

## PRIVACY POLICY

### ***A Esplanada-Alojamento Local***

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*6000-346 Castelo Branco*

As a guest of ***Esplanada*** you are in complete control of your travel-planning needs. This includes controlling the use of the personal data information you provide to us.

The bottom line is that we respect and will continue to respect the privacy of our guests and any third party reservations companies and systems that works with us. We takes guests privacy seriously, this Privacy Policy governs the manner in which we, uses, maintains and discloses information collected from our guests, to provide any accommodations ,products ,services, features, contents offered by us. We encourage guests to read this Policy carefully. By using our services, you are agreeing and consenting to the practices described in this Policy.

For the proposal of this Policy:

**“Personal Data”** means information about an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity; and

**“Processing”** means the collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction, or any other use, of Personal Data.

#### **Collection of Personal Data**

We may collect Personal Data from guests or their devices when they: visit any Services, register to use any Services, use any Services, download any Services, contact us by mail, phone, email or any other means; or otherwise interact with us.

We may collect guests ' Personal Data, and further Process those Personal Data, as set out below. Third parties may also provide us Data about guests Such Personal Data will be Processed in accordance with this Policy.

We may also collect any of the following types of Personal Data from guests , in the course of using the Sites ,the Apps and other means : contact information (e.g., name, address, email address, phone number, or social media details). We may use your contact information to send you information about our Services, when we feel such information is important. You may unsubscribe from these messages, although we

reserve the right to contact you even if you unsubscribe if we believe it is necessary in connection with the Services, such as for account recovery purposes.

### **Disclosure of Personal Data**

We may disclose guest ' Personal Data: (i) in connection with any legal proceedings, or otherwise for the purposes of establishing, exercising or defending any legal rights; (ii) if required by applicable law, regulation or legal process; (iii) in response to requests by government agencies and law enforcement authorities; (iv) when we believe disclosure is necessary or appropriate to prevent physical harm or material financial loss; or (v) for the purposes of investigating actual or alleged unlawful activity.

**Because protecting your privacy is important to us, you can be assured that we discloses the following:**

What personal information is being gathered by us and how is this information being used?

#### Contact Submission

When you submit a reservation request or a contact form to us you provide your name, address, telephone number, e-mail address and other personal data information including in certain cases your credit card information. This information is collected on the registration form for several reasons including: (i) personal identification; (ii) to complete the reservations; (iii) to allow us to contact you for customer service, if necessary; (iv) to meet your specific needs; and (v) to make product improvements. In addition, your e-mail address is collected to send you an e-mail message confirming each reservation you transaction. As a guest you will occasionally receive, and other noteworthy news items. However, you may always decline to receive these e-mail messages.

It is the responsibility of each guest to ensure that their Personal Data held by us is complete, accurate and up-to-date. Subject to applicable law, the guest may have the right to access their Personal Data, held by us correct any errors in those Personal Data, and or request to deletion of those Personal Data . These rights may be exercised by sending a request to our email [geral@Esplanada.com](mailto:geral@Esplanada.com) .

#### Guests information /data retention

Guests can choose to provide us with travel credit-card billing information, invoice - delivery address, and other personal data. This information is primarily used to assist you in making reservations expediently and to meet your needs. In addition this information may be required or supplied by our third party services such as providers, networks reservations companies or others systems. We will only retain guests Personal Data for as long as we require those Personal Data in connection with the purposes set out in this Privacy policy .We may also be required to retain Personal Data for additional periods of time for example, where required by applicable laws or regulations

#### Collected information Surveys

We values opinions and comments from guests, so we frequently conduct surveys (direct or online). These surveys are entirely optional for all guests. Typically, the information is aggregated and used to make improvements, and to develop appealing

content, features and promotions for guests. Survey participants are anonymous unless otherwise stated in the survey.

We also may collect statistical information about the use of the services by registered guests some of this information is derived from Personal Data. This Privacy Statement does not cover the information practices or policies from other third parties.

Who will the information be shared with, if anyone?

When you reserve or purchase our services we provide or demand information about you from travel agency or other involved third party to ensure the successful fulfillment of your stay arrangements.

We do not use individual customer names or other private profile information to third parties now or in the future. Occasionally, will hire a third party to act on our behalf for projects such as market-research surveys and contest-entry processing and will provide information to these third parties specifically for use in connection with these projects. The information we provide to such third parties is protected by a confidentiality agreement and is to be used solely for completing the specific project.

What other information should I know about my privacy?

**Esplanada** contains links to other Web sites. Please note that when you click on one of these links, you are entering another Web site for which we have no responsibility. We encourage you to read the privacy statements of all such sites as their policies may be materially different from Privacy Statement. Of course, you are solely responsible for maintaining the secrecy of your passwords and any account information. Please be very careful, responsible, and alert with this information, especially whenever you're online.

In addition to the circumstances described above, we may disclose your information if required to do so by law, court order, as requested by other government or law enforcement authority, or in the good faith belief that disclosure is otherwise necessary or advisable including, without limitation, to protect the rights or when we have reason to believe that disclosing the information is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

Any material changes in the way we uses personal information will be described in future versions of this Privacy Statement. Of course, you may always submit concerns regarding our Privacy Statement or our privacy practices by contacting us to email [geral@Esplanada.com](mailto:geral@Esplanada.com).

The Right of Portability of Personal Data

Guest has the right to receive personal data concerning him/her and which he/she has provided to us 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 guest 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 as a consequence of, or resulting from, analysis of the data being processed. Guest are entitled to have their personal data transmitted directly between those responsible for the processing, whenever this is technically possible.

#### Right to Oppose Processing

You have the right at any time, for reasons relating to particular situation, to object to the processing of personal data concerning the exercising of legitimate interests pursued by us 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.

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

When the personal Data is processed for the purpose of direct sales (marketing), you have the right to oppose at any time the processing of the data . If you object to the processing of your data for the purposes of direct marketing, we must cease the processing of the data for this purpose.

You 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 you and us;
- Is authorized by legislation to which is subject; or
- Is based on your the explicit consent .

#### **Procedures for the exercising your rights**

The right of access, right to make corrections, right of elimination, right of limitation, right of portability and right to opposition may be all exercised by the guests by contacting the us.

We will respond in writing (including by electronic means) to your 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 you are manifestly unjustified or excessive, especially due to their repetitive nature, we reserves the right to charge administrative costs or refuse to comply with the request.

#### **Personal data Violations**

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

Under the legislation, communication to you is not required in the following cases: has applied satisfactory protection measures, both technical and organizational, and these measures have been applied to personal data affected by the personal data violation, especially measures that make the personal data incomprehensible to anyone unauthorized to access such data, such as encryption; If we has taken subsequent action to ensure that the high risk to your rights and freedoms is no

longer likely to materialize; or If communication to the you implies a disproportionate effort from us . In this case, we will release a public communication or take a similar action by which you will be informed.

**The Privacy Policy as well as the collection, processing or transmission of guest Data are all governed by the provisions of EU Regulation 2016/679 passed by the European Parliament and Council on 27 April 2016, and by the laws and regulations applicable in Portugal.**

**How to contact us:**

For any questions about Privacy Policy, our Processing practices, or your dealings, please contact us at:

***Esplanada***– [geral@Esplanada.com](mailto:geral@Esplanada.com)