

## INTRODUCTION

The privacy policy described below provides you with an overview of how Unlock Thoughts, SA. processes your personal data and your rights in this regard, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council - General Data Protection Regulation ("GDPR") and other applicable privacy and data protection legislation as the managing body of Hotel da Estrela. The specific personal data that will be processed and the way in which it will be used depends to a large extent on the services requested by you and agreed with you.

This privacy policy applies to the personal data of our Website Users, Clients, Suppliers and Applicants, whenever they are natural persons.

Each time you use the Site you are subject to the application of the Privacy and Cookies Policy in force at any given time, so we suggest that you read these Policies carefully to check that you agree with their terms.

We may change this Privacy Policy from time to time. If you wish to keep up to date, please visit this page, as all changes will be published here.

For the purposes of applicable data protection legislation, the company responsible for processing your personal data is Unlock Thoughts, SA. hereinafter referred to as "UBH".

UBH websites may occasionally contain links, banners or other hypertext links to websites and services of other companies, which have their own privacy policies, and/or services provided by third parties installed on your device may allow access to information contained therein. We recommend that our Site Users carefully read the privacy policies of such third parties before submitting any personal data to such websites. UBH has no control over the content of these websites and is therefore not responsible for the content of the privacy policies of these third parties or the processing of your personal data by them.

## GLOSSARY

**Deletion** - we will permanently delete your personal data as soon as the retention period ends or when we receive a valid request from you to do so and provided that there are no legitimate interests justifying the retention of your personal data.

**Applicants** - includes applicants for all roles advertised or promoted by UBH, including permanent, part-time and temporary roles and roles in self-employment with UBH; as well as persons who have submitted a spontaneous CV to UBH unrelated to a specific job offer. Individual contractors, self-employed persons and employees of suppliers or other third parties who apply for positions at UBH will be treated as applicants for the purposes of this Privacy Policy.

**Personal data** - any information relating to a natural person which can be directly identified or which makes that person identifiable, directly or indirectly, in particular by reference to an identifier.

**Customers** - customers and others to whom UBH provides services or supplies goods in the course of its business.

Suppliers - refers to partners, consultants, traders (including sole traders) and self-employed persons or any other entity that supplies goods or provides services to UBH. In some circumstances, UBH will subcontract the services it provides to Customers to third party suppliers who perform the services on behalf of UBH, who are also covered by this definition and this Privacy Policy.

Staff - includes dependent workers as well as trainees directly involved in UBH's activity.

General Data Protection Regulation (GDPR) - a European Union legal instrument aimed at harmonising European data protection legislation. It comes into force on 25 May 2018 and any references to it should be interpreted accordingly to include any legislation that amends, concretises or aims to implement it.

UBH - whenever we talk about UBH, we mean the entity responsible for processing the personal data of "Website Users", responsible for processing the personal data of Customers, Suppliers, Applicants and emergency contacts of Staff. In this case, the counterparty associated with the relevant agreement will be:

Unlock Thoughts, SA. – NIPC 513 923 195. Sede: Rua do Bom Sucesso, 372 – 5 andar. 4150-148 Porto

Website Users - any person who accesses the UBH website or the brands commercialised and managed by it:

[www.unlockhotels.com](http://www.unlockhotels.com)

<https://hotelmeloalvim.com>

<https://www.monverde.pt/>

<https://lavandeiradouro.com/>

<https://quintadecabanas.pt/>

<https://jardinsdoporto.pt/>

<https://senhorasrainhasobidos.com/>

<https://rosegarden.house/>

<https://hoteldaestrela.com/>

<https://chafarizdelrei.com/>

<https://thenoblehouse.pt/>

<https://adcevora.com/>

<https://sobreiras.pt/>

<https://puremonchiquehotel.com/>

<https://monchiquetermalresort.com/>

<https://hotelcentral.monchiquetermalresort.com/>

<https://suitesapartments.unlockhotels.pt/>

<https://shop.unlockhotels.com/>

## **IDENTIFICATION OF THE DATA PROTECTION OFFICER**

Considering the nature of the personal data processing activities conducted by UBH, it has appointed a Data Protection Officer (DPO).

