

Privacy Policy

A. GENERAL PART

1.1. USER DATA COLLECTION AND PROCESSING

This Privacy Policy intends to give to the Users of the website hosted at www.algarvehome.pt, hereinafter referred as “Site”, detailed information on how AlgarveHome S.A., a public limited company with head office at Urb. Monte Canelas, 83, Mexilhoeira Grande, Portimão, Portugal, 8500-157, registered at the Lisbon Commercial Registry Office with the corporate taxpayer number _____, as personal data controllers or as data processors, process the personal data of the User.

As a rule, Personal Data is requested when the User registers or browses on the Site, requests a contact and/or sending newsletters, subscribes to a certain service, interacts with the chatbot, joins the Loyalty Program “AlgarveHome Club”, provides or requests information, acquires a product or service or establishes a contractual relationship with AlgarveHome, namely when he/she makes a reservation on one of our facilities.

The Personal Data collected and processed is generally the following: name, gender, date of birth, telephone, mobile phone, email, address, tax identification number, credit card data (collected for the payment purposes only), although other Personal Data may be collected if necessary or appropriate for the provision or billing services by AlgarveHome.

After the collection of Personal Data, AlgarveHome provides the User with detailed information about the nature of the data collected and about the purpose and processing that will be performed on the Personal Data, as well as the information mentioned in clause 8. AlgarveHome. also collects and processes information about the characteristics of the user’s hardware device, your IP and browser/software features, as well as information about the pages visited by the User within the Site. This information may include browser type, domain name, access times and links by which the User has accessed the Site (“Usability Information”). We use this information to improve the quality of the user’s visit to our Site and, when you give your consent, analyze your user profile and browsing habits on the Site, measure the conversion of advertising on the Site and send commercial and marketing information tailored to your profile.

Usability Information and Personal Data are designated in this Privacy Policy as “User Data”.

For the purposes of this Privacy Policy, a contractual relationship means any contract established between AlgarveHome and its related entities, regardless of their purpose.

1.2. THE RECIPIENTS OF THE PERSONAL DATA

The User Data collected by AlgarveHome is not shared with third parties without the User’s consent, except in the situations mentioned in the following paragraph. However, in the event of the User contracting services with AlgarveHome that are provided by other entities responsible for the processing of personal data, User Data may be transmitted or accessed by such entities, to the extent that it is necessary for the provision of such data services.

AlgarveHome may transmit or communicate the User Data to other entities in the event of such transmission or communication being necessary for the implementation of the contract established between the User and AlgarveHome or for pre-contractual procedures at the request of the User, if necessary for the fulfilment of a legal obligation to which AlgarveHome is subject or, if it is necessary, to obtain them in the legitimate interests of AlgarveHome or of a third party. In the event of the transmission of User Data to third parties, reasonable efforts will be made to ensure that the transmitting entity employs the User Data transmitted in a manner appropriate to this Privacy Policy.

When a User reserves a stay in one of our hotels, his/ her personal data will be processed by the UNICO Finance Management Company for assistance and support during the booking and accommodation in one of the properties. For the present purposes, AlgarveHome will transmit the

following personal data to the UNICO Finance Management Company, which will act as Data Controller: full name, nationality, date of birth, passport or citizen card number, country of origin, check-in date, check-out date. For more information on how UNICO processes your personal data, please consult <https://www.unicofinance.pt/PoliticaPrivacidade.pdf>.

I) Data Processors

As part of the processing of User Data, AlgarveHome uses or may use processors whose on its behalf, and in accordance with its instructions processes the User's Data, in accordance with the law and this Privacy Policy.

These processors may not transmit the User Data to other entities without the prior written authorization.

AlgarveHome undertakes to only subcontract the processors that have implemented the appropriate technical and organizational measures, to guarantee the defense of the User's rights. All entities sub-contracted by AlgarveHome shall be bound by AlgarveHome by means of a written agreement which covers: the object and duration of the processing, the nature and purpose of the processing, the type of personal data, the categories of data subjects and the rights and obligations of the parties and other obligations provided by the article 28 of GDPR.

