# CASA SIMONA

# PRIVACY POLICY - CASA SIMONA

INMOBILIARIA TURÍSTICA EL VALLE, S.A., a Panamanian company duly registered under folio 155706268 of the Mercantile Section of the Public Registry, with its registered office at Costa del Este, PH Torre Banco Aliado, 20th Floor, Panama City; website www.casasimona.com, is responsible for the use and protection of your personal data, and in this regard, we inform you as follows:

#### **Prior Consent**

By providing your personal data, you consent to its processing in accordance with the privacy policies available at the link at the bottom of this page.

If Casa Simona collects personal data through channels other than the website (email, WhatsApp, or other means), a written consent form will be provided containing the data subject's details, the privacy policy, and a space for express acceptance and signature.

#### 1. What Personal Data We Collect

We may collect name, addresses, emails, phone numbers, date of birth, gender, payment information, accommodation preferences, recreational activities, relevant health information, and any other information necessary to fulfill your request.

#### 2. With Whom We Share Your Personal Data

We may transfer your data within or outside Panama only when:

- It is necessary to provide the requested service.
- It is required by service providers contractually linked to Casa Simona.
- It is required by a competent authority in the exercise of its functions.

There is an emergency situation that endangers the life, health, or property of a person.

In the case of international transfers, we will verify that the recipient country has adequate levels of data protection or that there is a legal basis for the transfer (Art. 33 of Law 81 of 2019).

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### 3. Purposes for Which We Use Your Personal Data

The personal data we collect will be used to:

- Complete reservations or requests for information.
- Purchase products or services.
- Register in partner programs.
- Submit job applications.
- Respond to communications we send you (surveys, offers, booking confirmations).
- Fulfill personal preferences and special requests (including health data, considered sensitive personal data).
- Personalize your experience and provide recommendations.
- Use our applications on your devices.
- Facilitate the transmission of messages to third parties at the request of the data subject.

Additionally, with your consent, we may use your data for marketing, advertising, business prospecting, sending promotions, and satisfaction surveys.

### 4. Your Rights as a Data Subject

You may exercise your rights of access, rectification, cancellation, opposition, portability, and the right not to be subject to decisions based solely on automated processing, pursuant to Law 81 of 2019. To exercise these rights, you must send a request to privacidad@casasimona.com.

Requests will be processed within 10 business days, extendable by 5 additional business days in justified cases.

### 5. Revocation of Consent and Limitation of Use or Disclosure

You may revoke the consent granted, in whole or in part, at any time, except when we are legally required to retain the data. Revocation may mean that we can no longer provide certain services.

Within the scope of partial revocation, you may request exclusion from our internal marketing lists by sending an email to privacidad@casasimona.com.

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# 6. Online Technologies

We may use cookies and similar technologies to improve your experience. You can configure your browser to reject cookies, bearing in mind that this may limit some functionalities.

# 7. Third-Party Links

Our sites may contain links to third-party websites. Casa Simona is not responsible for the privacy policies of such sites.

#### 8. Modifications to this Notice

We may update this notice to reflect legal changes or our internal practices. Modifications will be published at www.casasimona.com/privacidad, indicating the date of the latest update.

#### 9. Data Protection Officer

Our company has a designated Data Protection Officer to ensure the correct implementation of security measures and compliance with Law 81 of 2019 on Personal Data Protection and its Executive Decree No. 285 of 2021. For any matters related to the processing and protection of your personal data, you may contact us by sending an email to privacidad@casasimona.com.

### 10. Supervisory Authority

The competent authority to oversee compliance with the regulations is the National Authority for Transparency and Access to Information (ANTAI). More information at www.antai.gob.pa.

### **Commitment in Case of Security Incidents**

In the event of a security incident compromising your personal data, Casa Simona undertakes to adopt the measures provided by Law 81 of 2019, including notification to the National Authority for Transparency and Access to Information (ANTAI) and the affected data subjects, as well as the immediate implementation of corrective and mitigating actions.