The DPO is responsible for informing and advising UBH on regulatory matters, monitoring UBH's compliance with applicable regulatory requirements in the context of data protection, cooperating and communicating with the supervisory authority, providing

advising on the data privacy impact assessment and monitoring its completion.

The DPO is at the disposal of data subjects, who can contact him or her to ask questions relating to the processing of their personal data or privacy matters at UBH, as well as to request further information or submit complaints.

Below is the identification and contact details of the UBH DPO:

Name: Augusta Cristina Araújo Silva Teixeira

E-mail: [dpo@unlockhotels.com](mailto:dpo@unlockhotels.com)

## **WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?**

UBH collects different types of personal data for different purposes, as explained below. In any case, we emphasise that we do not intentionally collect personal information from children under 18. If we detect that we have unintentionally collected personal information from minors under the age of 18, we will take the necessary steps to delete the information as soon as possible, unless we are obliged by applicable law to retain it.

**CUSTOMER DATA** - We only collect the data necessary for the preparation, fulfilment and performance of any contract entered into between the Customer and UBH, as well as to respond to any subsequent claims relating to the same. Normally, we only need to have your contact details (such as name, telephone number, email address, address and postcode) to enable us to ensure that our relationship runs smoothly. We also hold information relating to your online engagement, which we use to ensure that the marketing communications we send you are relevant and timely, in accordance with the consent you have given us. We may also hold images from CCTV systems if you visit our premises and information that you have chosen to share with us, either directly or through someone in your company (evaluation of our services and products, allergies, physical and health conditions and dietary restrictions). If, for any reason, we need any additional personal data, you will be informed.

**SUPPLIER DATA** - We only collect the data necessary for the preparation, fulfilment and execution of any contract entered into between the Supplier and UBH, as well as to respond to and manage any claims related thereto. We will collect the data of contact persons, including those of your company, such as names, telephone numbers and e-mail addresses. We will also collect bank details so that we can pay you. We may also

information that you or someone in your company has chosen to share with us, and images from CCTV systems if you visit our premises.

**WEBSITE USERS** - We only collect the data necessary to guarantee a good experience when using the Website and to allow you to take advantage of all the potential and features it offers, as well as to help us manage the services we provide. This includes information such as how you use our site, how often you access it, your browser type, your IP address, the location from which you visit our site, the language you choose to view it and the times when our site is most popular, as well as other information further described in our cookie policy below. If you contact us via the site, or subscribe to our newsletter, we will collect any information you provide, such as your name and contact details.

**APPLICANT DATA** - Depending on the relevant circumstances and applicable local laws and requirements, we may collect all or part of the information listed below:

- Identifying data: such as name and contact details (telephone and e-mail), immigration status (in case you need a work permit), a photograph of yourself.
- Professional status and activity, such as education data; employment history; current remuneration, pensions and benefits-related provisions, if this is required for the vacancy for which you wish to apply.
- Additional information that you choose to share with us, such as in your cover letter, CV or interviews;
- Additional information that our Clients may share about you or that we discover from other third-party sources (i.e. references);
- IP address; the dates, times and frequency with which you access our services and/or website; and
- CCTV images if you visit our premises. Please note that the above list of categories of personal data we may collect is not exhaustive.

In addition to the above, registration via social media (which involves using your social media credentials such as your login information as a Facebook, Instagram and Google+ user to create your UBH account and log in with it) also allows us to collect personal data: when you use the option to log in via social media, UBH will only use the public profile information that is necessary to create your UBH account.

UBH will not process any irrelevant information for this purpose that it receives from social networks. Once you have created an account, you will have the opportunity to complete it with any information you wish to share with us that will improve the experience when you interact with us. Any additional information you provide will only be used for the purposes set out in this privacy policy.

## **DO I HAVE AN OBLIGATION TO PROVIDE MY DATA?**

Within the scope of our commercial or labour relationship, you will have to provide the personal data necessary to establish and create that relationship and to fulfil the obligations and pre-contractual and contractual steps derived from it, as well as those that we are legally

obliged to collect. Without this data, we will generally have to refuse to enter into or perform the contract, or we will not be able to maintain the contract and will have to terminate it.

