

# Privacy Policy

For Enotel Hotels & Resorts, the privacy and security of the personal data of guests, investors, Enotel Club members, visitors and other partners is of crucial importance to the company.

This policy applies to all systems, people, and processes that make up the Enotel Hotels & Resorts information system. The commitment to the security of personal data has been made by the management of Enotel Hotels & Resorts and extends to all employees of the organization. Enotel Hotels & Resorts, promotes information security and protection in the processing of personal data held by the institution and collected by operators and traditional travel agencies and online operators (OTA), online reservation center (built on the site).

When processing personal data we respect Your privacy, we reiterate our commitment to implementing compliance measures, in particular to ensure:

- (a) lawful processing supported by a legal basis, legitimate interest or consent of the data subject;
- (b) that processing is limited to the purpose for which the data were made available;
- (c) that there are mechanisms for the accuracy and completeness of the data provided by you;
- (d) the minimization of the required data, requesting only those suitable for the purpose;
- (e) limiting the storage of data according to the defined retention time;
- (f) the implementation of measures for the integrity and confidentiality of information.

Enotel Hotels & Resorts is defining procedures for company compliance with the principles outlined above and requirements of the new Personal Data Protection Regulation (RGPD) for existing information systems and for prior impact assessment and implementation privacy measures in new data processing to be carried out in the future.

For more detail about how we collect, use, share and protect the personal data we obtain, please see the following sections of this Privacy Policy.

## 1. Enotel Hotels & Resorts

Enotel Hotels & Resorts is a hotel group with a presence in Madeira Island, Portugal and Brazil that is dedicated to guest accommodation and related services, such as catering, wellness and leisure.

The person responsible for the processing of personal data at Enotel Hotels & Resorts is Enotel - Management, S.A, headquartered in 29 Simplício dos Passos Gouveia Street, 9004-576 Funchal, legal person nº 511062060.

## 2. Personal Data categories handled by Enotel Hotels & Resorts

In order to perform its duties and provide personalized service during the stay, Enotel Hotels & Resorts deals with the following categories of personal data Identification data (e.g., name, passport number);

- a) Identification data (e.g., name, passport number);
- b) Demographic data (e.g., gender, date of birth, nationality, and country of residence);
- c) Contact details (e.g. address, mobile phone, email)Dados financeiros (e.g. Cartão de Crédito)
- d) Sensitive data, at customer's option (e.g. dietary restrictions, personal preferences, health history);
- e) Financial data (e.g. Credit Card)

## 3. Purposes, grounds for processing and retention periods for personal data

In pursuing its duties, by contractual relationship, legal obligation and / or legitimate interest, Enotel Hotels & Resorts may treat Your personal data for the purposes described in the table below.

<b>Purpose of treatment</b>	<b>Data Category</b>	<b>Foundation of legality</b>	<b>Retention Deadline</b>
Reservation management; Invoicing; Charge management and credit recovery; Promoting a stay that suits the interests and safety of guests.	Identification Data Contact Details Financial Data Sensitive Data	Pre-contractual arrangements, performance of a contract and post-contractual due diligence arising from the provision of the service.	On individual reservations - 3 (three) months  In group bookings - 4 (four) months  The deadline may be higher to ensure rights or duties related to the contract or if there is a lawsuit or legal obligation to comply.
Personalized intervention in SPA treatments	Identification data Contact Details Sensitive Data	Pre-contractual inquiries, performance of a contract and post-contractual due diligence arising from the provision of the service.	3 (three) months.  The deadline may be higher to ensure rights or duties related to the contract or if there is a lawsuit or legal obligation to comply.
Compliance with legal obligations, in particular with the authorities, among others, supervision, tax and fiscal, judicial and police.	Identification Data Contact Details Financial Data	Legal obligation.  For declaration, exercise or defense of rights in judicial process.	Applicable legal deadline at the time for each legal obligation and legal to comply  Until the expiration of the period of limitation for the exercise of rights.
Security of people and property through video surveillance system	Identification data	Legitimate interest	30 (thirty) days after image capture.  The deadline may be higher to ensure rights or duties related to the contract or if there is a lawsuit or legal obligation to comply.
Customer segmentation and direct marketing for advertising and sending Enotel Hotels & Resorts promotional offers	Identification data Contact Details Financial Data	Legitimate interest in developing and growing the activity of the person responsible for processing and making promotional offers available to customers.	Permanent preservation, unless objected by the data holder.

