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guia@sammuntanya.com
@sammuntanya.guia
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PRIVACY POLICY

SAM MUNTANYA | Mountain guide

TABLE OF CONTENTS

1. Data Controller
2. What personal data may we process?
3. For what purposes do we use the data?
4. What is the legal basis for processing?
5. Is it mandatory to provide the data?
6. Information related to participation in activities
7. Communications related to activities
8. WhatsApp Group
9. Use of images and recordings
10. Who may we share the data with?
11. International data transfers
12. How long do we retain the data?
13. What rights does the data subject have?
14. Security and confidentiality
15. Data of minors
16. Cookies
17. Updates to the Privacy Policy
18. Legal framework

1. Data Controller

The data controller responsible for the processing of personal data collected through this website and the services provided by **SAM MUNTANYA** is:

Holder: Samuel Rivero Navarro

Trade name: SAM MUNTANYA

Tax Identification Number (NIF): 53869062A



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Email: guia@sammuntanya.com

Website: <https://sammuntanya.com/>

This Privacy Policy aims to inform users and participants about how their personal data is collected, used, stored and protected.

2. What personal data may we process?

Depending on the relationship with SAM MUNTANYA and the service used, we may process the following personal data:

- Name and surname.
- Age.
- Telephone number.
- Email address.
- Data related to registration and participation in activities.
- Data necessary for payment and invoicing management.
- Communications with SAM MUNTANYA.
- Information voluntarily provided by the participant that is relevant to the proper development of the activity.
- Images or audiovisual recordings, only when the corresponding authorization exists.

SAM MUNTANYA will apply the principle of **data minimization**, meaning that only data that is adequate, relevant and necessary for the corresponding purposes will be collected and processed.

3. For what purposes do we use the data?

Personal data may be processed for the following purposes:

- Managing information and contact requests.
- Managing registrations for activities.
- Managing the confirmation of places and payments.



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- Issuing and managing invoices.
- Managing cancellations, changes, refunds and incidents related to activities.
- Organizing and carrying out the contracted activities.
- Providing the necessary information before, during or after the activity.
- Managing operational communications related to the activity.
- Managing, where applicable, the accident insurance associated with the activity.
- Handling enquiries, incidents, complaints or requests from users or participants.
- Complying with applicable legal obligations.
- Exercising or defending the rights and legitimate interests of SAM MUNTANYA when necessary.
- Using images or audiovisual recordings when the data subject has provided the corresponding consent.

The data will not be used for purposes incompatible with those described in this Privacy Policy.

4. What is the legal basis for processing?

The processing of personal data is based, depending on the circumstances, on the following legal bases:

Performance of a contract or implementation of pre-contractual measures: to manage a registration, booking, payment, activity or request for information related to the contracting of services.

Compliance with legal obligations: when processing is necessary to comply with tax, accounting, administrative or other obligations established by applicable law.

Consent: when the applicable regulations require the consent of the data subject, as may occur with certain uses of images.

Legitimate interest: when applicable and provided that this interest does not override the rights and freedoms of the data subject.



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5. Is it mandatory to provide the data?

The data necessary to manage a registration, contract, payment or provision of a service will generally be necessary in order to manage these processes.

Data that is not necessary for the provision of the service and that is requested on a voluntary basis does not have to be provided.

In registration forms, when a question is voluntary, this will be indicated.

Refusal to provide necessary data may prevent the registration from being managed or the corresponding service from being provided.

6. Information related to participation in activities

For certain activities, it may be necessary for the participant to communicate a personal circumstance that may be relevant in order to participate appropriately and safely.

This information will be provided **voluntarily** and will only be requested when relevant to the proper management of the activity.

There is no need to provide diagnoses, medical reports or detailed clinical information.

When the information provided contains health-related data or other specially protected data, SAM MUNTANYA will process it in accordance with applicable regulations, adopting the necessary safeguards and measures and limiting its processing to what is strictly necessary for the corresponding purpose.

7. Communications related to activities

SAM MUNTANYA may use the contact details provided to send communications directly related to a registration or activity, such as:

- Registration confirmation.
- Payment instructions.
- Confirmation of the place.
- Invoice.



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- Logistical information.
- Meeting point and time.
- Recommended equipment.
- Weather information related to the activity.
- Changes, modifications, postponements or cancellations.
- Notices or incidents related to the activity.

These communications have an **operational and service-management purpose** and do not, in themselves, constitute commercial communications.

Any commercial or promotional communication that requires consent will be sent in accordance with applicable regulations and, where necessary, with the corresponding consent.

8. WhatsApp Group

For activities that have a WhatsApp group, joining the group will be **voluntary**, and the link will only be provided to people whose place has been confirmed.

The group will be used as an **operational and logistical communication channel for the activity**, particularly to share practical information, notices and matters related to the day.

Up to 72 hours before the activity, the group will operate in a one-way communication format. Once the registration period has closed, it may remain open to resolve last-minute questions or issues.

When joining the group, the participant's telephone number and, depending on their WhatsApp account settings, certain profile information may be visible to the other participants.

