

BOOKLYNG - PRIVACY POLICY of the SmartParity service

Last Update: Jun 1st, 2018

This Privacy Policy applies to Booklyng's services and describes our processing of Personal Data.

We take privacy very seriously and make it a priority. This Privacy Policy is subject to the terms of use of the Client Site's it is used into.

OUR CONTACT DETAILS

Smart Parity System, S.L. ("Booklyng").
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Email: info@booklyng.com

Data Protection Officer: Please write to our **Data Protection Officer** at the following address: dataprotection@booklyng.com

WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Booklyng is a behavioural automation software for online marketing and analytics for hotels and companies of the hotel sector (our "Clients").

Our core activity consists of processing, on our Clients behalf, usage and navigation data collected from our Client's website, and/or it's reservation system, concerning their users and visitors ("User's Clients", "Visitors", together "Users").

Our platform gets incorporated into our Client's websites/sites and integrates seamlessly with its reservation system to increase its conversion ratio and boost its share of direct bookings as a part of our Services.

Therefore, we are responsible for the Users' Personal Data as Data Processor on our Client's behalf, and following the Client's instructions, while our Clients are responsible for the Users' Personal Data as Data Controllers.

OUR PRINCIPLES AND APPLICABLE REGULATIONS ON PRIVACY

The processing of Personal Data by Booklyng is subject to the Regulation UE 2016/671 General of Protection of Data, dated April 27th, 2016 ("GDPR"), and the Spanish regulations developed by the GDPR as of its application date on May 25th, 2018.

At Booklyng we process Personal Data in accordance with the following principles:

- Process Personal Data with **legality, loyalty** and **transparency**.
- We only process Personal Data **limited to the purpose for which it was collected**.
- Data **minimization**: Treat adequate data, relevant and limited to what is necessary.

- **Accuracy:** Process accurate data and, when necessary, updated.
- **Limitation of the conservation** period (no more than the time strictly necessary for the purposes).
- **Integrity and confidentiality** (maintaining an appropriate level of security).

LEGAL BASIS WE RELY ON

We only process Personal Data following our Client's instructions, and on our Client's behalf, in the framework of our **contracts** with each Client to render our services.

We also rely on the **explicit consent** given by the Users directly to our Clients, for our Client's and/or for us, on behalf of our Clients, to offer discounts, promotions and other information which may be of interest for the Users during and/or after the reservation process. In specific situations, as part of our Services, we may ask the Users for such **explicit consent**, on our Client's behalf.

WHAT SORT OF PERSONAL DATA DO WE PROCESS AND FOR WHICH PURPOSES?

Our main purpose is to process, on behalf of our Clients, usage and navigation data collected from our Client's website, and/or its reservation system, concerning the Users, in order to track the activity of the Users for online marketing and analytics purposes.

Such data regarding our Client's Users may include information such as:

Visit Information

As the result of tracking of Client's Users behaviour in Client's websites:

- Location (Ip)
- Time Zone
- Search Referrer
- Navigation history (only on the specific site)
- User's web/online behaviour, including the number of rooms booked.

We process visit information as **anonymous aggregated data**, for providing our Services of behavioural automation software, online marketing and analytics for our Clients.

User provided Information

Only obtained by the user himself and with his explicit consent:

- Name
- Email
- Information about travelling habits and lifestyle (family, business, etc.)

We may ask Client's Users name and email and store it against an anonymous User ID, together with other information relevant to shopping behaviour in our Client's sites, and use this information to serve targeted, especially crafted offers and adverts to the Users' devices and/or email.

In no case Booklyng will process credit card details from the Client's Users.

Our Services include the automatic processing of their User's activity such as the Internet Protocol (IP) address, the operating system, the browser type, the address of a referring Web site and the Client's Users web activity and its behaviour. When we do not need to link the data with an identified or identifiable individual we process the information **in an anonymous** way (for instance, in order to produce statistics for our Clients).

We can also process Personal Data from the users of our website and/or our prospective Clients, with their explicit consent in the context of a trial of our Services or to manage their requests for commercial information. Personal Data may include identity and contact details, as well as commercial information.

Furthermore, our Services include the possibility for the Clients to make tailored custom offers and promotions to the Client's Users - those offers, being made in self service by the Client himself, are not directly managed by booklyng and can also make use of cookies that should be covered by the Client's privacy and cookie policy.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We only communicate the Personal Data to those marketing agencies and other providers of our Clients, following our Clients' instructions.