We are listing below the processors' categories to which the personal data of the AlgarveHome website users and guests is communicated:

Processors Categories	Processing of Personal Data Purposes
Licensing, maintenance, support and technical software and systems technical support	Management / maintenance / systems and software support to the AlgarveHome's activity.
Payment service processing, EDI and electronic billing services, accounting, tax and administrative management companies and business support software	Economic and accounting management of the invoicing of the guests, suppliers, and service providers
Commercial Promoters	Promotion / Sale of AlgarveHome services
Direct marketing support companies / digital marketing partners	E-mail marketing sending assistance, performance and user profile analysis, and disclosure of publicity
Solutions providers and software providers	Sending of the guest satisfaction surveys
Security companies and preventive and corrective maintenance of security systems companies	Video surveillance and surveillance for the security of people and properties
Guest stay management companies	Services provision related to the stay of guests in the establishments of AlgarveHome
Provision of guest services companies	Guests contact and support

II) Third Parties:

AlgarveHoma can further communicate to other third parties not qualified as processors pursuant to the article 4 (8) of the GDPR. These entities are subject have ensured that they process personal data in accordance with the provisions of the GDPR.

AlgarveHoma communicates the data to other recipients, in detail:

Recipients Categories	Processing of Personal Data Purposes
Temporary-work agencies	Temporary transfer of workers
Companies that explore commercial establishments inside AlgarveHome	Supplementary services and support provided to guests
Insurance Companies	Customer Service Insurance

Companies providing various services during the guest's stay at the AlgarveHome facilities	Parking, car rental and garden maintenance services
Social Media Networks	Marketing campaigns
Travel agencies and tour operators	Reservations
Advisers or Lawyers	Provision of consultancy services and legal services
Different companies of additional services requested by guests	Taxi service / Transfers to the airport, Car parking services, car rental, restaurants reservations and other activities requested by guests

1.3. DATA COLLECTION CHANNELS

AlgarveHome may collect data directly (i.e., directly from the User) or indirectly (i.e. via partner entities or third parties). Such collection may be done through the following channels:

- Direct collection: in person, by telephone, e-mail and through the Site;
- Indirect collection: through partners or group companies and official entities.

2. GENERAL PRINCIPLES APPLICABLE TO THE PROCESSING OF USER DATA

In terms of general principles regarding the processing of personal data, AlgarveHome undertakes to ensure that the User Data processed by it is:

- Subject to processing in accordance with the law, as well as being fair and transparent in relation to the User;
- Collected for specific purposes that are objective and legitimate, not being processed subsequently in any way that runs contrary to these purposes;
- Appropriate, justified and limited to what is necessary in relation to the purposes for which these data are processed;
- Accurate and updated whenever necessary with all necessary measures being taken to ensure that inaccurate data, considering the purposes for which they are processed, are erased, or corrected without delay;
- Kept in a manner that allows the identification of the User only for the period necessary for the purposes for which the data are to be processed;
- Handled in a manner that ensures data security, including protection against their unauthorized or illegal treatment and against their loss, destruction, or unforeseen damage, with appropriate technical or organizational measures being taken.

Data processing carried out by AlgarveHome is permitted and legitimate when at least one of the following situations occurs:

- The User has given his/her free, positive, explicit and unequivocal consent to the processing of his/her for one or more specific purpose;
- The processing is necessary for the implementation of a contract in which the User is a party, or for pre-contractual procedures at the request of the User;
- The processing is necessary for the fulfilment of a legal obligation to which AlgarveHome is subject;
- Processing is necessary for the defense of the vital interests of the User or another individual;
- The processing is necessary for legitimate interests pursued by AlgarveHome or by third parties (unless the interests or fundamental rights and freedoms of the User requiring the protection of personal data prevail).

AlgarveHome undertakes to ensure that the processing of User Data is only done under the conditions cited above and respecting the principles mentioned above.

When the processing of the User Data is performed by AlgarveHome is based on the User's consent, the User has the right to withdraw his consent at any time. Such withdrawal of the consent, however, does not jeopardize the legality of the processing carried out by AlgarveHome, based on the consent previously given by the User. The length of time during which the data is filed and stored varies according to the purpose for which the information is being processed, being stored only for the necessary time for the fulfilment of the purposes for which they are processed, taking into account the Data Retention Policy approved by AlgarveHome.

Effectively, there are legal requirements that require the data to be preserved for a minimum period. Thus, and where there is no specific legal obligation, the data will be stored and kept only for the minimum period necessary for the purposes that led to their collection or subsequent processing, which at the end of the period will be eliminated.

