

Privacy Policy

Last updated: 24 December 2025

1. Identification of the Data Controller

Although Lighthouse Intelligence Ltd. is the contracting party for the service, THE HOTELS NETWORK, S.L. ("THN") acts as the data controller for the processing described in this Privacy Policy.

This Privacy Policy describes how personal data may be processed by THN when you use the THN ChatGPT App through the OpenAI Marketplace, as well as your rights and how to exercise them.

At THN, we are committed to protecting and respecting your privacy. Our activity is carried out in compliance with Regulation (EU) 2016/679 ("GDPR") and Organic Law 3/2018 ("LOPDGDD") (together, the "Data Protection Regulations").

Data Controller:

THE HOTELS NETWORK, S.L.

Registered Office: Carrer Muntaner, 262, 3^a, 08021 Barcelona, Spain

C.I.F.: B-65542714

Contact (privacy): privacy@thehotelsnetwork.com

2. Our Approach to Privacy

2.1 This Privacy Policy explains how THN collects and processes personal data when THN ChatGPT App transmits data to THN's systems in order to provide responses (for example, through external API calls), and how we protect that data.

2.2 THN ChatGPT App is accessed through the OpenAI platform. Your use of the OpenAI platform and your OpenAI account is governed by OpenAI's own terms and privacy policy. THN does not create or manage an account for you in connection with this application.

2.3 The content you submit in the chat ("Prompts") may contain personal data depending on what you choose to enter. We recommend that you do not include sensitive or confidential personal information in Prompts.

3. Who is responsible for the use of your personal information?

THN ChatGPT App is accessed through the OpenAI platform. OpenAI is responsible for operating the platform experience (including authentication and account security) under OpenAI's own terms and privacy policy. THN is the Data Controller for personal data processed by THN when THN ChatGPT App transmits data to THN through external integrations to generate responses and operate the service. THN does not access your OpenAI password or account security settings..

4. Use of THN ChatGPT App

To access the services provided through this application, the user must be previously logged into the OpenAI platform under their own terms of use. The legal basis for processing any information provided during a session is the execution of the service requested by the user. THN does not extract or have access to your name, email address, or profile picture from your OpenAI account; the only information processed is the content of the queries entered into the chat box ("Prompts") and the technical metadata strictly necessary to generate the response. Since THN does not issue access credentials, the user is solely responsible for maintaining the security of their OpenAI account, and any interaction will be attributed to the holder of said account. The user is advised not to share highly sensitive or confidential personal information within the chat interface, as such information is processed by THN, acting as the Data Controller, in order to provide the AI-generated response.

5. How long we keep your personal information

Unlike our standard B2B services, THN ChatGPT App on the OpenAI Marketplace operates under a principle of minimal retention to protect user privacy. Chat data is processed in

real-time to generate responses and is not stored in a persistent format linked to an identifiable natural person. Temporary technical logs, such as IP addresses and API request timestamps, may be retained for a maximum period of 30 days for the sole purpose of ensuring system security, debugging technical errors, and preventing fraudulent use of THN's infrastructure. Data processed through our sub-processors (such as Tinybird or Pinecone) is stored in a mathematical (vector) or aggregated format, used exclusively for AI performance optimization without the possibility of identifying you personally. Since there is no personal profile or account created within THN, no formal account closure process is required; ceasing use of the service or removing the GPT from your OpenAI interface effectively terminates the relationship with the product.

6. Recipients of personal information

In some cases, and only when necessary, THN will provide user data to third parties. However, the data will never be sold. External service providers (e.g., hosting providers) with whom THN works may use the data to provide the corresponding services, but they will not use this information for their own purposes or for transfer to third parties.

THN endeavors to ensure the security of personal data when sent outside the company and ensures that third-party service providers respect confidentiality and have appropriate measures in place to protect personal data. These third parties are obliged to ensure that the information is processed in accordance with data privacy regulations. In some cases, the law may require personal data to be disclosed to public bodies or other parties; only what is strictly necessary for the fulfillment of such legal obligations will be disclosed.

The following have been appointed as sub-processors by THN in accordance with Article 28 of the Regulation:

1. **Amazon Web Services:** For the provision of infrastructure services such as servers, databases, and storage, necessary for the technical operation of our solutions. The information is stored on their servers located in Ireland (Dublin).
2. **Tinybird:** Real-time data platform to ingest massive amounts of data and transform it into high-performance, low-latency REST APIs using SQL. The information is stored on their servers located in Ireland (Dublin).

Likewise, THN may communicate anonymized or aggregated insights to third-party hotels regarding user interests or trends to improve commercial collaboration.

7. International data transfers

At THN, we endeavor to ensure that all processing of personal data takes place within the European Economic Area (EEA) and we avoid, as far as possible, any international transfer of data.

In the event that, exceptionally, it is necessary to transfer your data to a country outside the EEA that does not have an adequacy decision by the European Commission, we will ensure that the safeguards required by Chapter V of the GDPR are applied, including contractual guarantees and appropriate monitoring mechanisms.

You can request more information about the measures applicable to international transfers by writing to us at privacy@thehotelsnetwork.com.

8. Exercise of your personal rights

In accordance with the GDPR, you have certain rights when it comes to our processing of your personal data:

Right to be informed: You have the right to receive clear, transparent, and easily understandable information about how we use your personal data and your rights.

Right of access: You have the right to obtain access to your personal data.

Right of rectification: You have the right to have your personal data rectified if they are inaccurate or incomplete.

Right to erasure: This right allows you to request the removal or deletion of your personal data when there is no compelling reason for us to continue using them. This is not an absolute right to erasure, and exceptions apply.

Right to restrict processing: You have the right to "block" or suppress further use of your personal data. When processing is restricted, we may still store your personal data, but we cannot continue to use them.

Right to data portability: You have the right to obtain and reuse your personal data for your own purposes across different services.

Right to object to processing: You have the right to object to certain types of processing.

Right to lodge a complaint: You have the right to lodge a complaint about the way we handle or process your personal data before your national data protection authority.

Right to withdraw consent: If you have given your consent for anything we do with your personal data, you have the right to withdraw it at any time.

Right not to be subject to an automated decision: You have the right not to be the subject of a decision based solely on automated processing (including profiling) that produces legal effects (or of similar importance) for you.

You may direct your communications and exercise your rights by sending a written communication to the following email address: privacy@thehotelsnetwork.com. In some cases, the request may be denied if you request the erasure of data necessary for the fulfillment of legal obligations.

Please note that THN ChatGPT App is accessed through the OpenAI platform. OpenAI's processing (including any international transfers) is governed by OpenAI's privacy policy

9. Security measures applied to the processing of your data

At THN, we implement security standards to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information. We also apply security measures to guarantee the confidentiality, availability, and resilience of personal data processing systems.

We apply these same security standards or norms when working with commercial and technological partners. We only select and contract third-party processors and providers that have implemented adequate security measures and provide sufficient safeguards, including technical and organizational measures, to ensure the appropriate protection of the data we entrust to them.

10. Modification of the privacy policy

We may update this Privacy Policy from time to time. The “Last updated” date at the top indicates when changes take effect. Where appropriate, we will provide notice through the THN ChatGPT App listing or other reasonable means. We encourage you to review this Privacy Policy periodically