If you do not provide us with the necessary information and documentation, we will not be able to establish or continue the commercial or labour relationship you are seeking, or follow up on your requests.

## **HOW DO WE COLLECT YOUR PERSONAL DATA?**

We may collect personal data in several ways:

Personal data that we receive directly from you if you contact us proactively, usually by telephone or e-mail; and/or if we contact you by telephone or e-mail or through business development activities more generally.

There are different ways of sharing your information with us. It all depends on what suits you. These may include:

- Entering your details on the UBH Website or that of the brands marketed and managed by UBH via the form as part of the registration process; or
- Sending your CV by email or leaving a paper copy of your CV;
- Participating in a competition via a social media channel, such as Facebook or Twitter, Instagram, Pinterest or another;
- Signing up to our newsletter or one of our events;
- Purchasing vouchers in the online shop or direct bookings at hotels managed by UBH.

Personal data we receive from other sources, usually through commercial due diligence or other market information, including lists of attendees at relevant events. We also receive personal data from other sources, for example if you "like" our Facebook page or "follow" us on Twitter or Instagram, we will receive personal information from those sites.

To the extent that you access our Site or read or click on an e-mail from us, where appropriate and in compliance with local laws and requirements, we may also collect data from you or automatically. When you visit our Site there is certain information that we may collect automatically, whether or not you decide to use our services. This includes your IP address, the date, times and frequency with which you access our site and how you browse its content, all as set out in the cookie policy below. We will also collect data from you when you contact us via the Site.

We collect your data automatically through cookies, in accordance with your browser's cookie settings. If you are also a UBH Candidate or Customer, we may use data from your use of our Sites to improve other aspects of our communications with you or the services we provide to you.

Why do we process your data (purpose of processing) and on what legal basis?

Provision of products and services:

UBH may use your personal data when this is necessary to perform the contract concluded between you and UBH or the brands marketed and managed by UBH, as well as to identify you. We may also use your Personal Data to prevent and investigate possible misuse.

Marketing activities

We may, from time to time, send you information that we consider to be of interest to you. In particular, we may use your data for the purposes listed below, where appropriate:

- to allow us to develop commercial or marketing actions, namely to promote actions to publicise new functionalities or new products and services;
- to send you data on reports, promotions, offers, events and the establishment of contacts;
- provide you with information on certain discounts and offers to which you are entitled due to your relationship with UBH;
- allow us to send you newsletters, which may contain information regarding promotional campaigns, information about events, discounts, promotions and offers, invitations, reminders regarding your bookings, actions to publicise new

new features, new products or services and to send you information about taking part in competitions and prize draws, in accordance with the thematic preferences you have indicated to us by email;

- to provide you with information on personalised and exclusive offers of products and services identified on the basis of your personal preferences and behaviour, as well as from the use of products, services and browsing on the websites.

When you have provided us with your electronic contact details in the context of the sale of a product or service, we may use them for the purposes of marketing our own products and services or similar products and services. However, if you do not agree with our marketing approach, you may, free of charge, refuse to be sent these communications either when they are collected or when each message opts out. When sending any other type of electronic communication, we will ask for your prior express consent. We need your consent for some aspects of these activities that are not covered by our legitimate interests (in particular, the collection of data through cookies and the provision of direct marketing to you through digital channels).

If you do not agree with our marketing approach, you have the right to withdraw your consent at any time. All our marketing is based on what we think will best serve our Clients and Candidates, but we are

aware that we won't always get it right. We may use your data to show you UBH adverts and other content on other sites such as Facebook. If you do not want us to use your data in this way,

deactivate the "Advertising Cookies" option (see our Cookie Policy).

#### Other purposes

- To store (and update when necessary) your information in our database, so that we can contact you in relation to the contracts you wish to enter into / have entered into with us;
- To offer you services or to obtain support and services from you;
- To fulfil certain legal obligations;
- To help us target appropriate marketing campaigns, whereby UBH may adopt automated decisions, including profiling;
- In rare circumstances, to assist us in asserting, exercising or defending a right; and
- To defend the vital interests of the data subject.