3. USE AND PURPOSES OF THE DATA PROCESSING

In general, AlgarveHome uses the User Data for the following purposes:

- To provide hotel services and associated services (restaurants, bars, spa, etc.);
- To purchase and manage Vouchers;
- To manage the contacts with the User and response to request for quotes;
- To reply to questions asked in the Site's chatbot;
- To bill or to invoice the services;
- To inform the User, when requested, on new products and services that have been made available on the Site and/or in accommodation facilities, special offers and campaigns, updated information on AlgarveHome's business operations and, generally, for marketing purposes, using any means of communication, including electronic media;
- To participate in campaigns to collect contacts or contests in the social networks of AlgarveHome;
- To join the loyalty program ("AlgarveHome Club"), which allows access to restricted areas of the Site;
- To ensure that the Site meets the User's needs by developing and publishing content that is best adapted to the requests made and the type of User, improving the search capabilities and functionalities of the Site, and obtaining associated or statistical information regarding the user's profile (analysis of consumption and navigation profiles);
- To contract and to manage the assistance insurance available to all clients during their stay in AlgarveHome's accommodation facilities;
- To send guest feedback Surveys;
- To record phone calls made in connection with the solicitation or provision of information about reservations, vouchers, and other products or services and their commercial conditions of use and the establishment of any contractual relationship, either during the formation phase of the contract or while it is in force.

AlgarveHome may combine Usability information with anonymous demographic information for research purposes, and we can use the result of this combination to provide relevant content on the Site. In certain restricted areas of the Site, and through the Users' consent AlgarveHome can combine Personal Data with Usability information to provide the User a more personalized content.

4. LEGAL BASIS FOR SOCIAL DATA PROCESSING.

The processing of your personal data has the following purposes:

Processing Activity	Processing Purposes	Legal basis
	Booking and provision of hotel and associated services	Pre-contractual diligence or contract performance

Contractual Relationship Management		Legitimate interest if the subject is not part of the contract
	Recording of electronic communications by webchat within the scope of the contractual relationship	Consent
	Call recording within the contractual relationship	
	Call recording to monitor quality of service	
	Voucher acquisition	Contract performance
	Subscription and management of the accommodation assistance insurance	Contract performance
	Satisfaction questionnaire	Legitimate interest
Commercial and Marketing Activity	Profile Analysis	Legitimate interest
	App Download	Consent based on unambiguous actions
	Delivery of commercial communications	Consent
		Legitimate interest
	Social Media marketing Campaigns and contests	Consent
Compliance with legal obligations	Invoicing	Legal obligation
	Communications	Legal obligation
Loyalty programme management	Loyalty programme membership and management	Contract performance
	Sending programme communications	Contract performance
Analysis of profile and site navigation	User profile analysis	Consent
	Analysis of user conversions	Consent
	Implementation of improvements and development on the Site	Legitimate interest

5. TECHNICAL, ORGANIZATIONAL AND SECURITY MEASURES IMPLEMENTED.

In order to guarantee the security of the User Data and maximum confidentiality, AlgarveHome treats the information you provided to us in an absolutely confidential manner, in accordance with its internal security, and confidentiality policies and procedures, which are updated periodically as required, as well as the terms and conditions legally set out.

As a function of the nature, scope, context and purpose of data processing, as well as the risks arising from the treatment of the rights and freedoms of the User, AlgarveHome undertakes to apply, both when defining the method and timing of handling the data, the technical and organizational measures necessary and appropriate for the protection of User Data and compliance with legal requirements.

It also undertakes to ensure that, by default, only data that are necessary for each specific handling purpose are processed and that such data are not made available without human intervention to an indeterminate number of people.

Communication between the user's device and the AlgarveHome Site is done through secure channels and communications using the HTTPS protocol and the SSL security standard. Nevertheless, in terms of general measures, AlgarveHome adopts the following:

- Regular audits to identify the effectiveness of the technical and organizational measures implemented;
- Sensitization and training of personnel involved in data processing operations;
- Pseudonymization and coding of personal data;
- Mechanisms capable of ensuring the permanent confidentiality, availability and resilience of information systems;
- Mechanisms to ensure the restoration of information systems and access to personal data in a timely manner in the event of a physical or technical incident.

6. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

AlgarveHome may transfer your personal data to recipients in countries outside the European Union, which may have different levels of personal data protection.

Consequently, AlgarveHome is concerned to adopt appropriate measures to ensure the secure transfer of your personal data, whenever there is a transfer to a third country, whose level of protection of your personal data is different from that of the country where the personal data are collected.

This transfer of data results, inter alia, from the need to send your data as part of reservation processes in AlgarveHome's accommodation facilities, located in different geographical locations.

AlgarveHome undertakes to ensure that transfers of personal data to countries outside the European Union comply with the applicable legal provisions, in particular with regard to determining the suitability of such country with regard to data protection and the requirements applicable to such transfers.

7. USE OF COOKIES

When you visit the Site, a small text file (Cookie) is created and recorded on your computer disc. These text files will allow a more personalized and efficient navigation experience. Each time you visit the Site, your internet browser sends these cookies back to the Site, allowing the recognition and the identification of the Users, as well as their usage preferences. These Cookies will only be installed with your express consent, except in cases where they are necessary for the operation of the Site.

To find out all the information about the cookies we use on the Site, including their purposes, categories, duration, and to whom they belong, you can consult our Cookies Policy available here.

In addition, you have the possibility at any time to manage your preferences regarding the collection of cookies in the preference manager available here.

8. THIRD PARTY TOOLS USED IN THIS SITE

Facebook and Instagram

In the Site there is an interactivity with Facebook and Instagram through a connection with these social networks' servers is established. This allows the social networks to identify the Site that the User is visiting, and potentially store other data such as the IP address.

If the user is also connected in these social networks, may also be associated the data with the User's account. If the user wants to prevent this, should done log out from Facebook and/ or Instagram before visiting the webpage.

You can find more information about how Facebook and Instagram process data on their Sites:

<https://www.facebook.com/about/privacy/>

<https://help.instagram.com/519522125107875>.

Twitter

The Site has an interactivity with Twitter Inc. (hereinafter “Twitter”). When you access a webpage using such buttons, a connection with Twitter’s servers is established. This allows Twitter to identify the Site that the User is visiting, and potentially store other data such as the IP address.

You can find more information about how Twitter processes data on Twitter Site:

<https://twitter.com/privacy>.

YouTube

The Site has an interactivity with YouTube through a connection with this website servers is established. This allows YouTube to identify the Site that the User is visiting, and potentially store other data such as the IP address.

If the user is also connected in YouTube, may also be associated the data with the user’s account. If the user wants to prevent this, should done log out from your YouTube account before visiting the webpage.

You can find more information about how YouTube processes in the following link:

<https://www.youtube.com/intl/en-GB/yt/about/policies/#community-guidelines>.

B. USER RIGHTS (DATA OWNERS)

9. THE RIGHT OF INFORMATION

9.1. Information provided to the User by AlgarveHome (when data are collected directly from the User):

- The identity and contacts, of the personal data controller and, if applicable, of its representative;
- The contacts of the Data Protection Supervisor;
- The purposes of the processing to which the personal data are intended, as well as, if applicable, the legal reasons for the processing;
- If the processing of the data is based on the legitimate interests of AlgarveHome or a third party, an indication of such interests;
- If applicable, recipients or categories of recipients of personal data;
- If applicable, an indication that personal data will be transferred to a third country or an international organization, and whether a decision on appropriateness has been adopted by the Commission or a reference to suitable or appropriate transfer guarantees;
- Term for the retention of personal data;
- The right to request AlgarveHome’s permission for personal data, as well as its correction, elimination or limitation, the right to oppose its processing and the right to access the data;
- If the processing of the data is based on the User’s consent, the right to withdraw it at any time, without compromising the legality of the processing carried out based on the consent previously given;
- The right to file a complaint with the CNPD (Comissão Nacional de Protecção de Dados [Portuguese Data Protection Authority]) or other supervisory authority;
- Indication of whether the communication of personal data constitutes a legal or contractual requirement to enter into an agreement and whether the holder is required to provide the personal data and the possible consequences of not providing such data;
- If applicable, the existence of automated decisions, including the definition of profiles, and information regarding the basic concept, as well as the importance and expected consequences of such processing for the data subject.
- If the User Data is not collected directly by AlgarveHome from the User, in addition to the aforementioned information, the User is also informed about the categories of personal data being processed, as well as the origin of the data and, whether they are from sources accessible to the public.
- In the event of AlgarveHome intending to proceed with the further processing of the User Data for a purpose other than that for which the data was collected, before this processing,

AlgarveHome shall provide the User with information about that purpose and any other information of interest, under the terms referred to above.

