



PRIVACY POLICY SUBLIME

STAY, LDA

1. Our commitment

SUBLIME STAY, LDA., a limited company, with main office in Hotel Sublime Comporta, Estrada Nacional 261-1, Caixa Postal 3954, Muda, 7570-337 Grândola, and single registration and legal person number 510677185, the entity that exploits SUBLIME COMPORTA, is carrying out the implementation of a personal data protection system through technical and organisational measures.

With the aim of fulfilling the transparency obligations regarding the entry into force of the General Regulation on Data Protection (GRDP) on May 25th 2018, the present PRIVACY POLICY is meant to provide clear and objective information about the personal data that SUBLIME COMPORTA collects, the purposes that it can use them for, the way that it treats them, whom it shares them with, how long it keeps them and how you may contact us and exert your rights.

It is extremely important that you read and give express consent for maintenance and treatment of your personal data. Only giving your free, specific and informed consent can you keep receiving information about SUBLIME COMPORTA (newsletters, promotions, campaigns etc.)

In addition, one must clarify that simple navigation or access to the website <http://www.sublimecomporta.pt> does not necessarily entail *cookies* or collection of your personal data. Nevertheless, bookings imply making available personal data.

As for the use of cookies, when you visit our site your consent will be required to create and record in your computer a text file (cookie). This file will allow greater ease and speed in access to the site, as well as customisation in accordance with your preferences. Most browsers accept these files (cookies), by the User may delete them or automatically define their blockage. In the "Help" menu of your browser you will find how to make those configurations. Nevertheless, if you do not allow the use of cookies there may be some functionalities of the site that you will not be able to use.

2. Definitions

«**Personal data**» information about a natural person identified or identifiable («holder of the data»); a natural person is deemed identifiable if they can be identified, directly or indirectly, especially by reference to an identifier. Personal identifiers are deemed to be, for example, a name, identification number, location data, digital identifiers or one or more specific elements of the physical, physiologic, genetic, mental, economic, cultural or social identity of that natural person.

«**Treatment of Personal data**» an operation or set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, record, organisation, structuration, preservation, adaptation or alteration, recovery, consult, use, divulgation by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, deletion or destruction.

3. Entity responsible for treatment of data and subcontracted entities

SUBLIME is the entity responsible for treatment of personal data provided by users in the terms and for the purposes provided in GRDP, committing not to share them with third parties without prior consent.

To contact the Data Protection Officer, you must send an e-mail to pd@sublimecomporta.pt or use the general contacts of SUBLIME COMPORTA, describing the matter and providing a contact.

Within the treatment of personal data, SUBLIME COMPORTA uses or may use third-party entities that it subcontracts, to, in its name and in accordance with the instructions provided, carry out treatment of personal data, in the terms legally required and of the present Privacy Policy, namely through a written contract that will govern the type of personal data, as well as the duration of the respective treatment, nature and purpose.

The subcontracted entities cannot transmit said data and subcontract the respective treatment to third parties, without prior consent in writing from SUBLIME COMPORTA.

SUBLIME COMPORTA will only subcontract treatment of personal data with entities that guarantee utter safety in matters of treatment of personal data.

4. Receivers and transfer of data

Except for purposes of fulfilment of legal obligations, there will be in no case any communication of personal data to third-party entities that are not subcontracted entities or legitimate receivers,

Any transfer of personal data to a third-party country or international organisation will be carried out only for purposes of fulfilment of legal obligations or having guaranteed conformity with the GRDP.

5. Collection and treatment of data

SUBLIME COMPORATA may collect data directly from the user or indirectly through third-party entities.

Direct collection may be made in presence, by telephone, by e-mail and through the website. Indirect collection happens when partner entities or third parties, such as travel agencies, sent for example data on bookings made in their websites.

The personal data that SUBLIME COMPORATA collects and treats consist of information about the name, telephone, mobile phone, e-mail, address, fiscal identification, citizen card/passport, credit card data (collected for purposes of invoicing only).

Collection and treatment of personal data by SUBLIME COMPORATA is aimed at bookings, divulgation of offers, divulgation of campaigns and provision of hotel services and associated services (restaurants, bars and spa).

