and Tracking Privacy Policy explains how we utilize any personal information we gather about you, as well as your rights to view and rectify such data.

#### **CONSENT**

You consent to the use of cookies in line with this Cookies Policy by using this Website. On your first visit to this website, you will have seen a pop-up to this effect; while it will not generally display on future visits, you may withdraw your approval at any time by following the steps below.

#### **DISABLING COOKIES**

If you do not want these cookies to be used, you can deactivate them by following the instructions for your browser here. Please be aware that if cookies are deactivated, some of the services will not operate properly.

We give the name of the organization setting the cookie, the category of cookies it sets, and a link to its automatic deactivation tool in cases where the company setting the cookie offers one. In all other situations, we provide the names of the cookies and their sources at the time this Cookies policy was published, so you may easily identify and deactivate them using your browser settings.

You may opt out of having your internet surfing habits recorded in some browsers. Some usage of the Website and the services provided on the Website may be hampered if tracking is disabled.

We may alter the cookies we use after your first visit to the Website. This cookies policy, which can be found at [www.urbanvalleyresort.com/privacy-policy](http://www.urbanvalleyresort.com/privacy-policy), will always inform you about who is putting cookies, why they are being placed, and how to disable them, so you should review it periodically.

#### **WHAT EXACTLY IS A COOKIE?**

A cookie is a tiny text file that a website places on a computer or device to save small bits of information. Cookies let a computer or device remember what a user has done on a website, such as remembering whether or not the user has logged in or which buttons have been clicked. Cookies are unable to transmit viruses or install malware.

## WHY DO WE USE COOKIES AT URBAN VALLEY RESORT & SPA, AND HOW LONG DO WE KEEP THEM?

Urban Valley Resort & Spa use cookies and other technologies to distinguish consumers, as well as to better understand and facilitate your browsing and booking habits. We use this data to enhance our websites so that our visitors have the best possible experience. Cookies and other similar technologies are also used on our website by carefully chosen third-party partners.

Cookies are helpful because they allow a website to recognize the device that a user is using. Cookies let you move between pages more quickly, remember your settings, and improve your overall user experience. They can also be used to customize ads to your preferences by tracking your online activity across several websites.

Session cookies are immediately destroyed when you shut your browser, but persistent cookies stay on your device after you close it (for example to remember your user preferences when you return to the site).

## WHAT COOKIES DOES URBAN VALLEY RESORT & SPA USE?

We describe the categories of cookies Urban Valley Resort & Spa and its contractors use below.

### *Cookies That Are Strictly Necessary*

These cookies are required for you to be able to navigate the website and utilize its features. Services you have requested (such as browsing across websites) cannot be performed without these cookies.

### *Performance Cookies*

We employ analytic cookies to track how our visitors use our site and to keep track of how well it performs. This enables us to deliver a high-quality experience by tailoring our product and promptly detecting and resolving any difficulties that emerge. For example, we may utilize performance cookies to keep track of which pages are the most popular, the most effective technique of connecting across sites, and why some pages are receiving error messages. Based on your website usage, we may also use these cookies to highlight content or site features that we believe may be of interest to you. We and our contractors do not link the information gathered by these cookies to your personal information.

The following analytic cookies are presently in use on the Website:

Purpose and description	Cookie name	Storage time
Google Analytics places this cookie on your computer. The cookie is used to track site activity and generate visitor, session, and campaign statistics for the site's analytics report. To identify distinct visitors, the cookies save information anonymously and provide a randomly generated number.	_ga	2 years
Google Analytics places this cookie on your computer. The cookie stores information about how visitors use a website and aids in the creation of an analytics report on its performance. The anonymous data collected included the number of visitors, the source from which they came, and the pages visited.	_gid	1 day
This cookie is used to differentiate users and is set by Google.	_gat_gtag_UA_118659231_1	1 minute

### *Cookies for website functionality*

Cookies are used by us to provide you with certain features. For instance, to remember your selections (such as your user name, language, or area), or to identify the platform from which you visit the site, and to deliver improved and more personalized services. These cookies will not be used to monitor your online activity on other websites.

### *Cookies used for advertising purposes*

Advertisement cookies (also known as targeting cookies) collect information about your device's browsing behavior and are used to make advertising more relevant to you and your preferences. In addition to delivering the required functionality, they are also utilized by services supplied by third parties on this Website, such as 'Like' or 'Share' buttons. These services are provided by third parties in exchange for recognizing that you (or, more precisely, your device) have visited a specific website. These third parties place advertising cookies on your computer both when you visit our site and when you use their services and leave our site.

A single, campaign-specific "web beacon pixel" may be included in our emails to inform us whether they are opened and to authenticate any clicks through to links inside the email. We may use this information to determine which of our emails are more engaging to you, as well as to inquire about whether users who do not read our emails want to continue getting them. When you delete the email, the pixel will be removed. You can opt to get emails from us in plain text rather than HTML if you don't want the graphics to be downloaded to your device.

### *IP addresses and web logs are both used.*

Your IP address and browser type may also be used to diagnose server problems, operate our Website, and enhance the service we provide to you. Your computer's IP address is a numeric number that identifies it on the internet. Your IP address might be used to compile broad demographic data.

To better properly assess our users' demographics, we may do IP lookups to discover the domain you are coming from (e.g. google.com).

### **THIRD-PARTY WEBSITES ARE EXCLUDED FROM THE COOKIES POLICY.**

Please note that this cookies policy does not apply to third-party websites that may be connected to our Website, and we are not responsible for their privacy policies.

### **MODIFICATIONS TO THIS PRIVACY NOTICE AND COOKIES POLICY**

We may alter this Privacy Notice and Cookies Policy from time to time, and we urge you to access our website to become aware of any changes which may occur from time to time. This Policy was last updated in July of the year 2021.

### **LAW AND JURISDICTION**

The Privacy Notice and Cookies Policy shall be governed by Maltese law. Any dispute arising from, or related to, such Policy shall be subject to the exclusive jurisdiction of the courts of Malta.