9.2. Procedures and measures implemented to fulfil the right to information.

The information referred to in paragraph 8.1. is provided in writing (including by electronic means) by AlgarveHome to the User prior to the processing of the personal data in question. In accordance with applicable law, AlgarveHome is under no obligation to provide the User with the information mentioned in paragraph 8.1 when and to the extent that the User already has knowledge of them.

This information is provided by AlgarveHome at no cost.

10. THE RIGHT OF ACCESS

AlgarveHome guarantees the means that allow the user to consult his or her Personal Data.

The User has the right to obtain confirmation from AlgarveHome that personal data concerning him or her are processed and, if applicable, the right to access his/her personal data and the following information:

- The purposes of data processing;
- The categories of personal data in question;
- The addressees or categories of recipients to whom the personal data have been or will be disclosed, in particular to recipients based in other countries or belonging to international organizations;
- The term for the retention of personal data;
- The right to ask AlgarveHome to correct, eliminate or limit the processing of personal data, or the right to prevent such processing;
- The right to file a complaint with the CNPD or other supervisory authority;
- If the data has not been collected from the User, the available information on the origin of such data;
- The existence of automated decisions, including the definition of profiles, and information on the underlying reasoning, as well as the importance and expected consequences of such processing for the data subject;
- The right to be informed about the appropriate safeguards associated with the transfer of data to third countries or international organizations.

Upon request, AlgarveHome will provide the User, free of charge, with a copy of the User Data that is being processed. The providing of other copies requested by the User may entail administrative costs.

11. THE RIGHT TO RECTIFICATION

The User has the right to request, at any time, correction of his or her Personal Data, as well as the right to have incomplete personal data completed, including by means of an additional declaration.

In the event of limitation of processing of data, AlgarveHome shall inform each recipient/entity to whom the data has been transmitted of the limitation, unless such communication proves impossible or involves a disproportionate effort on behalf of AlgarveHome.

12. THE RIGHT TO ERASURE (“RIGHT TO BE FORGOTTEN”)

The User has the right to obtain, on the part of AlgarveHome, deletion of his/her data when one of the following reasons apply:

- The User Data is no longer required for the purpose for which it was collected or processed;

- The User withdraws the consent on which the data processing is based and there is no other legal basis for such processing;
- The User opposes the treatment under the right of opposition and there are no prevailing legitimate interests justifying the processing;
- If User Data is processed illegally;
- If User Data must be deleted in order to comply with a legal obligation to which AlgarveHome is subject;
- Under the applicable legal terms, AlgarveHome is under no obligation to delete User Data to the extent that the processing proves necessary to fulfil a legal obligation to which AlgarveHome is subject or for the purposes of declaring, exercising or defending AlgarveHome's rights in judicial proceedings.

In the event of the data being deleted, AlgarveHome shall inform each recipient/entity to whom the data has been transmitted of the deletion, unless such communication proves impossible or involves a disproportionate effort on behalf of AlgarveHome.

When AlgarveHome has made the User Data public and is obliged to delete it under the right of such deletion, AlgarveHome undertakes to ensure reasonable measures, including of a technical nature, taking into account available technology and costs of its application to inform those responsible for the effective processing of personal data for which the User has requested deletion of the links to such personal data, as well as copies or reproductions thereof.

13. RIGHT TO RESTRICTION OF PROCESSING

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- If the accuracy of personal data is challenged, for a period that allows AlgarveHome to verify its accuracy;
- If the processing is unlawful and the User opposes the deletion of the data, requesting, instead, a limitation on its use;
- If AlgarveHome no longer requires the User Data for processing purposes, but such data is required by the User for the purposes of declaring, exercising or defending their rights in judicial proceedings;
- In the event of the User objecting to the processing, until it is verified that AlgarveHome's legitimate reasons prevail over those of the User.

