

LEGAL TERMS AND CONDITIONS FOR THE #INSTAGRAMPOINT FITUR 2026 DRAW

VINCCI HOTELES, S.A., with Tax ID Number A-82919945, registered address at C/ Anabel Segura, No. 11, Building C, Ground Floor, Albatros Business Centre, 28108 Alcobendas (Madrid), plans to hold a promotional event as part of FITUR 2026, from 21 to 25 January, from the profile that the organiser of the draw, Vincci Hoteles SA, has on the social network Instagram (https://www.instagram.com/vincci_hoteles/).

This promotion consists of giving away:

An indivisible 2-NIGHT stay for TWO PEOPLE at VINCCI HOTELES (standard double room with bed and breakfast) by making a prior reservation at: marketing@vincchihoteles.com, to one of the people who, meeting the requirements and accepting the conditions set out in these rules, participates in this draw.

1. SUBJECTIVE AND GEOGRAPHICAL SCOPE.

Any person of legal age may participate in the draw. All personnel of the company organising this promotional activity, as well as their relatives, are excluded from participation.

2. TIME FRAME

The promotion/participation begins **on January 21st**, at the opening of FITUR, and ends **on January 25th**, at the closing of FITUR, Iberian Peninsula time. Participation will be open throughout the entire duration of the Vincci Hotels stand at FITUR.

If, due to circumstances beyond our control, it is necessary to postpone, modify, cancel or repeat the promotion/campaign, all participants will be notified via the Vincci Hotels Instagram profile (https://www.instagram.com/vincci_hoteles/).

3. PRIZE

The prize for the **DRAW** consists of:

An indivisible 2-NIGHT stay for TWO PEOPLE at a VINCCI HOTELES establishment in Spain or Portugal (standard double room with bed and breakfast) by making a prior reservation at: marketing@vincchihoteles.com, to one of the persons who, meeting the requirements and accepting the conditions set out in these rules, participates in this draw.

Hereinafter, the “**GIFT**” or the “**PRIZE**”.

4. MECHANICS

The promotion is a **RAFFLE**.

A random draw will be held via EasyPromos among all those who have participated by:

- **Uploading a story to their Instagram profile (the profile must be public) with their photo at the INSTAGRAM POINT set up at the Vincci Hotels stand at FITUR, correctly tagging @vinci_hoteles and using the hashtag #instagrampoint. Only stories posted by users with a public profile will be valid.**

Once the promotion has ended, all entries that have met these requirements will be considered to choose the winner. A single random draw will be held among all participants via the EasyPromos platform, resulting in one winner and three alternates.

During the week 26th of January, the name of the winner will be announced on Vincci Hotels' Instagram story, and the winner will be contacted via private message. **If the winner has not responded by 10:00 a.m. on Friday, 6 of february, the prize will be awarded to the next participant on the list, and so on with the three alternates.**

Similarly, Vincci Hotels reserves the right not to consider for the draw any stories that do not conform to the company's philosophy, are considered offensive to other users, or do not comply with the legal terms and conditions of this draw. It will be understood that, at the time of uploading said story, the user expressly accepts these Terms and Conditions and the Privacy Policy of VINCCI HOTELS for said action.

5º.- SPECIFIC CONDITIONS OF THIS PROMOTION.

- The GIFT will be sent to the winner via email, with a personalised voucher to redeem. To enjoy the GIFT, the winner must first contact us by email **to make a reservation at: marketing@vincihioteles.com, subject to the availability conditions of the hotel selected to enjoy the gift.**
- The GIFT can be redeemed until 31 December 2026.
- The GIFT is worth a total of approximately EUR 300. In accordance with applicable regulations,

the prize has a tax value of EUR 300. **The GIFT does not include**

any extra expenses: travel, extra services, meals, etc.

- None of the components of the GIFT may be exchanged for their cash value, nor may a change of gift be requested. Nor may they be transferred to persons other than the winner of the draw, nor enjoyed by anyone other than the winner of this draw and a companion.