We may also use your personal data if we consider it necessary to do so for the defence of our legitimate interests.

#### Development of products and services

UBH may use your personal data for the development of its products and services. However, we will predominantly use aggregated data and statistical information for this purpose. UBH keeps track of the pages our

our customers visit within the website to determine which services/products are most requested. In this case, information is collected regarding the computer or device (including mobile devices) you use to access it, namely your IP address, the website through which you accessed ours, the type and language of your browser, operating system, cookies, the country from which you are accessing it, referring and exit pages, URL, type of platform, the number of clicks made, domain names, landing pages, pages visited and the order in which you visited them, the time spent on a particular page, the date and time you accessed our website, access errors and other similar information that your browser sends us.

#### Communication

UBH may use your personal data to communicate with you, namely to send you news related to our products or services, or to assist you in aspects related to customer support, namely to respond to and process user requests through customer service channels, as well as monitoring the quality of our service.

In this case, your full name, email address and telephone number are collected.

Subscribing to the UBH Newsletter may involve the use of personal data in order to carry out personalised advertising of our products and services available to the user via email, push notifications via

any other electronic means or third parties.

You can unsubscribe from the Newsletter at any time by following the information provided in each communication.

UBH may use data that has been identified on the basis of your personal and behavioural preferences, which we collect from your interactions with us, whether through the Website, app, helpline, as well as from the use of products, to send you personalised offers.

In this case, the following personal data will be collected: gender and preferences for services or products.

The processing of data for the purpose of profiling and market research is also based on UBH's legitimate interest. To this end, UBH has considered the interests and rights of the data subjects, and the measures taken by the controller to

fulfil its general obligations in terms of proportionality and transparency, and concluded that:

- a) the impact on the fundamental rights and freedoms and guarantees of individuals is low;
- b) such processing can be reasonably foreseen by the data subject;
- c) the processing of data for the above purposes does not give rise to exclusion, discrimination, defamation or situations that jeopardise the data subject's reputation and/or bargaining power.

If you consider that this processing could have any emotional repercussions, you can exercise your right of access and/or objection, as well as opt out voluntarily without the need for justification. We inform you that you can limit this purpose by exercising your right to object by writing an e-mail to any of the contacts indicated in "How to contact us".

#### Improving the service provided to the user

Your Personal Data relating to your purchases in physical or online shops, tastes and preferences may be used for the purposes of analysis, creating user profiles, market research, quality surveys and improving our interaction with the customer.

#### Recruitment activities

In order to fill vacancies, we may carry out recruitment activities internally. We have listed below various ways in which we may use and process your personal data for this purpose:

- Collecting your data from you or from other sources, such as LinkedIn;
- Storing your data (and updating it where necessary) in our database so that we can contact you in relation to recruitment;
- Evaluate data about you in relation to vacancies that we think may be suitable for you;



- To allow you to send your CV, apply online for jobs or subscribe to alerts about jobs that we think may be of interest to you;
- To fulfil our obligations arising from any contracts entered into between us;
- To fulfil our obligations arising from any contracts entered into between UBH and third parties relating to your recruitment;
- To streamline our payroll and invoicing processes;
- Verify the data you have provided, using third party resources (such as psychometric assessments or skills tests) or to request information (such as references, insofar as this is appropriate under applicable law and you have provided us with the details of the reference contacts and obtained their prior authorisation for the transmission of your personal data, as well as authorising us to contact them); and
- To fulfil our legal obligations, including in particular with regard to the detection of crime or the collection of taxes or duties.

We process the aforementioned personal data in accordance with the provisions of the GDPR and other applicable legislation in this area, with the processing essentially being based on pre-contractual steps and the performance of a contract, the fulfilment of a legal obligation or the satisfaction of legitimate interests pursued by UBH or the protection of the vital interests of the data subject.

In other words, we use and process your personal data for the management and performance of contracts or other steps requested by the data subject (Art. 6(1)(b) GDPR); within the framework of a legitimate interest (Art. 6(1)(f) GDPR); on the basis of your consent (Art. 6(1)(a) GDPR) and on the basis of a legal imperative or in the public interest (Art. 6(1)(c) and (e) GDPR).

#### WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Where appropriate and in accordance with local laws and requirements, we may share your personal data in various ways and for various reasons with the following categories of people:

- In the course of an investigation, complaint or procedure, to tax authorities, audit authorities, the Administration, Public Bodies, the Court, the Aliens and Borders Service ("SEF") and the Security Forces, who are responsible for the matter and, internally, to the areas or departments of the UBH Group that collaborate in gathering information and communicating the facts to the competent authority;

- Third-party service providers who carry out functions on our behalf (including external consultants, business partners and professional advisors such as lawyers, auditors and accountants, recruitment companies, technical support functions and IT consultants who carry out the following functions

technical support functions and IT consultants who carry out testing and development work on our company's technology systems);

- Third-party providers of outsourced IT and document storage services, where we have an appropriate processing contract (or similar protections);

- Platforms and marketing technology providers;

- In the event of the acquisition or disposal of businesses or assets, we may share your personal data with the potential acquirers of those businesses or assets.

- In the case of payments, credit institutions and other payment service providers, as well as technological service providers related to payment services to whom the data is transmitted in order to carry out the transaction, and who may be obliged by the legislation of the state in which they operate, or by agreements concluded by it, to provide information on transactions to the authorities or official bodies of other countries, located both inside and outside the European Union, in the context of the fight against terrorist financing, serious forms of organised crime and the prevention of money laundering.

Our website and our app provide you, under certain circumstances, with social plugins from various social networks. If you decide to interact with a social network such as Facebook, Instagram, Twitter, Google+ (for example, by registering for an account), your activity on our website or in our app will also be available to the respective social network. If you are connected to one of these social networks during your visit to our website or application or if you are interacting via one of the aforementioned social plugins, the social network may include this information in your profile on said social network, in accordance with its privacy settings. If you wish to avoid this type of data transfer, close your account session on the social network before entering our website or application or change your privacy settings whenever possible. We advise you to read the privacy policies of the social networks you use to obtain detailed information on the collection and transfer of personal information, to know your rights and which privacy settings are appropriate for your profile.

## **HOW DO WE SAFEGUARD YOUR PERSONAL DATA?**

We are committed to taking all reasonable and appropriate measures to protect the personal information we hold from misuse, accidental or unlawful alteration, loss and unauthorised disclosure or access. To this end, UBH uses security systems, rules and other procedures to ensure the protection of your personal data and to prevent unauthorised access, misuse, disclosure, loss or destruction.

If you suspect misuse, loss or unauthorised access to your personal information, please inform us immediately.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We only keep your personal data for as long as is necessary to fulfil the purpose for which we collected it, to respond to your needs, to your requests, or to comply with our contractual and legal obligations.

To determine the period for which we store your data, we use the criteria set out below. If several criteria apply at the same time, we will store your personal data in accordance with the criterion that implies that we will store your personal data for the longest period.

a) When you purchase products and services, we will keep your personal data for the duration of our business relationship, including any claims that may arise, as well as for a period of ten years after the termination of such relationship, without prejudice to the fulfilment of legal obligations of the data controller;

b) When you contact us to ask questions, request information and clarification, we will keep your personal data for the period necessary to resolve your question/provide you with the information and/or clarification requested;

c) When you create a customer account, i.e. when you register on our website, we will keep your data until you ask us to delete it or after a period of inactivity of two years;

d) When you have consented to the sending of direct marketing, we will keep your personal data for as long as the purpose for which it was collected is maintained or until you unsubscribe or ask us to delete it;

e) With regard to images captured by the video surveillance system, for a maximum period of thirty [30] days;

f) With regard to data collected during the recruitment process, for a maximum period of five [5] years after the recruitment process has ended;

g) With regard to the use of cookies, we retain them for as long as necessary to fulfil the purposes inherent to them, as detailed in the Cookies Policy;

h) The period provided for in the applicable legislation; or

i) Until the specific purpose applicable to certain data ceases to exist.

We may also retain some of your personal data to the extent that it is necessary for us to fulfil our legal obligations, as well as to administer or enforce our rights, namely through judicial or administrative proceedings.