This visibility results from the way WhatsApp operates and from the configuration of the service and does not mean that SAM MUNTANYA manually provides this data to the other participants.

Participants who do not wish to join the group may continue to receive the necessary communications through the alternative channels provided by SAM MUNTANYA.

SAM MUNTANYA recommends not sharing personal information in the group that is not necessary for the development of the activity.



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9. Use of images and recordings

Photographs or audiovisual recordings may be taken during certain activities. The use of identifiable images of participants for communication, promotional or dissemination purposes of SAM MUNTANYA will, where necessary, be carried out with the **prior, informed and voluntary consent** of the data subject. Authorization for the use of images will be independent of registration for the activity, and refusal **will not prevent participation** in the activity.

The data subject may withdraw their consent at any time by writing to:

guia@sammuntanya.com

Withdrawal of consent will not affect processing lawfully carried out before its withdrawal.

The specific conditions relating to the use of images can be consulted in the corresponding **SAM MUNTANYA Image Use Policy**, where applicable.

10. Who may we share the data with?

Personal data will not be disclosed to third parties except where there is a legal basis allowing this or where it is necessary for the provision of the service or compliance with a legal obligation.

Depending on the circumstances, the data may be accessible to:

- Technology service providers necessary for the operation of the website, forms, email or other management tools.
- Banks and payment service providers.
- Insurance companies or insurance brokers where necessary to manage the insurance associated with an activity.
- Accountants, advisors or other professionals providing administrative, tax or accounting services.
- Public authorities, official bodies, courts or tribunals where there is a legal obligation.
- Other providers necessary to provide the contracted services.



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Where these third parties process personal data on behalf of SAM MUNTANYA, efforts will be made to ensure that the contractual and legal safeguards required by applicable regulations are in place.

11. International data transfers

Some of the technological services used by SAM MUNTANYA may involve the processing of personal data outside the European Economic Area.

Where an international transfer of data takes place, it will be carried out in accordance with the requirements established by the General Data Protection Regulation and through the legally contemplated safeguards, such as an adequacy decision or the appropriate safeguards applicable in each case.

12. How long do we retain the data?

Personal data will be retained for as long as necessary to fulfil the purposes for which it was collected.

Afterwards, it may be retained in a duly blocked form for the periods necessary to comply with legal obligations or to address any potential liabilities arising from the processing or contractual relationship.

Data relating to tax, accounting or administrative obligations will be retained for the periods established by applicable regulations.

Where processing is based on consent, the data will be retained until consent is withdrawn, without prejudice to any periods that may be necessary to demonstrate the lawfulness of the processing or to address potential liabilities.

13. What rights does the data subject have?

The data subject may exercise, where applicable, the following rights:

- **Access** to their personal data.
- **Rectification** of inaccurate or incomplete data.
- **Erasure** of data where applicable.
- **Restriction** of processing.
- **Objection** to processing.



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- **Data portability** in the cases provided for by law.
- **Withdrawal of consent** where processing is based on consent.

To exercise these rights, a request may be sent to: **guia@sammuntanya.com**

The request must specify the right being exercised and include the information necessary to identify the applicant and properly process the request.

The data subject also has the right to lodge a complaint with the **Spanish Data Protection Agency (AEPD)** if they consider that the processing of their personal data infringes applicable regulations.

14. Security and confidentiality

SAM MUNTANYA adopts appropriate technical and organizational measures, taking into account the risks associated with processing, to protect personal data against destruction, loss, alteration, disclosure or unauthorized access.

Persons who have access to personal data in the context of providing the services will act in accordance with the confidentiality obligations applicable to them.

However, no system for storing or transmitting information over the Internet can guarantee absolute security.

15. Data of minors

SAM MUNTANYA activities may be open to minors when the characteristics of the activity allow it.

Where required by applicable regulations, the processing of minors' personal data will be carried out with the involvement or authorization of the person exercising parental responsibility, guardianship or the corresponding legal responsibility.

SAM MUNTANYA may request the information or authorization necessary to properly manage the minor's participation.



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16. Cookies

The SAM MUNTANYA website mainly uses technical and functional cookies that are necessary for the proper functioning of the website.

Currently, among others, first-party cookies related to the operation of WordPress have been identified, such as **wordpress_test_cookie** and **wp_lang**.

The third-party services currently integrated into the website, such as Google Reviews, Instagram or GTranslate, have been checked and, in the tests carried out, have not generated non-essential cookies during an ordinary visit.

Detailed information about the cookies used can be found in the **SAM MUNTANYA Cookie Policy**.

17. Updates to the Privacy Policy

SAM MUNTANYA may modify this Privacy Policy when necessary to adapt it to legislative, case-law, administrative, technological or service-related changes.

The updated version will be available on the website.

18. Legal framework

This Privacy Policy has been prepared in accordance with the applicable regulations on the protection of personal data, in particular:

- **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR).**
- **Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD).**
- Any other applicable regulations concerning data protection and information society services.

In the event of changes to the applicable regulations, this Policy will be interpreted and applied in accordance with the provisions in force.