

## *Privacy Policy / Privacy Notice*

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*JUNE 2018 VERSION*

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### **Portugal Travel Team**

**LISBON OFFICE:** Rua Damasceno Monteiro, 39 A - 1170-110 Lisboa - Portugal Tel: +351 21 816 1600 // Fax: +351 21 816 1609

[ptt.lisbon@portugal-travelteam.pt](mailto:ptt.lisbon@portugal-travelteam.pt)

**ALGARVE OFFICE:** Ed. Encosta das Figuras, lote 33-A, loja C - 8005-541 Faro - Portugal Tel: +351 289 870 550 // Fax: +351 289 865 617

[ptt.faro@portugal-travelteam.pt](mailto:ptt.faro@portugal-travelteam.pt)

EQUIPA DE TURISMO, Viagens e Turismo, S.A. Sociedade Anónima, Matriculada na CRCF sob o N° 3863/980831 - Capital Social: Eur. 103.000  
Contribuinte N° 503 704 253 - Licença RNAVT 2182



## Index

|  |     |
|--|-----|
| <b>1. Introduction</b> .....   | 3   |
| <b>2. What Personal Data do we collect?</b> .....                        | 3   |
| <b>3. How we collect Personal Data?</b> .....                            | 5   |
| <b>4. How do we use Personal Data?</b> .....                             | 6   |
| <b>5. What personal information is disclosed to third parties?</b> ..... | 8   |
| <b>6. What Personal Data are transferred abroad?</b> .....               | 100 |
| <b>7. Information security</b> .....                                     | 111 |
| <b>8. Rights in relation to the Personal Data we collect</b> .....       | 111 |
| <b>9. Integrations with Social networks</b> .....                        | 122 |
| <b>10. IP Addresses</b> .....  | 133 |
| <b>11. Tracking Technologies / Cookies</b> .....                         | 144 |
| <b>12. Associated websites</b> .....                                     | 14  |
| <b>13. Feedback / Claims / Contact</b> .....                             | 14  |
| <b>14. The changes to notice</b> .....                                   | 15  |
| <b>15. Document control</b> .....  | 15  |
| <b>Distribution list</b> .....   | 15  |

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## 1. Introduction

This Privacy Notice ("Notice") establishes how Portugal Travel Team Protects the privacy of the Personal Data of our employees, customers, partners, or any other entity with which Portugal Travel Team relates in the context of its activity.

Being a Destination Management Company, Portugal Travel Team needs to collect, use, and disclose Personal Data to perform the functions and business activities, including carrying out and managing services on behalf of our clients. In Portugal Travel Team we are committed to protecting the privacy and confidentiality of Personal Data and to maintain the various physical, digital, human and process related controls.

In the context of the General Data Protection Regulation 2016/679 ("GDPR") Portugal travel Team is a "data controller" of any personal information that is shared in the context of our relationship with our clients or other interested parties.

By providing us Personal Data, stakeholders agree that this notice applies to how we deal with Personal Data and consent that Personal Data is collected, used, and disclosed as detailed in this Notice. If stakeholders do not agree with all or part of this Notice, the stakeholders should not provide us their Personal Data. If stakeholders do not provide us their Personal Data or withdraw their consent according to this Notice, that could affect our ability provide the services or negatively affect the quality of services provided. There may be cases where local data protection laws impose treatment practices more restrictive than the practices defined in this notice. When that occurs, we will adjust our data processing practices to comply with these local laws data protection.

## 2. What Personal Data do we collect?

Personal Data have the meaning given by the local data protection laws and, where the GDPR applies, the meaning given under the GDPR. Personal Data usually means data related with a living individual who can be identified from that data; or is identifiable from the combination of that data and other available data.

Generally, the type of personal information we collect is necessary to facilitate travel arrangements, support reservations or to arrange services and / or products relating to travel on behalf of our clients.

In this regard, we usually process the following types of Personal Data about our customers:

- Contact information (such as name, home address / correspondence, telephone number, email address);

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- Payment data;
- Passport detailed data;
- Data on dietary needs and health problems (if any);
- Other details relevant to the travel plans or required by the relevant travel service provider(s) (e.g. catering companies, restaurants, providers of accommodation or transportation).

