

PRIVACY POLICY

Last updated: August 2026

This document is an English translation of the Spanish Privacy Policy for information purposes. In the event of any discrepancy, the Spanish version shall prevail to the extent permitted by applicable law.

At Calma Nórdica, we are committed to protecting the privacy of people who visit our website, make an enquiry or book a stay. This Privacy Policy explains what personal data we process, why we use it, the lawful bases for processing, who may receive it, how long it is kept and the rights available to data subjects.

1. Data controller

Controller	Joaquín Vierna Fernández
Trading name	Calma Nórdica
Spanish tax/ID number (NIF/DNI)	32692120N
Address	As Cascas s/n, San Adrián de Veiga, 15367 Ortigueira (A Coruña, Galicia, Spain)
Email	info@calmanordica.com
Website	www.calmanordica.com

2. Personal data we process

Depending on your relationship with Calma Nórdica, we may process the following categories of personal data:

- Identification and contact details: first name, surname, email address, telephone number and any other details provided by the data subject.
- Enquiry and booking information: intended arrival and departure dates, number of guests, place of origin, preferences, communications relating to the stay and any other information required to manage an enquiry or booking.
- Payment and invoicing information: information needed to manage payments, refunds and invoices and to comply with applicable tax and accounting obligations.
- Guest information required by law: where applicable, mandatory information will be collected in accordance with the rules governing accommodation services, including Spanish Royal Decree 933/2021 of 26 October. This may include first name and surname, sex, identity document or passport details, nationality, date of birth, address or usual place of residence, contact details, dates of arrival and departure and any other information required by law.
- Technical and browsing data: where applicable, IP address, browser or device information and data relating to use of the website, particularly where cookies or similar technologies are used.

As a general rule, Calma Nórdica does not request special-category personal data. Please do not provide this type of information unless it is strictly necessary to deal with a specific request and there is an appropriate lawful basis for processing it.

3. Purposes and lawful bases

3.1. Enquiries and requests for information

Information provided through the website, by email, telephone or other contact channels will be used to respond to enquiries and requests. The lawful basis will be taking steps at the data subject's request prior to entering into a contract where the enquiry concerns a potential booking and, in other cases, our legitimate interest in responding to and managing communications received.

3.2. Managing bookings and stays

Personal data will be processed to check availability, prepare quotations, manage and confirm bookings, organise the stay, manage payments, deal with accommodation-related requests and provide the contracted service. The lawful basis is performance of a contract or taking pre-contractual steps at the data subject's request under Article 6(1)(b) GDPR.

3.3. Compliance with legal obligations

Certain personal data may be processed to comply with legal obligations applying to the accommodation, including tax, accounting, tourism, public security and guest registration/reporting obligations. The lawful basis is compliance with a legal obligation under Article 6(1)(c) GDPR.

In particular, where required, Calma Nórdica will submit mandatory guest information using the systems made available by the Spanish Ministry of the Interior.

3.4. Incidents, complaints and legal claims

Personal data may be retained and used where necessary to manage incidents, deal with complaints, or establish, exercise or defend administrative or legal claims. The lawful basis will be compliance with legal obligations and, where appropriate, Calma Nórdica's legitimate interest in defending its rights.

3.5. Cookies and similar technologies

Strictly necessary technical cookies may be used to enable the website to operate correctly. No analytics, advertising or other cookies requiring consent will be used.

4. Source of personal data

As a general rule, personal data is obtained directly from the data subject through website forms, email or telephone communications, the booking and stay management process and documentation provided to comply with statutory accommodation obligations.

Where a person makes a booking on behalf of other guests, they must ensure that they are authorised to provide the necessary information about those people and that those guests are informed about the processing of their personal data.

5. Recipients of personal data

As a general rule, personal data will not be disclosed to third parties unless disclosure is required by law, is necessary to manage or provide the requested service, or another valid lawful basis applies.

- Public authorities and bodies, including the Spanish Ministry of the Interior and law enforcement authorities, where required under guest registration and reporting rules.
- Tax authorities, courts and other public authorities where disclosure is legally required.
- Banks or payment service providers where necessary to manage charges, transfers or refunds.
- Service providers needed for the technical operation of the website, communications, data storage or booking management. Where applicable, such providers will act as processors subject to the safeguards required by the GDPR.

6. International transfers

As a general rule, Calma Nórdica will seek to use service providers that process personal data within the European Economic Area. If a service provider processes personal data from a country outside the European Economic Area, Calma Nórdica will verify that the transfer is supported by a valid GDPR mechanism, such as a European Commission adequacy decision, Standard Contractual Clauses or another legally recognised safeguard.

7. Retention periods

Personal data relating to enquiries that do not result in a booking will be kept for as long as necessary to deal with the enquiry and subsequently for a reasonable period to address any potential liability arising from the communication.

Booking and contractual data will be kept for as long as necessary to provide the service and, once the relationship has ended, for the periods during which legal, tax, contractual or administrative liabilities may arise.

Information used for invoicing and compliance with tax or accounting obligations will be retained for the periods required by applicable law.

Guest records and information will be kept for the periods required by the applicable accommodation rules. Where the retention obligation under Spanish Royal Decree 933/2021 applies, the relevant register will be retained for three years from the end of the service, subject to any specific legal rules applying to the type of operator concerned.

Data processed on the basis of consent will be kept until consent is withdrawn, without prejudice to any additional retention period required to comply with legal obligations or defend legal claims.

8. Your data protection rights

Where applicable, data subjects may exercise the rights of access, rectification, erasure, objection, restriction of processing and data portability. They may also withdraw consent at any time, without affecting the lawfulness of processing carried out before consent was withdrawn.

To exercise these rights, you may send a request to [CONTACT EMAIL] or write to Calma Nórdica, As Cascas s/n, San Adrián de Veiga, 15367 Ortigueira, A Coruña, Spain. The request should specify the right being exercised and contain the information needed to identify the applicant. Additional information to verify identity will only be requested where there are reasonable doubts about the applicant's identity.

If you believe that your personal data is being processed in breach of applicable data protection law, you may lodge a complaint with the Spanish Data Protection Agency (Agencia Española de Protección de Datos — AEPD), without prejudice to any other administrative or judicial remedy available to you.

9. Security

Calma Nórdica will implement appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, taking account of the nature of the data, the risks involved and the state of the art.

10. Third-party links and services

The website may include links to or integrations with third-party services such as maps, social networks or other external services. When a user accesses a third-party service, the processing of personal data will be subject to that provider's own terms and privacy policy.

11. Children

Bookings must be made by persons with sufficient legal capacity to enter into a contract. Personal data relating to children that must be provided as a result of their stay will only be processed to manage the stay and comply with applicable legal obligations.

12. Changes to this Privacy Policy

This Privacy Policy may be amended where necessary to reflect legislative, case-law, technical or processing-related changes. The version in force will be the version published on www.calmanordica.com, together with the date on which it was last updated.