Purpose of treatment	Data Category	Foundation of legality	Retention Deadline
<p>For Enotel Club Data Holders</p> <ul style="list-style-type: none"> <li>Sending promotional offers</li> </ul>	<p>Identification data</p> <p>Contact Details</p>	<p>Legitimate interest in the development and growth of the activity of the person handling and making promotional offers available to members.</p>	<p>Permanent preservation unless objected by the data subject.</p>
<p>For Enotel Club Data Holders:</p> <ul style="list-style-type: none"> <li>Contract management;</li> <li>Invoicing;</li> <li>Promotion of a stay appropriate to the interests and safety of guests</li> </ul>	<p>Identification data</p> <p>Contact Details</p> <p>Financial Data</p> <p>Sensitive Data</p>	<p>Pre-contractual due diligence, contract execution and post-contractual due diligence arising from the provision of the service.</p>	<p>While the contract is in progress.</p> <p>The deadline may be higher to ensure rights or duties related to the contract or if there is a lawsuit or legal obligation to comply.</p>
<p>Event organization and management</p>	<p>Identification data</p> <p>Contact Details</p>	<p>Pre-contractual due diligence, contract execution and post-contractual due diligence arising from the provision of the service.</p>	<p>While the contract is in progress.</p> <p>The deadline may be higher to ensure rights or duties related to the contract or if there is a lawsuit or legal obligation to comply.</p>
<p>For business, marketing, and contacts related to business or marketing campaigns.</p>	<p>Identification Data</p> <p>Contact Details</p>	<p>Explicit consent</p>	<p>Until consent has been given by the data holder.</p>
<p>Retention of your personal preferences to ensure a personalized welcome for future stays:</p> <p>(e.g. sports, leisure, cultural preferences, dietary restrictions or preferences, special physical needs)</p>	<p>Identification Data</p> <p>Contact Details</p> <p>Sensitive Data</p>	<p>Explicit consent</p>	<p>Until consent has been given by the data holder.</p>

The processing of personal data of children under 13 is only carried out with the consent of parents or guardians for parental ownership.

#### 4. Data processing purposes through the website <https://www.enotel.com/>

Enotel Hotels & Resorts offers through the website <https://www.enotel.com/>, for the convenience of its users, the possibility of interaction and online reservations.

Purpose of treatment	Data Category	Foundation of legality	Retention Deadline
Subscription of promotional offers through online form.	Identification Data Contact Details	Explicit consent	Until consent has been given by the data holder.
Online Booking	Identification Data Contact Details Financial data	Pre-contractual Due Diligences	On individual reservations: 3 (three) months Nas reservas de grupo: 4 (cuatro) meses The deadline may be higher to ensure rights or duties related to the contract or if there is a lawsuit or legal obligation to comply.

## 5. Cookie Policy

To ensure normal operation and customization the site may use cookies.

In each site will be presented a Cookie Policy, with the details of the cookies used in that site, namely:

- Types of cookies;
- Purpose of using cookies;
- The retention period of the collected data;
- How consent can be withdrawn

For all cookies requiring consent, prior consent will be obtained from the user to apply cookies.

The method to remove the consent of the user cookies will be as easy as giving consent.

We use our own and third party cookies to optimize your visit and improve our services by customizing our content and advertising based on your location and analysis of your browsing habits. If you continue browsing without modifying your browser configuration, we consider that you accept its use.

Our site (<https://www.enotel.com/>) uses cookies, it means small files stored on your computer that monitor activity while using our site, providing essential data to make navigating your site simpler. When stored on your computer, cookies allow you not to enter all data each time you use the site. This data allows us to customize the site to your preferences and navigate to your needs.

If you do not want cookies to be stored on your computer, you can use your browser settings to oppose cookies on our site. To learn how to configure your browser settings to manage your cookies, browse the help of the browser you are using. You may delete cookies already on your device at any time, but be aware that disabling cookies may restrict certain features that will prevent you from navigating to your preferences.

Various types of cookies are used namely:

- a) **“Required” Cookies** - Without these cookies, the intended services cannot be provided. They do not identify you and are used to understand your interaction with the site, such as preferences and navigation flow.

- b) **Performance Cookies** - They do not identify you and are intended to understand your behavior anonymously.
- c) **Functional Cookies** - They keep your preferences regarding the use of the site, so you do not have to re-configure the site each time you visit it. It may collect data with your consent such as your encrypted email or identification.
- d) **Advertising Cookies** - Target advertising based on the interests of each user and allow user identification through their browser or mobile device, limiting the amount of time they see the ad, helping to measure the effectiveness of advertising and the success of the website organization.
- e) **Third Party Cookies** - These measure the effectiveness of third party advertising and may contain personal data. Your email or identification can be shared anonymously, allowing your partner to target advertising accurately.