When our customers contact us for other purposes, Personal Data related to those purposes may also be collected. We also collect data necessary for use in the business activities of Portugal Travel Team and our related entities, including, for example, financial details required to process multiple transactions, video surveillance images used for security purposes, or other relevant Personal Data you may choose to provide us.

In some circumstances, we may collect Personal Data from our customers that may be considered sensitive data in accordance with local data protection laws. Sensitive data may include (without limitation) racial or ethnic origin, philosophical or religious beliefs or affiliations, sexual preferences or practices, criminal history and the alleged commission of an offense, affiliation to political, professional, or commercial associations, biometric and genetic information, financial data, and health data. We will only collect sensitive data in accordance with local data protection laws, with explicit consent of the subject and where the data is reasonably necessary or directly related to one or more of our functions or operational activities, unless required or permitted to do so by law. To the extent permitted or required by local data protection laws, our customers consent that we use and disclose your sensitive data solely for the purpose for which it was collected, unless we subsequently receive your consent for another purpose. For example, if our clients provide us with health information related to personal injury insurance for activities that they wish to do, customers consent that we use and disclose such health information on their behalf in the contacts made with the entity that promotes such insurance. We will not use sensitive data for purposes other than those for which it was collected, unless we receive consent for another purpose.

### 3. How we collect Personal Data?

We will only collect Personal Data in accordance with local data protection laws. We generally collect Personal Data in the context of contacts with our customers. We will collect this data directly from our customers, unless it is unreasonable or impractical to do so.

Generally, this collection will occur when customers:

- contact us in person, by phone, letter, e-mail;

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- visit us through our website; or
- contact us through social networks.

We may also collect Personal Data when:

- purchase or ask questions about event organization or other products and services;
- sign up to receive marketing communications (for example, e-newsletters);
- request leaflets or other information

Unless they choose to do so under a pseudonym or anonymously, we may also collect Personal Data from our customers in the context of surveys or when they provide feedback.

In many circumstances, it may be necessary to collect Personal Data from our customers from third parties. When this happens, we have the authority of the person making the event reservation to act on behalf of all the participants, as well as with the consent of that person to collect, use and disclose Personal Data in accordance with this Notice. Our clients should inform us immediately if they know that their personal information has been provided to us by another person without their consent or if they have not obtained the consent before providing us with the Personal Data of another person.

We make every effort to maintain the accuracy and completeness of the Personal Data we store and to ensure that all Personal Data is up-to-date. However, any interested party may contact us immediately if there is any change to their Personal Data or if they are aware that we have inaccurate Personal Data (see section 13 below). We will not be liable for any losses arising from any inaccurate, defective, or incomplete personal information that the Interested Parties, or anyone acting on your behalf, may provide to us.

#### 4. How do we use Personal Data?

We will only process Personal Data when:

- Consent has been given for such processing (which may be withdrawn at any time, as detailed in section 8 below);
- Processing is necessary to provide our services;
- Processing is necessary for compliance with legal obligations; and / or
- Processing is necessary for our legitimate interests or for any third party receiving Personal Data (as detailed in sections 5 and 6 below).

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When you contact us regarding an inquiry or event reservation, the purpose for which we collect your personal information is generally to provide you with advice and / or to help you book event-related products and services. However, the purpose of the collection may be different depending on the specific circumstances disclosed in this Notice.

When a customer makes a reservation or organizes event-related products and services with our support, we generally act as an agent for event service providers (e.g. for a hotel). In this case, we process Personal Data as necessary to provide the requested services. This usually includes the collection of Personal Data for internal purposes as described in this Notice, and for the event service provider for whom we act as an agent (for example, to provide contracted services). For example, if you book a venue through Portugal Travel Team, we will use the Personal Data to allow the venue to be booked and we will disclose the Personal Data to the venue to allow it to provide the event service.

We may share data with our event service providers (hotels, venues, catering companies or other providers related to the event reservations). These event service providers may also use the Personal Data as described in their respective privacy policies for additional information that facilitates the providing the services requested. We recommend that our Customers review the privacy policies of any event related service providers that are booked through Portugal travel Team. We will provide copies of all relevant terms, conditions, and privacy policies of the event related service providers upon request.

We act as agents for or on behalf of many event service providers worldwide, so it is not possible to refer in this Notice to all the event service providers for which we operate (in particular their locations). For more information on disclosure of Personal Data to event service providers located outside the GDPR context, see section 6 below.