6. PROTECTION OF PERSONAL DATA.

Vincci Hoteles S.A. is committed to protecting the privacy and rights of its

customers and users, and in this regard, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation-GDPR), we hereby inform you of the following:

Data controller: VINCCI HOTELES S.A. (hereinafter, VINCCI HOTELES) Tax ID number: A-82919945

Registered office: Calle Anabel Segura, 11, Edificio C, Bajo, Centro de Negocios Albatros, Alcobendas, 28108 Madrid, Spain

General contact email address: info@vincchoteles.com

Contact address for the Data Protection Officer: dpd@vincchoteles.com

SOURCE OF THE DATA: The personal data we process at VINCCI HOTELES comes from the data subject themselves, who provides it voluntarily in order to participate in the prize draw.

PURPOSES: The purpose is the proper management and running of the prize draw, to determine the winner, and to manage the prize. No automated decisions will be made based on the data provided.

LEGITIMACY OF THE PROCESSING: The legitimacy of the processing comes from the express, explicit and informed consent that is determined by voluntary participation in the prize draw.

The winner of the prize also establishes a contractual relationship with the Data Controller for the fulfilment of the terms and conditions of the prize draw and the enjoyment of the prize.

The contractual relationship is established by the acceptance of the prize, so the processing carried out from the moment of acceptance of the prize is covered by the execution of the contract established between both parties.

CONSENT: participation in the prize draw is the means of expressing unequivocal consent for the legitimacy of data processing for the purposes set out in this privacy policy.

DATA RETENTION: The data of non-winning participants will be deleted once a winner has been designated and has accepted the prize.

The winner's data will be retained for the duration of the contractual relationship and for the subsequent period until any potential liabilities established in current legislation expire.

DATA RECIPIENTS: Personal data will not be transferred to third parties except as provided for in applicable legislation.

The winner's data will only be transferred to third parties involved in the management of the processes to determine the winner of the prize, acting in their capacity as Data Processors.

RIGHTS: Data subjects have the right to know that at VINCCI HOTELES we process their data in accordance with the purposes already specified in the Privacy and Data Protection Policy of which this section forms part.

You have the right to access your personal data and to rectify it if it is inaccurate.

You have the right to request the deletion of your data when, among other reasons, the data is no longer necessary for the purpose for which it was collected.

In certain circumstances, interested parties may request the limitation of the processing of their data, which will be kept solely for the exercise of the right of defence against claims and/or litigation, and for the legal periods required for its retention.

In certain circumstances, interested parties may object to the processing of their data. In this case, VINCCI HOTELES will stop processing your data, with the sole exceptions of legitimate reasons, for historical, artistic or research reasons, for defence against claims, or as provided for in current regulations.

You have the right to contact VINCCI HOTELES at the above address to request clarifications, make enquiries, suggestions or complaints, or to exercise the rights set out in this Extended Data Protection Information.

You also have the right to obtain further information and make any enquiries or complaints you deem appropriate to the Spanish Data Protection Agency (AEPD) at www.aepd.es at Calle Jorge Juan, 6 – 28001 – Madrid.

7º.- PERMANENT CONDITIONS OF ALL VINCCI

HOTELS THROUGH SOCIAL NETWORKS AND APPLICABLE TO THIS DOCUMENT WHERE

APPROPRIATE.

- VINCCI HOTELES reserves the right to justifiably remove any participant who defrauds, alters or disables the proper functioning and normal and regulatory course of this promotion.
- The prize will be awarded in accordance with current tax legislation applicable to Spanish territory. The prize will be delivered by emailing a personalised voucher once the winner's details have been verified. Vincci Hotels will only contact the winner of the draw directly via private message on social media, requesting their name, ID number, telephone number, address and email address. Account numbers or anything related to financial transactions will never be requested, nor will any links to any registration forms be provided.
- The personal data provided by participants in the promotion must be up to date, accurate and complete, as this is essential for the promotion to run smoothly. Otherwise, VINCCI HOTELES will be released from any obligation in this regard, as well as from any

consequences arising therefrom, including the declaration of the legitimate beneficiary of the promotion.