When User Data is subject to limitations, they may only, with the exception of storage, be processed with the consent of the User or for the purpose of declaring, exercising or defending a right in judicial proceedings, defending the rights of another natural or legal person, or for public interest reasons provided by law.

The User who has obtained the limitation of the processing of their data in the above cases shall be informed by AlgarveHome before the limitation on processing is annulled.

In the event of limitation of processing of data, AlgarveHome shall inform each recipient/entity to whom the data has been transmitted of the limitation, unless such communication proves impossible or involves a disproportionate effort on behalf of AlgarveHome.

14. THE RIGHT OF PORTABILITY OF PERSONAL DATA

The User has the right to receive personal data concerning him/her and which he/she has provided to AlgarveHome, in a structured, current and automated reading format, and the right to transmit such data to another person responsible for its processing, if:

- The processing is based on consent or a contract to which the User is a party; and
- The processing is performed by automated means.

The right of portability does not include inferred or derived data, i.e. personal data that are generated by AlgarveHome because of, or resulting from, analysis of the data being processed.

Users are entitled to have their personal data transmitted directly between those responsible for the processing, whenever this is technically possible.

15. RIGHT TO OBJECT

Users have the right to object at any time to the processing of personal data based on the legitimate interests pursued by AlgarveHome or when the processing is carried out for purposes other than those for which personal data were collected, including the definition of profiles, or when personal data are processed for statistical purposes.

AlgarveHome shall terminate the processing of User Data unless it can demonstrate urgent and legitimate reasons for such processing that prevail over the User's interests, rights and freedoms, or for the purposes of declaring, exercising or defending AlgarveHome's rights in legal proceedings.

When User Data is processed for the purpose of direct sales (marketing), Users have the right to oppose at any time the processing of the data that concern them for the purposes of said marketing, which includes the definition of profiles insofar as it relates to direct marketing. If Users object to the processing of their data for the purposes of direct marketing, AlgarveHome must cease the processing of the data for this purpose.

Users also have the right not to be subject to any decision made solely on the basis of automated processing, including the definition of profiles, that has an effect in the legal sphere or has a significant similar effect, unless the decision:

- Is necessary for the signing or implementation of a contract between the User and AlgarveHome;
- Is authorized by legislation to which AlgarveHome is subject; or
- Is based on the explicit consent of the User.

16. PROCEDURES FOR THE EXERCISING OF RIGHTS BY THE USER

The right of access, right to rectification, right of elimination, right to restriction, right to data portability and right to object may be all exercised by the User through the platform available at: <https://www.algarvehome.pt/contacts>.

For further information, please contact the AlgarveHome Data Protection Officer through the following e-mail info@algarvehome.pt or by letter to the Data Protection Officer, Urb. Monte Canelas, 83, Mexilhoeira Grande, Portimão, Portugal, 8500-157.

AlgarveHome will respond in writing (including by electronic means) to the User's request within a maximum period of one month from the receipt of the request, except in particularly complex cases, for which this period may be extended up to two months.

If the requests submitted by the User are manifestly unjustified or excessive, especially due to their repetitive nature, AlgarveHome reserves the right to charge administrative costs or refuse to comply with the request.

17. PERSONAL DATA BREACH

In the event of a personal data breach and insofar as such a breach is likely to entail a high risk to the User's rights and freedoms, AlgarveHome undertakes to inform the User in question of the personal data violation within 72 hours of learning of the incident.

Under the legislation, communication to the User is not required in the following cases:

- When the personal data breach is not likely to result in a high risk to the rights and freedoms of natural persons;

- If communication to the User implies a disproportionate effort on behalf of AlgarveHome. In this case, AlgarveHome will release a public communication or take a similar action by which the User will be informed.

C. FINAL PART

18. AMENDMENTS TO THE PRIVACY POLICY

AlgarveHome reserves the right to make changes to this Privacy Policy at any time. We advise you to read this document regularly.

19. RIGHT TO COMPLAIN BEFORE THE SUPERVISORY AUTHORITY

Please note that you have also the right to lodge a complaint before the competent supervisory authority for the protection of personal data. In Portugal, the supervisory authority is the National Data Protection Committee, with its head office at Av. D. Carlos I, 134 - 1.º 1200-651 Lisbon, with the following phone number (+351) 213928400 and the following e-mail: geral@cnpd.pt