If there is any concern regarding the transfer of Personal Data to an event service provider, or if further information is required, please refer to section 13 of this Notice.

The purposes for which we collect Personal Data also include:

- identification of fraud or errors;
- legal or regulatory compliance;
- develop and improve our products and services;
- maintaining or improving the relationship with our Clients, namely by creating and maintaining a customer profile that allows the delivery of a service aligned with their preferences;

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- market research, customer satisfaction assessment and feedback on the services we provide;
- facilitate the participation of our Clients in loyalty programs;
- analysis related to our business and services, including, but not limited to, sales and travel destination preference trends;
- internal organization and accounting;
- compliance with applicable legal obligations or applicable customs / immigration requirements related to travel; and
- other purposes as authorized or required by law (e.g. to prevent a life threatening, health or safety protection, or to enforce the legal rights of Portugal Travel Team).

Where permitted by local data protection laws, we may use Personal Data to perform marketing activities related to our (and third party) products and services that we believe may be of interest to our Customers, unless they have requested to not receive such data. information. These campaigns may include, but are not limited to, email submissions, digital marketing, and other electronic notifications. Personal Data will be used to send digital marketing material (including e-newsletters, e-mail, SMS, MMS, and IM) if the Customers have chosen to receive it. Customers can sign up to receive e-newsletters and other promotional / digital marketing materials by following the relevant links on our website or requesting that one of our collaborators do so.

Any individual who does not wish to receive promotional / marketing material from us, participate in market consultations or receive other types of communication should refer to sections 8 and 13 of this Notice.

## 5. What personal information is disclosed to third parties?

At Portugal Travel Team we do not sell, rent, or exchange Personal Data. Personal Data will only be disclosed to third parties in accordance with the provisions of this Notice and in accordance with local data protection laws (note: in this Notice the reference to "disclosing" includes transferring, verbal, or written sharing, sending, or making available data to another person or entity).

Personal Data may be disclosed to the following types of third parties:

- contracted entities, suppliers, and service providers, including:
  - in each of the circumstances described in section 4 ("How do we use Personal Data?");

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- providers of ICT solutions that support us in delivering products and services (such as any external data-hosting providers we can use);
- publishers, printers, and distributors of marketing material;
- organizers of events and exhibitions;
- marketing or market consulting agencies;
- courier services or courier services; and
- external consultants (such as lawyers, accountants, auditors, or recruitment consultants);
- event service providers such as transportation companies, restaurants, airlines, teambuilding companies, activities designers, hotels, catering companies, historical venues, transfer managers and other related service providers;
- any third party to whom we assign or transfer any of our rights or obligations;
- contact persons (for example, a family member) when our Customers are not contactable, and the contact is in our opinion of Customer's interest (e.g. where the person is concerned about their well-being or needs acting on behalf of Customer due to unforeseen circumstances);
- as required or authorized by applicable law, and to comply with the legal obligations of Portugal Travel Team;
- customs or immigration services to comply with applicable legal obligations in the context of travel;
- government agencies or public authorities to comply with valid and authorized requests, including court orders or other valid legal process;
- regulatory authorities or law enforcement authorities, including for fraud protection and related security purposes; and
- supervisory agencies where there is suspicion of illegal activity and that the Personal Data are a necessary part for investigation or denunciation of the subject.

In addition to the above, we will not disclose personal information without consent, unless we believe disclosure is necessary to reduce or prevent a threat to life, health or safety of an individual, public health or safety, or for an action (e.g. prevention, detection, investigation, or punishment of criminal offenses), or where such disclosure is authorized or required by law (including applicable data protection / privacy laws). On the websites or social networks of Portugal Travel Team users may choose to use certain third-party resources with which we associate. These features, which may

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include social networking tools and geo-localization, are operated by third parties, and are clearly identified as such. These third parties may use or share Personal Data in accordance with their own privacy policies. We recommend consulting third-party privacy policies if you consider these relevant tools.

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## 6. What Personal Data are transferred abroad?

We may disclose personal information to certain recipients abroad as described below. We will ensure that such international transfers are necessary for the execution of a contract between our Customers and third parties abroad or that are subject to appropriate or adequate safeguards as required by local data protection laws (e.g. GDPR). We will provide copies of the relevant safeguards documents upon request (see section 13 below).