- By participating in the promotion, participants automatically and expressly consent to the data provided being used and processed for the purposes of participating in the promotion, for the management and delivery of the prize, in the event that you are awarded a prize, and for the fulfilment of any tax or other obligations applicable to this promotion. In relation to personal data protection, see clause 6 of the competition and/or prize draw rules.
- Participants also expressly acknowledge and accept that their participation in a promotion, draw or competition via Facebook, Instagram or the microsite means that their data may be viewed and shared by other Facebook and Instagram users. Likewise, participation in a promotion of this nature implies acceptance of the rules of Facebook and Instagram (depending on the channel used for the promotion).
- The data provided by participants must be accurate. Given that the data is essential for participation in this promotion, if it is found to be false, VINCCI HOTELES may remove the participant and, even if they win a prize in this promotion, it will not be awarded to them.
- Although the accuracy of the data provided, the organisers guarantee the management of any request arising from the exercise, by duly identified parents and/or guardians, of the rights of access, cancellation, rectification and opposition of the data of minors or incapacitated persons, if these have been collected, all in accordance with the information regarding the age provided by the participant.
- Provided that they are related to the promotion, and without any reimbursement of any kind for the participant, the latter consents to the use, worldwide and without limitation, by VINCCI HOTELES, S.A., of their image, name, photo, profile, etc., in any type of media, including the official Vincci Hotels page on Facebook, Instagram and the Internet in general.
- The personal data requested from participants in the draw is necessary and mandatory in order to participate in this promotion, and is protected in accordance with clause 6 of the rules of the competition to which it refers.
- Prizes awarded for participation in games, competitions, raffles, or alternative combinations linked to the sale or promotion of goods or services are subject to withholding or payment on account provided that the value of the prize exceeds three hundred (€300) euros, in accordance with the regulations of the Personal Income Tax.
- The identity of participants and winners will be verified exclusively by means of official documents for this purpose. Prizes are nominative and non-transferable, so if the winner(s) does/do not accept and/or renounce and/or do not qualify for them, the mechanisms established below will be used to award the prize. The prize will be announced on the official Instagram profile of Vincci Hotels and the winner will be asked to provide their email address, postal address, national identity card number and telephone number so that the prize can be sent to them. Similarly, if no response has been received from the winner by **FRIDAY 6TH OF FEBRUARY**, the prize will be awarded to the next participant selected from the list of substitutes.

- Use of the promotional gift is at the winner's own risk, and VINCCI HOTELES having any responsibility for such use, although it reserves the right to take action to safeguard its good image in the market.
- VINCCI HOTELES reserves the right to make changes or add annexes regarding the mechanics and prizes, provided that they are justified and do not harm the participants, and that they are duly communicated to them. By way of illustration, but not limited to, the possibility of changing the start and end dates of the promotion, the date of the draw, as well as the right to exchange the gifts for others of similar or greater value.
- The prize may be replaced by another of equal or greater value in the event of unavailability of the promotional gift due to stock depletion or for reasons beyond the control of VINCCI HOTELS.
- VINCCI HOTELES is not responsible for any loss, damage, theft, delays or any other circumstances attributable to third parties, unforeseeable circumstances or force majeure that may affect both participation in and enjoyment of the gift offered in this promotion.
- VINCCI HOTELES is exempt from any liability in the event of malfunction of electronic communication networks that prevent the normal development of the promotion for reasons beyond the company's control and especially due to external acts of bad faith. VINCCI HOTELES shall also not be liable for transmission problems or loss of data not attributable to it. It is also exempt from any responsibility for the malfunctioning of the postal service in cases where the prizes for this promotion are sent by this means. VINCCI HOTELES is not responsible for any damages that may arise from participation in the draw.
- Employees of VINCCI HOTELES and their immediate family members are not eligible to participate in the promotion.
 - For any dispute that may arise from the interpretation or execution of these rules, the parties submit to Spanish law and the jurisdiction of the courts and tribunals of Madrid.
 - Participation in this promotion implies full acceptance of these legal rules