In any of the aforementioned situations, if there are pending legal or administrative proceedings, the data will be kept for the duration of the proceedings and up to six months after the final judgement has been handed down.

At the end of the above retention periods, personal data will be deleted and/or erased in an absolutely secure manner.

## **HOW CAN YOU ACCESS, CHANGE OR REMOVE THE PERSONAL DATA YOU HAVE GIVEN US?**

One of the main aims of the GDPR is to protect and clarify the rights of EU citizens and people in the EU when it comes to data privacy. This means that you have a number of rights in relation to your data, even when you have provided them to us. These are described in more detail below.

We will endeavour to process your request without undue delay and, in any event, within one month (subject to any extensions permitted by law). Please note that we may keep a record of your communications to help us resolve any issues you raise.

**Right to object:** this right allows you to object to our processing of your personal data on grounds relating to your particular situation when your personal data is processed for one of the following reasons: (i)

our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials, including profiling; and (iv) scientific, historical, research or statistical purposes.

If you exercise your right to object, we will stop processing the data you have objected to, unless:

- We can demonstrate that we have compelling legitimate grounds for the processing which override your interests;

or

- We are processing your data for the establishment, exercise or defence of a right.

**Right to withdraw consent:** If we have obtained your consent to process your personal data for certain activities (for example, for marketing purposes), you may withdraw this consent at any time and we will no longer carry out the specific activity to which you have previously consented, unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

**Data Subject Access Requests:** You can ask us at any time to confirm the information we have about you, as well as request additional information on the purposes of processing, the period for which we keep your data, the existence of automated decisions, the recipients to whom the data is disclosed, among other information provided for in Article 15 of the GDPR. We may ask you to verify your identity and provide more information about your request. If we grant you access to the information we hold about you, we will not charge you for this access, unless your request is "manifestly unfounded or excessive". If you ask us for additional copies of this information, we may charge you a reasonable administrative fee, where this is legally permitted. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, you will always be informed of the reasons for doing so.

**Right to be forgotten/deleted:** In certain circumstances, you have the right to ask us to delete your personal data. Normally, the exercise of this right must fulfil one of the following criteria:

- The data is no longer necessary for the purpose for which we originally collected and/or processed it;

- When you have withdrawn your consent for us to process your data and there is no other valid reason for us to continue processing it;
- If you object to the processing and there are no overriding legitimate interests justifying it;
- The data has been unlawfully processed (i.e. in a way that does not comply with the GDPR); or
- It is necessary for the data to be erased in order to fulfil our legal obligations as data controller.

This right, however, does not apply, and therefore UBH may continue to process your data in a legitimate manner when this proves necessary:

- To exercise the right to freedom of expression and information;
- To fulfil legal obligations or to perform a task in the public interest or the exercise of official authority;
- For public health reasons in the public interest;
- For archiving, research or statistical purposes; or
- For the exercise or defence of a right.

When complying with a valid data erasure request, we will take all reasonable practical steps to erase the data.

**Right to restriction of processing:** In certain circumstances, you have the right to restrict our processing of your personal data. This means that we can only continue to store your data and cannot carry out further processing activities with it until: (i) one of the circumstances listed below is resolved; (ii) we have obtained your consent; or (iii) further processing is necessary for the establishment, exercise or defence of legal claims, the protection of the rights of another person or for reasons of important public interest of the EU or a Member State.

The circumstances in which you have the right to request that the processing of your personal data be restricted are:

- In the event that you contest the accuracy of the personal data we process about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- If you object to the processing of your personal data for our legitimate interests. In this situation, you can ask for the data to be restricted while we verify our grounds for processing your personal data;
- If our processing of your data is unlawful, but you prefer to restrict our processing of your data rather than have it erased; and
- If we no longer need to process your personal data, but need it for the establishment, exercise or defence of a right.

If we have shared your personal data with third parties, they will be notified of the restricted processing, unless this is impossible or involves a disproportionate effort. We will, of course, notify you before lifting any restriction on the processing of your personal data.