It is possible that Personal Data are transferred for a foreign entity located in a jurisdiction where it is not possible to guarantee a data protection level equal to that in the context of GDPR. In these cases, Portugal Travel Team cannot be responsible for how these recipients handle, store, and process your Personal Data.

### (a) Related entities abroad

Portugal Travel Team may be requested to operate an event abroad by a customer, in any country outside of Portugal. Personal data may be disclosed with our related entities abroad for support in the event organization and / or to enable administrative, consultative, or technical services, including the storage and processing of such data.

### (b) Travel service providers located abroad

To provide our services, it may be necessary for us to disclose personal data to relevant suppliers of event or travel related services abroad. Relevant event and travel service providers will in most cases receive personal data in the country in which they will provide the services or on which their business is based.

### (c) Our service providers located abroad

We may also have to disclose personal data to service providers located abroad for supporting the provision of services, including the storage and processing of such data. Generally, we will only disclose personal information to such recipients abroad in the context of an event or travel reservation and / or to allow the provision of administrative and technical services provided on our behalf.

If there is any specific doubt as to where or for whom personal data can be sent, see section 13 of this Notice.

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## 7. Information security

At Portugal Travel Team we are committed to protecting Personal Data by implementing and maintaining appropriate technical and organizational control measures to ensure a level of safety aligned with the risks related to: accidental or illegal destruction; loss; unauthorized alteration or disclosure; or improper access to Personal Data transmitted, stored, or processed. Portugal Travel Team regularly monitors and reviews security controls and strives to protect Personal Data in the same way that it protects sensitive Business Information.

Portugal Travel Team destroys or de-characterizes Personal Data whenever they cease to be relevant to the business or as required by law.

## 8. Rights in relation to the Personal Data we collect

Should any interested party that Portugal Travel Team has Personal Data intend to:

- update, modify, delete, or obtain a copy of Personal Data; or
- restrict or prevent Portugal Travel Team from using any personal information, including withdrawing any consent you have previously given for the processing of such information; or
- obtain a copy of personal information that has been processed based on the consent or as required to perform a contract.

Interested parties must formally submit the request to Portugal Travel Team through the contacts identified in section 13 of the Notice. After the request an acknowledgment will be given of the same and information will be given on the deadline within which the information will be made available.

Portugal Travel Team will make every effort to respond to such requests within one month or less, although it may be necessary to extend this period for complex requests.

In addition, Portugal Travel Team reserves the right to deny access to the Information for any reason permitted by applicable law. If the request for access or correction of the Information is denied, the reasons for such refusal will always be communicated in writing, unless it is unreasonable to do so or when required by local data protection laws.

All communications related to requests for access to Personal Data must be made formally in writing to the Data Protection Officer through the contacts indicated in section 13 of the Notice.

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If Portugal Travel Team is requested to restrict or stop using Personal Data, withdrawing the consent previously provided for the processing of Personal Data, the ability to provide services or the quality of services may negatively impact the services. For example, most travel reservations must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details), and reservations cannot be made without this information.

Personal Data shared with Portugal Travel Team should be accurate and individuals agree to update them whenever necessary. In addition, they agree that, in the absence of any update, Portugal Travel Team may assume that the submitted data is correct.

Any individual may at any time ask Portugal Travel Team to stop sending marketing communications and may use the cancellation links provided in the marketing emails or through the contacts indicated in section 13 Notice.

In any of the situations listed above, it may be requested to provide a valid means of identification that the applicant proves his / her identity and thus ensure that Portugal Travel Team fulfils its security obligations and prevents the unauthorized disclosure of Personal Data.

Portugal Travel Team reserves the right to charge a reasonable administrative fee following any manifestly unfounded or excessive requests regarding access to Personal Data or for any additional copies of Personal Data requested.

## 9. Integrations with Social networks

Portugal Travel Team websites and mobile applications can use social networking features and tools (like "Like" and "Share" buttons), ("Social Networks Resources"). These features are provided and operated by outside companies (for example, Facebook) and hosted by outside companies or directly on our website or mobile application. Social Networks Resources may collect data related to the page visited on the website / mobile application, the IP address and may set cookies to allow the RS Feature to function properly.

