



Juan Manuel Barr^oent^os

HOTEL & RESTAURANT

BROWSING DATA / COOKIES POLICY

1. OBJECTIVE.

This Cookie Data Policy establishes the terms and conditions under which HOTELES DE LUJO SAS's website collects information from visitors' computer equipment through browser cookies, in order to improve its services.

2. SCOPE.

The principles and provisions contained in this Policy will be applied to the browsing data, collected by the cookies, that are under the custody of HOTELES DE LUJO S.A.S. All organizational processes that involve browsing data or cookies must be subject to the provisions of this document.

3. RESPONSIBLE FOR THE POLICY.

This Policy is mandatory and strict compliance by the following people:

- A. Legal representatives of HOTELES DE LUJO S.A.S.
- B. Workers of HOTELES DE LUJO S.A.S.
- C. Contractors and third parties acting on behalf of HOTELES DE LUJO S.A.S. or who provide their services to it, under any type of contractual modality, who have access to the data collected through cookies.
- D. Shareholders and tax auditors.
- E. Other people established by law.

4. WHAT ARE COOKIES?

A cookie is a small file of letters and figures that is stored in the user's browser when accessing certain web pages. The use of the concept "cookie" in this policy also refers to similar technologies that allow data to be stored from the computers of users or visitors. Through cookies, web pages collect information about the different web pages that users navigate to. Cookies are not a virus or any other type of malicious program that can damage users' devices, and they are used in most web pages. Additionally, cookies cannot erase or read information from the user's computer or devices.

5. WHAT KIND OF COOKIES ARE STORED AND USED.

The website of HOTELES DE LUJO S.A.S. stores both its own and third-party cookies to adapt the content to your interests and facilitate your browsing. The following are the types of cookies stored:

- A. Own cookies.
- B. Third-party cookies.
- C. Technical cookies.
- D. Preference or customization cookies.
- E. Analysis or measurement cookies.
- F. Behavioral advertising cookies.
- G. Session cookies
- H. Persistent cookies

HOTELES DE LUJO S.A.S., its representative, its workers and its contracted third parties are the only people who can access the information collected by cookies. The information stored in cookies cannot be read by other users, nor can they access it.

6. TECHNOLOGIES USED.

HOTELES DE LUJO S.A.S. uses various technologies that allow it to monitor the activities carried out by visitors on its website. The above information is collected to compile statistics on visitor activity to improve the browsing experience of users. Among the technologies used are Clear GIFs, pixel tags and others.

The website of HOTELES DE LUJO S.A.S. collects user information by storing cookies on the visitor's hard

drive. To analyze the information collected, Google Analytics services are used. When the user connects again with the HOTELES DE LUJO S.A.S. website, the number stored in the "cookie" will be recognized. The procedures are managed and controlled exclusively by Google Analytics.

The privacy statement and privacy and cookie policies of Google Analytics can be found at the following link: <https://support.google.com/>

7. AUTHORIZATION OF COOKIES.

To ensure the proper functioning of the website, the user must accept the collection and use of all cookies on the website. It is not allowed or recommended to disable any type of cookies. If the user does not wish to provide access, treatment and collection of cookies, we recommend not visiting the website of HOTELES DE LUJO S.A.S.

8. SECURITY AND CONFIDENTIALITY.

To guarantee the protection of privacy and confidentiality of information, the website includes measures such as data encryption, automatic logout due to inactivity and automatic blocking of unauthorized access. Access to a user's online account requires a password to guarantee the confidentiality and security of the information.

9. CLAIMS AND RIGHTS.

This Policy contains the necessary information that every user of the website should know about the use of cookies made by HOTELES DE LUJO S.A.S. This policy may be modified at any time and without prior notice; therefore, we recommend that users review the date of preparation or update of the same.

10. RESPONSIBLE FOR THE PROCESSING OF INFORMATION.

Name: HOTELES DE LUJO S.A.S.

Nit: 901417342 - 3

To exercise the rights conferred by law, each user can make their request to the following email address: protecciondatos@elcielohotel.com

Physical address: Calle 7D # 43c 36 - Medellín Telephone: (+57 604) 4482396 Option. 4

This Policy was last updated on September 15, 2021.