**Right of rectification:** You have the right to ask us to rectify any inaccurate or incomplete personal data we hold about you. If we have shared such personal data with third parties, they will be notified of the rectification, unless this is impossible or involves a disproportionate effort. Where appropriate, we will also disclose to you which third parties we have disclosed inaccurate or incomplete personal data. In cases where we consider it reasonable not to fulfil your request, we will explain the reasons for the decision. It is important that the personal information we hold about you is accurate and up-to-date. Please let us know if there are any changes to your personal information during the period in which we hold your data.

**Right to data portability:** If you so wish, you have the right to transfer your personal data between data controllers. This means that you can transfer the data from your UBH account to another online platform. To enable you to do this, we will provide you with your data in a password-protected, commonly used machine-readable format so that you can transfer the data to another online platform. Alternatively, we can transfer the data directly for you. This right to data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process on the basis of your consent or to fulfil a contract.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, which in Portugal is the National Data Protection Commission. You can contact it in the following ways:

Telephone (+351) 213928400 / Privacy Line: +351 21 393 00 39

E-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)

Online enquiries: [https://www.cnpd.pt/bin/Duvidas/Duvidas\\_frm.aspx](https://www.cnpd.pt/bin/Duvidas/Duvidas_frm.aspx)

Online submissions of complaints: [https://www.cnpd.pt/bin/Duvidas/Queixas\\_frm.aspx](https://www.cnpd.pt/bin/Duvidas/Queixas_frm.aspx)

Address: Rua de São Bento, no 148-3o, 1200-821 Lisboa

Fax: +351 21 397 68 32

If you wish to exercise any of these rights or withdraw your consent to the processing of your personal data (if consent is our legal basis for processing your personal data), please contact us. Please note that we may keep a record of your communications to help us resolve any issues you raise.

## How to contact us

If you wish to exercise any of the above rights, suspect misuse, loss or unauthorised access, or have any comments or suggestions on this Privacy Policy, you can contact us at the following addresses:

Unlock Thoughts, SA. - NIPC 513 923 195. Head Office: Rua do Bom Sucesso, 372 - 5o andar  
Porto, 4150-148 Porto

Alternatively, you can send us an e-mail to: [info@unlockhotels.com](mailto:info@unlockhotels.com)

How can you contact us to update your marketing preferences? You can do so by sending us an email to our general emails, or by clicking on the unsubscribe link in any marketing email we send you.

## HOW DO WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

Data is only transferred to other countries (countries outside the European Union) if this is necessary for the fulfilment of your orders or requests (e.g. payment orders or product shipments), if required by law or if you have given us express authorisation to do so.

express authorisation to do so. In the event that it is necessary to use service providers from third countries, they will be obliged to comply with the written instructions in this regard, by signing an agreement with the standard contractual clauses of the European Union, in order to comply with the level of data protection applicable in the European Union. You will receive detailed information from us, separately, where defined by law. We want to ensure that your data is stored and transferred securely. Therefore, we will only transfer data outside the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) when this complies with data protection legislation and the means of transfer provide adequate guarantees with regard to your data, for example:

- By means of a data transfer contract, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to controllers and processors in jurisdictions lacking adequate data protection laws; or
- By adhering to the EU-US Privacy Shield framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement regarding other jurisdictions;

or

- By transferring your data to a country where the European Commission has recorded a finding of an adequate level of protection in relation to that country's data protection levels through its legislation; or
- If you have consented to the transfer of data.

To ensure that your personal data receives an adequate level of protection, we have put in place appropriate procedures with the third parties with whom we share your personal data to ensure that your personal information is handled by those third parties in a manner that is consistent with and complies with data protection law.

#### Guarantees and warnings

The user guarantees that the personal data communicated to UBH is correct and accurate and undertakes to notify any changes or modifications thereto and assumes sole responsibility for losses and damages caused by erroneous, inaccurate or incomplete communication of the data. The user is expressly warned that by disclosing personal data on UBH public media such as Facebook, Google+, Twitter and Instagram, this information may be seen and used by third parties. UBH does not read any personal communications published on its customers' own websites.

#### **RECOMMENDED BROWSERS TO VIEW THE PAGE CORRECTLY**

The UBH website is optimised for viewing in Google Chrome, Safari, Mozilla Firefox, Microsoft Internet Explorer and Microsoft Edge.