## 6. Transfer of personal data to other entities

In order for Enotel Hotels & Resorts to be able to fulfill its mandate and in order to provide you with quality service, you may have to disclose or give access to your personal data to other entities:

In such cases, Enotel Hotels & Resorts will only transmit your personal data to the following recipient categories:

- a) Entities and authorities to whom the personal data are to be reported under legal obligation (SEF and police)
- b) Tax Authority
- c) Entity responsible for the reservation center application of the website <https://www.enotel.com/>
- d) Other entities required for management and operation, namely: accounting, computer assistance, computer security, communications.
- e) In the event of reorganization, sale or merger we may transfer the information collected to the third parties involved.
- f) Enotel Group companies, namely in Brazil, the international transfer of data for commercial, marketing and contacts related to commercial campaigns.

## 7. Rights of Data Holders

Customers, as data holders, enjoy the following rights:

### 7.1. Right of access

Upon request, you may obtain information that your personal data are processed by Enotel Hotels & Resorts. You can also access your personal data, as well as obtain the following information:

- The purposes for which your personal data are processed;
- The type of personal data that is processed;
- The entities to whom your personal data may be communicated, including entities from the European Union or international organizations;
- The period of retention of your data or, if this is not possible, the criteria for setting this period;
- The rights you enjoy in relation to the processing of your personal data;
- If personal data have not been obtained from you, information about the origin and type of data concerned;

### 7.2. Right of rectification

Whenever you consider that your personal data (provided by you) is incomplete, you may request it to be completed, or you may request rectification if it is found to be incorrect. (e.g. address, tax ID, contacts, personal preferences).

### 7.3. Right to delete

In certain circumstances the data holders may request the deletion of their personal data. Enotel Hotels & Resorts will advise whether or not this right can be met against existing retention obligations through legal enforcement or legitimate interest.

#### 7.4. Right to treatment limitation

The right to limitation of the processing of personal data allows you to ask the controller thereof which restricts the scope of access and processing of your personal data or to suspend the activities of treatment. May require limiting the processing of personal data in the following cases:

- to contest the accuracy of your personal data for a period of time which allows the Enotel Hotels & Resorts check its accuracy;
- if the Enotel Hotels & Resorts will no longer need the personal data for purposes of treatment, but if this information is necessary for the purposes of establishment, exercise or defense of legal claims.

#### 7.5. Right to portability

You may request the Enotel Hotels & Resorts to deliver, in a structured format, current use and automatic reading of personal data provided by you. You also have the right to ask Enotel Hotels & Resorts to transmit this data to another controller, provided that this is technically possible.

The right to portability only applies in the following cases:

- when treatment is based on explicit consent or performance of a contract;
- when the treatment in question is carried out by automated means.

#### 7.6. Opposition Right

You have the right to object to the processing of your personal data at any time for reasons relating to your particular situation, and when the processing is performed for purposes other than those for which the data were collected, but which are compatible with them.

In such cases, Enotel Hotels & Resorts will cease to process your personal data unless it has legitimate reasons for such processing and if it takes precedence over your interests.

The exercise of its right of opposition may entail the suspension or termination, in whole or in part, of the benefits associated with the purpose of processing the data concerned.

You can also oppose the processing of their data for direct marketing purposes.

#### 7.7. Right to remove your permission

In case of data processing is based on your consent, you may cancel your consent at any time.

If you withdraw your consent, your personal data will no longer be processed unless there are other grounds, such as legal and regulatory obligations or the public interest of Enotel Hotels & Resorts, which justify such processing.

#### 7.8. Right to present complaints to Enotel Hotels & Resorts or supervisory authority

The exercise of your rights is free of charge unless the request is manifestly unfounded or excessive and in such cases a reasonable fee may be charged for the associated costs.

The answer to your requests must be made within a maximum of 30 days, unless it is a particularly complex request, in which case the period may be longer.

Enotel Hotels & Resorts has appointed a Personal Data Protection Officer, in accordance with Articles 37, 38 and 39 of the General Data Protection Regulation. You can contact the Enotel Hotels & Resorts DPO and exercise your rights through the following channel:

- **Email:** by email to [dpo@enotel.com](mailto:dpo@enotel.com);

- **Post Office:** 29 Simplicio dos Passos Gouveia Street, 9004-576 Funchal – Madeira Island / Portugal

If you wish to make a complaint regarding matters relating to the processing of your personal data you may do so with the National Data Protection Commission, the competent supervisory authority in Portugal ([www.cnpd.pt](http://www.cnpd.pt))

## **8. Changes to this policy**

Enotel Hotels & Resorts may change this Privacy Policy at any time to reflect current privacy practices. When we make changes to this statement, we review the “update date” in the document footer. We encourage you to periodically read this Privacy Policy so that you know how Enotel Hotels & Resorts protects your information.