

## QUINTA DA COMPORTA

At Quinta da Comporta, privacy is at the heart of the Ultimate Hospitality Experience we pretend for our Guests. In line with the EU data protection legislation (GDPR) which enters into effect on 25 May 2018, we have updated the existing Privacy Policy notice to reflect our ongoing commitment to delivering unique and personalised experiences – whether in the emails we send or in the way we collect your data to always assure a personalised service into a lasting relationship with us.

When registering | singning-up on our future site, you will be asked to provide data, such a email and address, however, You have more control over your information. We are making it easier for you to control the information you provide us with. In line with the stronger rights provided by the new data protection laws, our *Online Privacy Notice* explains how you can make choices about the personal data we collect.

# Link : Online Privacy Policy

SUMMARY OF HOW WE USE YOUR DATA WHAT DOES THIS NOTICE COVER? INFORMATION WHICH WE MAY OBTAIN ABOUT YOU WHAT INFORMATION ABOUT YOU DO WE RECEIVE FROM THIRD PARTIES? WHAT WE DO WITH YOUR INFORMATION AND WHAT IS THE LEGAL BASIS FOR THIS USE? WHERE YOU GIVE US CONSENT DISCLOSURE TRANSMISSION OF PERSONAL INFORMATION OUTSIDE EU COOKIES AND SIMILAR TECHNOLOGIES WHAT RIGHTS DO I HAVE? WITHDRAW HOW LONG WILL YOU RETAIN MY DATA? QUERIES OR COMPLAINTS CONTACTING US AMENDMENTS

#### SUMMARY OF HOW WE USE YOUR DATA

What do we do with your information and what is the legal basis for this use? Quinta da Comporta uses your personal information to process and facilitate bookings, purchase gift voucher, book a restaurante, provide you with highly-personalised service at our Resort, respond to your requests for information, to improve our website with your feedbacks and information provided by you, improve our customer service, inform you of our products, services and booking | company up-dates by sending periodic e-mails and other purposes as set out in this notice.

Consent: Where we rely on your consent, such as for marketing our products and services to you, use of cookies, and collection and use of your sensitive personal data, you may withdraw this consent at any time.

Cookies: Our site uses cookies to track visitors using our site, analyse trends and usage patterns for research and marketing purposes. You are not obliged to accept cookies. More information is set out in the "Cookies and Similar technologies" section.

Your rights: You have certain rights to your personal information under applicable laws, including a right to object to some of the processing which Quinta da Comporta carries out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

#### WHAT DOES THIS NOTICE COVER?

This is the Privacy Notice of Quinta da Comporta. It describes how we will make use of all Personal Information which you provide to us.

Please read this page carefully before you start to use this site. If you do not wish to be bound by this Privacy Notice then you should not access this site. Where permitted by law, access of this site by you shall be deemed to be your acceptance of this Privacy Notice and your agreement that we may process and use your personal information in accordance with this Privacy Notice.

If you have any queries regarding this Privacy Notice or complaints about our use of your information please contact us at "dataprotection@quintadacomporta.com" and we will do our best to deal with your complaint or query as soon as possible.

## INFORMATION WHICH WE MAY OBTAIN ABOUT YOU

The types of personal information we may collect and process from you include:

your contact information (e.g., name, telephone number, email address, postal address);

your financial information (e.g. credit card number, security code, expiration date);

information related to your travel profile (e.g., accommodation and travel preferences, booking history, special health accommodations);

if you contact us, we may keep a record of that communication and any communications and correspondence with you; and information about your computer, including where available, your IP address, operating system and browser type, for system administration and security reasons and to collect aggregate information. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

WHAT INFORMATION ABOUT YOU DO WE RECEIVE FROM THIRD PARTIES?

You may receive information about you from third parties, example: from travel agents, tour operators and destination management companies whom you have direct contact.

The information we collect from such third parties include your contact information and information related to your travel profile.

WHAT WE DO WITH YOUR INFORMATION AND WHAT IS THE LEGAL BASIS FOR THIS USE?

We may use the personal information you supply to us via our site for the following purposes:

To fulfil a contract: this is relevant where you make bookings with us. This includes, for example:

Processing and facilitating bookings, including verifying your identity, taking payments and communicating with you;

Responding to requests which you have submitted via our site and to deal with on-going matters relating to such requests;

Presenting content from our site in the way that we consider most effective;

Providing you with highly-personalized service at our Resort and presenting you with information relating to Quinta da Comporta Resort;

If you provide a credit or debit card as payment, we use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud (see data sharing below);

Monitoring customer accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;

Using information you provide to investigate any complaints received from you or from others, about our website or our products or services;

Using data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation);

#### WHERE YOU GIVE US CONSENT

Providing you with travel-related information, information relating to Quinta da Comporta Resort or promotional details about products and services that may be of interest to you, as well as personalized mailings (electronic or otherwise) or other communications;

Placing cookies and using similar technologies in accordance with the "Cookies and Similar Technologies" section and the information provided to you when those technologies are used;

On other occasions where we ask you for consent, we will use the data for the purpose which we explain at the time.