#### **COOKIE POLICY**

What is a cookie?

A "cookie" is a file of information that is stored on your computer's hard drive and which records your browsing on a website so that, when you visit that site again, you can be presented with personalised options based on the information stored about your last visit. We may also use cookies on our website to analyse traffic and for advertising and marketing purposes, which do not harm your system. If you want to check or change the type of cookies you accept, you can do so in your browser settings.

How do we use cookies?

We use cookies to track your use of our website. This allows us to understand how you use the site and to track any patterns that emerge individually or from larger groups, which will help us to develop and improve our site and services in response to what our visitors want and need.

The cookies are:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser - they usually store an anonymous session ID allowing you to browse a site without having to log in to each page, but they do not collect any information from your computer;



- Persistent cookies: these are stored as a file on your computer and remain when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies from Google Analytics, Facebook and Mailchimp;
- Strictly necessary cookies: These are essential to enable you to use the website effectively and cannot be disabled. Without these cookies, the services available to you on the website cannot be provided. These cookies do not collect information about you that can be used for marketing purposes;
- Performance cookies: These cookies allow us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular;
- Functionality cookies: These allow our site to remember the choices you make (such as your username, language or region you are in) and provide enhanced functionality. For example, we may provide you with relevant news or updates on our website. These cookies may also be used to remember changes you have made to text size, font and other parts of web pages that you can personalise. They may also be used to provide services you have asked for, such as viewing a video. The information these cookies collect is usually anonymised;
- Personalisation cookies: These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the site you may see similar adverts to those you have previously browsed.

## **CONSENT**

Pursuant to Law No. 41/2004 of 18 August, the storage of information and the possibility of accessing information stored on a user's terminal equipment (namely through cookies) are only carried out by UBH if the user has given their consent prior and expressly to the installation of cookies on your equipment, we therefore ask you, prior to using the websites, to accept this Privacy and Cookies Policy.

How can I prevent the use of Cookies on websites?

The Customer has the right to withdraw consent to the use of cookies by UBH at any time, by deleting the cookies stored on your computer through the configuration options of your Internet browser.

You can consult this information for the main Internet browsers at the following addresses:

- ◆ Chrome: em <https://support.google.com/chrome/answer/95647?hl=pt>
- ◆ Explorer: em <https://support.microsoft.com/pt-pt/help/278835/how-to-delete-cookie-files-in-internet-explorer>
- ◆ Firefox: em <https://support.mozilla.org/pt-PT/kb/ativar-e-desativar-cookies-que-os-websites-utiliza>
- ◆ Safari: em [https://support.apple.com/kb/ph5042?locale=pt\\_PT](https://support.apple.com/kb/ph5042?locale=pt_PT)

Finally, if you wish to have greater control over the installation of cookies, you can install programs or add-ons to your browser, known as “do not track” tools, which will allow you to choose the cookies you wish to allow.

If the use of cookies is blocked or not authorized, no cookie will be stored on your equipment, but the proper functioning of our websites is not guaranteed, meaning the customer will not be able to derive maximum benefit from the content available on NICI websites. With each new access to the website, you will always be asked for authorization to use cookies.

#### **DECLARE, EXERCISE OR DEFEND RIGHTS**

It may sometimes be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with the exercise or defense of rights. Article 9(2)(f) of the GDPR allows this processing when “it is necessary for the establishment, exercise or defense of a right in legal proceedings or whenever courts act in the exercise of their judicial function”.

This may arise, for example, where we need to obtain legal advice in relation to legal proceedings or where we are required by law to retain or disclose certain information as part of a legal process.

#### **CHANGES TO THE DOCUMENT**

UBH may occasionally change this statement and its Privacy Policy to reflect the company's image and customer feedback. We encourage our customers to periodically review our Privacy Policy to be up to date with how UBH protects their information, without prejudice to informing you whenever there are relevant changes to our Privacy Policy.

#### **CONTACTS**

UBH welcomes your comments regarding this Privacy Policy. If you believe that UBH has not complied with this statement, please contact us. We will try to evaluate your suggestion and respond to you as quickly as possible.