If the user has activated social networking accounts, then they may be able to share data about visiting and using our website or mobile application with social network accounts. Likewise, interactions with RS resource can be registered by third parties. In addition, the external company may share with Portugal Travel Team personal data in accordance with its policies, such as your name, profile picture, friend lists or any other information you have chosen to make available, and we may share data with the outsourced company for promoting the marketing directed through the platform of social networks. Users can manage data sharing and turn off targeted marketing in the privacy settings of their social networks.

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All interactions with Social Networks Resources are governed by the privacy policy of the external company that provides them. More information on the data protection practices of these companies should be consulted directly in the privacy policy of these companies.

## 10. IP Addresses

When a user accesses the website, uses any mobile device or digital matches of the Portugal travel Team servers, they can record data relating to the device or network that the user uses, including the IP address. An IP address is a series of numbers that identify a computer and are usually assigned when you access the Internet.

IP addresses can be used by Portugal Travel Team to administer systems, investigate security issues and compile anonymous data about the use of the website and / or mobile applications. IP addresses may also be associated with other personal data available about individuals for the purposes described above (for example, to better tailor marketing and advertising materials, provided the user has chosen to receive digital marketing).

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## 11. Tracking Technologies / Cookies

Portugal Travel Team may use web analytics services from outside vendors on their websites and mobile applications, such as those listed in the "Cookies Policy". Providers of these services may use technologies such as cookies and web beacons to help analyse visitors using websites and applications.

For information on the use of cookies and tracking technologies please refer to the Portugal Travel Team Cookies Policy.

## 12. Associated websites

The Portugal Travel Team websites may contain links to third-party sites over which the Portugal Travel Team has no control, is not responsible for the privacy practices or the content of any associated websites. Portugal Travel Team recommends reading the privacy policies of any associated websites that are visited, as their privacy policies and practices may be different from those of Portugal Travel Team.

## 13. Feedback / Claims / Contact

Any questions, comments, or complaints about this Notice or about the processing of personal data; if you wish to inform Portugal Travel Team about a change or correction of personal data; if you wish to receive information about the personal data that are treated by Portugal Travel Team; or for any claim or comment related to data protection; should be addressed to the Data Protection Officer of Portugal Travel Team through the contacts below:

Contact Name: Eduarda Neves

The email: [eduarda.neves@portugal-travelteam.pt](mailto:eduarda.neves@portugal-travelteam.pt)

Address: Rua Damasceno Monteiro, 39 A, 1170-110 Lisboa, Portugal

Portugal Travel Team will respond to any queries or complaints received as soon as possible.

## 14. The changes to notice

This Notice may be changed from time to time. If a change to the Notice is made, the revised version will be published and dated on the < website. If justified, in addition to updating the Notice, consent may be requested for certain types of treatment.

Portugal Travel Team

**LISBON OFFICE:** Rua Damasceno Monteiro, 39 A - 1170-110 Lisboa - Portugal Tel: +351 21 816 1600 // Fax: +351 21 816 1609

[ptt.lisbon@portugal-travelteam.pt](mailto:ptt.lisbon@portugal-travelteam.pt)

**ALGARVE OFFICE:** Ed. Encosta das Figuras, lote 33-A, loja C - 8005-541 Faro - Portugal Tel: +351 289 870 550 // Fax: +351 289 865 617

[ptt.faro@portugal-travelteam.pt](mailto:ptt.faro@portugal-travelteam.pt)

EQUIPA DE TURISMO, Viagens e Turismo, S.A. Sociedade Anónima, Matriculada na CRCF sob o N° 3863/980831 - Capital Social: Eur. 103.000  
Contribuinte N° 503 704 253 - Licença RNAVT 2182



This Privacy Notice was last updated on May 25, 2018.

**Document control**

**Revision History / Changes**

| VERSION | DATE | AUTHOR | APPROVER | REVISION / CHANGE |
|---------|------|--------|----------|-------------------|
|         |      |        |          |                   |
|         |      |        |          |                   |

**Distribution list**

| Recipients |
|------------|
| <ENTIDADE> |

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END

**Portugal Travel Team**

**LISBON OFFICE:** Rua Damasceno Monteiro, 39 A - 1170-110 Lisboa - Portugal Tel: +351 21 816 1600 // Fax: +351 21 816 1609

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