For purposes which are required by law, such as:

In response to requests by government or law enforcement authorities conducting an investigation.

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to reject direct marketing at any time. You can do this by contacting us using the details set out in "Withdraw" section below.

# DISCLOSURE

In some cases we may be required to disclose your personal information to comply with legal requirements and requests from government agencies if required for the purposes set out above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws. We may also disclose your personal information to third parties:

Who provide us with payment related, data management and profiling, analytics, advertising or other services in order to process your bookings, provide information about tailored and individualized services/offers including on social media, and provide you with any information that you have requested;

Where we consider that we need to in order to comply with any law or regulation, where we suspect that any criminal offence may have been committed, to protect our rights, property or safety or that of others and in any circumstances where we consider that we are permitted to do so by law or regulation; and where that third party is a professional adviser to us.

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

Our site may contain links to other websites belonging to third parties. We do not control the privacy practices of these other websites. You should therefore make sure when you leave our site that you have read that website's Privacy Notice.

## TRANSMISSION OF PERSONAL INFORMATION OUTSIDE EEA

The information you provide to us may be given to our third party service suppliers outside the European Economic Area for the purpose of delivering the personalized services and communications stated above. Quinta da Comporta Resort will always take steps to ensure that your information is used by third parties in accordance with this Privacy Notice and that your information is kept secure at all times. In particular, in relation to any transfer to a third party in a country that is not subject to an adequacy decision by the EU Commission, such transfer will be appropriately protected through mechanisms such as EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification. https://www.privacyshield.gov/Program-Overview.

Where permitted by law, if you do not consent to this transfer, then please do not register on our site as we will be unable to provide you with our services.

## COOKIES AND SIMILAR TECHNOLOGIES

Our site uses cookies or similar technologies. We alert and ask the visitor for permission to gather anonymous analytical data in order to better understand user behaviour in our websites. We alert about the usage of cookies when you enter our website. We also fully respect DNT («Do Not Track») requests. The website www.allaboutcookies.org contains step-by-step guidance on how cookies can be switched off by users.

By using our site without disabling cookies via your browser settings you are consenting to our use of cookies and similar technologies as described in this notice.

Please note that our advertisers and third party partners may also use cookies. These parties may use so-called "third party" cookies so that they can track your response to their adverts and/or identify you on any other website that you visit which also contains their adverts. Please refer to their Privacy Notice for further details.

## WHAT RIGHTS DO I HAVE?

In accordance with applicable laws, you may have rights in relation to your personal information. Such rights include:

You have the right to ask us for a copy of your personal information; to correct, delete or restrict processing of your personal information; and to obtain the personal information you provide to us for a contract or with your consent in a readable format.

In addition, you can object to the processing of your personal information in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing (see below "WITHDRAW").

These rights may be limited, for example if fulfilling your request would reveal personal information about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in applicable data protection laws. We will inform you of relevant exemptions we rely upon when responding to any request you make.

#### WITHDRAW

If you do not wish to remain on our database and to receive our personalized mailings (electronic or otherwise) or other communications, please note that you may withdraw of our database by using the "Unsubscribe" option at the foot of our email communications, or by sending an email to our responsible - dataprotection@quintadacomporta.com.

## HOW LONG WILL YOU RETAIN MY DATA?

Where we process personal information for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to

send you direct marketing or to process your data so that we can respect your request in future.

Where we process your financial information, we will only keep the information for as long as necessary for the purpose/s for which it is collected and up to two months thereafter.

In relation to all your other personal data including registration data, we will not retain your data for longer than required for the purposes indicated above, and will delete personal data if they are no longer necessary for the purposes for which they are collected or otherwise processed, unless we are required to keep the data to comply with applicable legal obligations.

#### QUERIES OR COMPLAINTS

If you have any queries or complaints regarding this Privacy Notice or use of your personal information please contact our responsible - dataprotection@quintadacomporta.com".

#### CONTACTING US

If there are any questions regarding this privacy policy, you may contact us using the information below.

https://quintadacomporta.com

Support Contact: Lisabete Baptista (Privacy Policy Manager in charge)

Email: dataprotection@quintadacomporta.com

Tel: +351 211 119 910

Address:

Quinta da Comporta - Wellness Boutique Resort

Rua Alto de Pina

7570 – 779 Carvalhal - Grândola - Portugal

#### AMENDMENTS

We may update this Privacy Notice if necessary, you will be notified of any material changes using the email address you have provided upon registration or by an announcement on the site. The changes will apply to the use of the site after such notice. Where permitted by law, if you use the site after the date on which the changes come into effect, you will be deemed to have accepted the new Privacy Notice.

Last update of the Policy, the 25 May 2018.