6. Use and purposes of treatment of data

SUBLIME COMPORATA will treat your personal data only in situations in which:

1 – It has a legitimate interest to do so, in conformity with the applicable legislation and your rights, namely for:

- Correct identification of users that make bookings;
- Development and maintenance of our website;
- Management of contacts;
- Sending newsletters, opinion surveys or other information;
- Inform about products and services offered, special offers and campaigns and, in general, for purposes of marketing, through any means of communication, including digital support;
- Ensure safety of the network and information.

2 – It has obtained your consent to treat your personal data for specific purposes, explicit and legitimate;

3 - Treatment is necessary to make a contract that they are party to;

4 – It is necessary to fulfil legal obligations applicable to you.

The personal data that you provide may be treated for other purposes only if they are duly stated at the moment of collection of data.

7. Preservation of data

SUBLIME COMPORATA will preserve your data only during the time strictly needed to pursue the purposes that they are meant for.

Nevertheless, in certain cases we may preserve data for a longer period, namely when

the Law so requires.

8. Rights of holders of personal data

At any moment you may:

1. Request **access** to the data that SUBLIME COMPORTA keeps about you, and in that scope, if you obtain information about whether they are the object of treatment, the respective purposes, the type of data in question, receivers or categories of receivers whom the personal data are or will be disclosed to, the time of preservation of data and, if the data were not collected directly, information available about the origin thereof;
2. Request **rectification** of your personal data if they are inaccurate or incomplete;
3. Request **elimination or deletion** of your personal data (“Right to oblivion”);
4. Request **limitation of treatment** of your personal data;
5. **Object** to treatment of your personal data;
6. Request **portability** of your personal data;
7. Withdraw your **consent** to treatment of your personal data, whenever treatment depends on consent.

If consent is legally required for treatment of personal data, the holder of the data has the right to withdraw consent at any time, although that right does not compromise the lawfulness of treatment made on the base of consent previously given nor later treatment of the same data, based on another legal base, as is the case of fulfilment of contract or legal obligation that SUBLIME, LDA is subject to.

If you wish to exert any of your rights, you must contact us through the e-mail pd@sublimecomporta.pt or by mail to the address Hotel Sublime Comporta, Estrada Nacional 261-1, Caixa Postal 3954, Muda, 7570-337 Grândola.

We commit to treating your requests with special care and utter celerity.

Additionally you are entitled to submit a claim by record in the Book of Claims or directly address the National Commission on Data Protection (CNPD).

9. Safety and confidentiality

Personal data are processed and stored digitally and, at times, in hard copy.

SUBLIME COMPORTA undertakes the commitment of guaranteeing safety and protection of personal data that you send us through the aforementioned communication channels, or that reach us indirectly, having taken the adequate measures required for that purpose, namely: a) protection with *passwords*, b) use of digital certifications, c) restrictions on physical entry in places where the servers to store personal data are located; d) firewalls e) safe communication through https protocol.

These safety measures will be reviewed and updated according to the needs and requirements of these matters.

If, for any reason, there is a violation of safety that causes, accidentally or unlawfully, destruction, loss, alteration, unauthorised divulgation or access to personal data, SUBLIME COMPORTA commits, in the terms of the applicable legislation, to communicate the violation to CNPD, with no unjustified delay and, whenever possible, within 72 hours of becoming aware of that occurrence. And also, to communicate violation of personal data to the respective holder of the data.

10. Alterations to the Privacy Policy

SUBLIME COMPORTA reserves the right to, at any time, make readjustments or alterations to the present Privacy Policy. Any alterations will be duly published in the present website. We request that you periodically review this document to keep up to date.

If you have any doubt about the treatment of your personal data, or wish to exert any of your rights, please contact us through the Data Protection Officer (pd@sublimecomporta.pt), through the telephone 269 449 376 or by written communication addressed to the Data Protection Officer to Hotel Sublime Comporta, Estrada Nacional 261-1, Caixa Postal 3954, Muda, 7570-337 Grândola.