USE OF COOKIES - BOOKLYNG SMARTPARITY

Booklyng uses cookies to provide the Services to our Clients. You can check our Cookies Policy available online at this address: <https://www.booklyng.com/cookie-policy/>.

This is a complete list and description of the cookie we use to provide our service:

Name	Domain	Storage Type	Duration	Description
_spld	activator.smartparity.com	Local Storage	permanent	Booklyng ID key
_spHotelVisitorId	activator.smartparity.com	Local Storage	permanent	Customer unique id for hotel
_spVisits	activator.smartparity.com	Local Storage	permanent	number of visits
webpush_token	activator.smartparity.com	Local Storage	permanent	token generated by provider for web push notification
webpush_status	activator.smartparity.com	Local Storage	permanent	status of push notification registration (granted/denied/default)
spOfferId<<site_id>>_<<hotel_id>>	activator.smartparity.com	Local Storage	dynamic - configuration based	id of active offer
spHotelVisited<<hotel_id>>	activator.smartparity.com	Local Storage	session	set when the visit begins
_spImpact_Show_<<action_id>>	activator.smartparity.com	Local Storage	dynamic - configuration based	set when the widget <<action_id>> is shown

_spImpact_Click_<<action_id>>	activator.smartparity.com	Local Storage	dynamic - configuration based	set when the widget <<action_id>> is clicked
_spImpact_Accepted_<<action_id>>	activator.smartparity.com	Local Storage	dynamic - configuration based	set when there is a registration (explicit or implicit) of a campaign <<action_id>>
AWSALB	activator.smartparity.com	Cookie	permanent	Technical cookie
lb-rnch-sp	activator.smartparity.com	Cookie	permanent	Technical cookie
lb-stk	piwik.smartparity.com	Cookie	permanent	Technical cookie
_spImpressions	<<hotel_domain>>	Session Storage	session	list of number of impressions for each action
booklyngTriggerFired<<hotel_id>>_<<action_id>>	<<hotel_domain>>	Session Storage	session	set when a widget is shown
push_webpush	<<hotel_domain>>	Local Storage	permanent	status of push notification registration (granted/denied/default)
push_mail	<<hotel_domain>>	Local Storage	permanent	status of email notification registration (granted/denied/default)
push_sms	<<hotel_domain>>	Local Storage	permanent	status of sms notification registration (granted/denied/default)
_sp_history_<<site_id>>	<<hotel_domain>>	Local Storage	dynamic - configuration based	history of customer last searches
_spBookingData	<<hotel_domain>>	Cookie	session	data searched by customer before the reservation
spCGroup<<action_id>>	<<hotel_domain>>	Cookie	dynamic - configuration based	id of the offer in control group
spOfferId<<site_id>>_<<hotel_id>>	<<hotel_domain>>	Cookie	dynamic - configuration based	id of active offer
spChainOffers<<site_id>>	<<hotel_domain>>	Cookie	permanent	list of chain offer ids
spHotelOffers<<site_id>>_<<hotel_id>>	<<hotel_domain>>	Cookie	permanent	list of hotel offer ids
_spVisitId	<<hotel_domain>>	Cookie	session	Customer unique id for visit
_spVisits	<<hotel_domain>>	Cookie	permanent	number of visits
_spId	<<hotel_domain>>	Cookie	permanent	Booklyng ID key
_spHotelVisitorId	<<hotel_domain>>	Cookie	permanent	Customer unique id for hotel
_spUtmz	<<hotel_domain>>	Cookie	1 day	custom utmz value
sp<<action_id>>#<<site_id>>#<<hotel_id>>	<<hotel_domain>>	Cookie	dynamic - configuration based	to show the widget each 'x' ms, in order to avoid spam
_spSwitchLoyalty	<<hotel_domain>>	Cookie	session	push service
_spUserPreferences	<<hotel_domain>>	Cookie	session	push service
_spUserLogin	<<hotel_domain>>	Cookie	session	push service

There could be other cookies used for specific campaigns, they are not part of the platform but they depend on how the campaigns are configured and edited.

Legenda:

<<site_id>>	Hotel Chain ID
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<<hotel_id>>	Hotel code ID
<<action_id>>	ID of action/campaign
<<hotel_domain>>	Hotel domain