

# CUSTOMER PERSONAL DATA PROTECTION CHARTER

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## 1. Our commitment to protecting privacy

We consider you an important customer. Our first priority is to offer you exceptional stays and experiences. That's why, as part of our commitment to meeting your expectations, we have set up a customer personal data protection charter. This charter formalizes our commitments to you and describes how we use your personal data.

## 2. Scope of application

In this charter, “we”, “our”, “us”, etc. refer to **Agroturismo Monte da Serraheira**.

## 3. Our principles for protecting your personal data

In accordance with applicable regulations, in particular the European General Data Protection Regulation, we have instituted the following principles:

- i. **Lawfulness:** We use personal data only if:
  - we obtain the consent of the person, OR
  - it is necessary to do so for the performance of a contract to which the person is a party, OR
  - it is necessary for compliance with a legal obligation, OR
  - it is necessary in order to protect the vital interests of the person, OR
  - we have a legitimate interest in using personal data and our usage does not adversely affect the persons' rights
- ii. **Fairness:** We can explain why we need the personal data we collect.
- iii. **Purpose limitation and data minimisation:** We only use personal data that we really need. If the result can be achieved with less personal data, then we make sure we use the minimum data required.
- iv. **Transparency:** We inform people about the way we use their personal data
- v. We facilitate the exercise of the people's **rights**: access to their personal data, rectification and erasure of their personal data and the right to object to the use of their personal data
- vi. **Storage limitation:** We retain personal data for a limited period
- vii. We ensure the security of personal data, i.e. **its integrity and confidentiality**.
- viii. If a **third party** uses personal data, we make sure it has the capacity to protect that personal data.
- ix. If personal data is transferred outside Europe, we ensure this **transfer** is covered by specific legal tools.
- x. If personal data is compromised (lost, stolen, damaged, unavailable...), we notify such breaches to the respective country's responsible authority and to the person concerned, if the **breach** is likely to cause a high-risk in respect of the rights and freedoms of this person.

For any questions concerning the principles of protection policies, please contact us, details appear in the clause "Your rights".

## **4. What personal data is collected?**

At various times, we may collect information about you and/or the persons accompanying you, including the following:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example, date of birth, nationality)
- Information relating to your children (for example, first name, date of birth, age)
- Your credit card number (for transaction and reservation purposes)
- Information contained on a form of identification (such as ID card, passport or driver licence)
- Your arrival and departure dates
- Your preferences and interests (for example, type of bedding, sports, cultural interests, food and beverages preferences, etc.)
- Your questions/comments, during or following a stay
- Technical and location data you generate as a result of using our websites and applications.

The information collected in relation to persons under 16 years of age is limited to their name, nationality and date of birth, which can only be supplied to us by an adult. We would be grateful if you could ensure that your children do not send us any personal data without your consent (particularly via the Internet). If such data is sent, you can contact us (see clause "Your rights" below) to arrange for this information to be deleted.

In order to meet your requirements or provide you with a specific service (such as dietary requirements), we may have to collect sensitive information, such as information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of health or sexual orientation. In this case, we will only process this data if you provide your express prior consent.

## **5. When is your personal data collected?**

Personal data may be collected on a variety of occasions, including:

1. Hotel activities:
  - Booking a room or apartment
  - Checking-in and paying
  - Your stay at Monte da Serralheira and services provided during a stay
  - Requests, complaints and/or disputes.
2. Transmission of information from third parties:
  - Tour operators, travel agencies (online or not) and others
  - State bodies

## 6. What purposes is your data collected for and how long do we retain it?

The table below sets out why we process your data, the lawful basis for the processing and the associated retention period:

| Purpose/Activity                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Lawful basis for processing including basis of legitimate interest                                                                                                               | Retention period                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Meeting our obligations to our customers.                                                                                                                                                                                                                                                                                                                                                                                                                                             | Performance of a contract with you.                                                                                                                                              | 10 years from the booking in accordance with legal obligations.             |
| Managing the reservation of rooms and accommodation requests, in particular the creation and storage of legal documents in compliance with accounting standards.                                                                                                                                                                                                                                                                                                                      | <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interest in running our business and providing you with requested products and services.</p> |                                                                             |
| <p>Managing our relationship with customers before, during and after your stay:</p> <ul style="list-style-type: none"> <li>• Inputting details into the customer database</li> <li>• Developing statistics and reporting</li> <li>• Understanding and managing the preferences of new or repeat customers</li> <li>• Sending customers newsletters or contacting you by telephone subject to the requirements of the EU ePrivacy directive (2002/58/EG as amended in 2009)</li> </ul> | <p>Performance of our contract with you.</p> <p>Necessary for our legitimate interests in promoting our services and improving our services.</p>                                 | 3 years from the last date on which you have interacted with us in any way. |
| Internal management of lists of customers having behaved inappropriately during their stay at Monte da Serralheira (aggressive and anti-social behaviour, non-compliance with safety regulations, theft, damage and vandalism or payment incidents).                                                                                                                                                                                                                                  | Necessary for our legitimate interests in running our business and to prevent fraud and the abuse of our property and staff.                                                     | Up to 4 months from the recording of an event.                              |
| Using services to search for persons staying here in the event of serious events affecting our premisses (natural disasters, terrorist attacks, etc.).                                                                                                                                                                                                                                                                                                                                | Protection of the vital interests of the guests.                                                                                                                                 | For the duration of the event.                                              |
| <p>Conforming to any applicable legislation (for example, storing of accounting documents), including:</p> <ul style="list-style-type: none"> <li>• Managing requests to unsubscribe from newsletters, promotions, tourist offers and satisfaction surveys</li> <li>• Managing data subject's requests regarding their personal data.</li> </ul>                                                                                                                                      | Necessary to comply with a legal obligation.                                                                                                                                     | As stipulated in the respective country's legislation.                      |

## 7. Conditions of third-party access to your personal data

- With service providers and partners: your personal data may be sent to a third party for the purposes of supplying you with services and improving your stay, for example external service providers: IT sub-contractors, banks, credit card issuers, external lawyers and dispatchers.
- With local authorities: We may be obliged to send your information to local authorities if this is required by law or as part of an inquiry. We will ensure that any such transfer is carried out in accordance with local regulations.

## 8. Data security

We take appropriate technical and organizational measures, in accordance with applicable legal provisions (in particular: Art. 32 GDPR), to protect your personal data against illicit or accidental destruction, alteration or loss misuse and unauthorized access, modification or disclosure.

## 9. Your rights

You have the right to obtain information about and access your personal data, subject to applicable legal provisions.

Also you have the right to have your personal data rectified, erased or have the processing of it restricted. Furthermore you have the right to data portability and to issue instructions on how your data is to be treated after your death (hopefully as late as possible!).

In the event that you wish to exercise any of your above rights, please contact us sending an email to [info@monteserralhaireira.com](mailto:info@monteserralhaireira.com) or by writing to the address below:

***Agroturismo Monte da Serralheira***  
*Rotunda de Serralheira*  
*7005 – 797 Évora*  
*PORTUGAL*

For the purposes of confidentiality and personal data protection, we will need to check your identity in order to respond to your request. In case of reasonable doubts concerning your identity you may be asked to include a copy of an official piece of identification, such as an ID card or passport, along with your request. A black and white copy of the relevant page of your identity document is sufficient.

All requests will receive a response as swiftly as possible.

You also have the right to lodge a complaint with a data protection authority.

## 10. Updates

We may modify this charter from time to time. Consequently, we recommend that you consult it regularly, particularly when making a reservation.