

Privacy Policy

Royal Lido Resort S.A., the management company of HOTÉIS ROYAL ORCHID, ROCAMAR and CAIS DA OLIVEIRA, hereinafter RLR, is the entity responsible for collecting and processing personal data (namely, identification, contact and sensitive data, among others), undertaking to ensure the protection of your privacy, acting in accordance with the law and the General Regulation on the Protection of Personal Data.

This Privacy Policy consolidates our commitment to adopting practices in line with compliance, with a focus on ensuring that:

- personal data will be processed lawfully, based on applicable legal grounds, legitimate interest or with the express consent of the data subject;
- the use of data will be strictly limited to the purposes for which it was made available;
- appropriate mechanisms will be adopted to ensure the accuracy, updating and completeness of the data provided;
- the principle of minimisation will be observed, restricting collection to only the data necessary and relevant to the purpose;
- data storage will comply with legally or contractually defined retention periods;
- technical and organisational measures will be implemented to ensure the integrity, confidentiality and protection of information.

RLR has developed and implemented this Privacy Policy, which includes a comprehensive set of measures aimed at protecting personal data. The purpose of this document is to provide, in an organised and accessible manner, the principles and guidelines that drive this policy.

Entity Responsible for Processing Personal Data:

Royal Lido Resort S.A (RLR), headquartered at Travessa Vista da Praia, 9125-039 Caniço, fiscal identification number 509 375 634, in compliance with the legal obligation set forth in Article 37 document 1 line a) of the GDPR and Article 12 of the National Enforcement Law, is responsible for processing personal data processing activities carried out by RLR with applicable legislation and this Policy.

Data subjects may, whenever they consider it necessary, contact RLR to address issues related to the processing of their data, using the contact details provided. Personal data subjects may, whenever they deem necessary, contact RLR to address issues related to the processing of their data, using the contact details provided.

How information is collected and stored:

Personal data may be collected through the following processes:

- Direct collection: Email, website, telephone calls, in person
- Indirect collection: Through partners or group companies and official entities.

The data collected is processed and stored electronically in strict compliance with personal data protection legislation and is stored in specific databases created for this purpose by RLR or by entities subcontracted by it. Some personal data collected on the website is mandatory, and in the event of missing or insufficient data, RLR may not be able to provide you with the services or information you have requested. In each specific case, RLR will inform you of the mandatory nature of providing the personal data in question.

Data processing inventory

RLR has a data processing register, in accordance with Article 30 of the GDPR, which includes:

- who is responsible for data processing and how they can be contacted;
- the purposes for which the data is used;

- the types of data processed and the people they concern;
- how long the data is stored;
- the security measures applied to ensure the protection, confidentiality and reliability of the information.
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Categories of Personal Data Processed by RLR

While providing its services, RLR may collect and process the following categories of personal data:

- Identification data: such as name, civil identification number, passport number, and tax identification number;
- Demographic data: such as date of birth, gender, nationality, and country of residence;
- Contact details: including address, telephone number and email address;
- Sensitive data (provided voluntarily by the customer): such as dietary restrictions, personal preferences or information about health conditions and treatments (e.g. guests undergoing medical treatment);
- Financial data: such as credit card information;

Statement of reasons for processing personal data

RLR only processes your personal data in specific situations, such as:

- **With your consent:** when you clearly and precisely authorise us to use your data for specific purposes. This consent may be given in writing, online or by other means, and will always be recorded.

You may withdraw your consent at any time, without affecting the use that has already been made of your data up to that point.

- **To perform a contract or provide a service:** when it is necessary to process your data to fulfil a contract with you or to take the necessary steps before entering into that contract, at your request.
- **Compliance with legal obligation:** RLR may process personal data when necessary to comply with obligations under the law.

Example: sending data to official entities, such as SEF/AIMA (under the terms of Decree-Law No. 128/2014) or police authorities;

- **Legitimate interest:** RLR may also process data when necessary to ensure its own or third parties' legitimate interests, provided that these interests do not override the fundamental rights and freedoms of the data subject.

The table in the section 'Purposes of processing, legal framework and retention periods for personal data' sets out the legal basis applied in each situation.

Purposes of personal data processing

RLR only uses your personal data when there is a valid reason, such as fulfilling a contract, complying with the law or responding to legitimate interests.

The specific purposes are indicated in the table in the section 'Purposes of processing, legal framework and retention periods for personal data'.

RLR undertakes not to use your data for other purposes.

Retention periods for personal data

RLR may retain personal data beyond the duration of the contractual relationship when:

- the holder has given their consent;
- it is necessary to ensure rights or fulfil obligations arising from the contract;
- or when there are legitimate interests that justify it.

In any case, the data will only be stored for as long as is strictly necessary for the purposes for which it is intended and in accordance with the guidelines and decisions of the National Data Protection Commission (CNPD).

The specific retention periods can be found in the table in the section 'Purposes of processing, legal framework and retention periods for personal data'.

Purposes of processing, legal framework and retention periods for personal data

Purposes of the treatment	Data Category	Legal Basis	Retention period
Clients: Guests			
Reservations; Hotel stay management and monitoring; Billing; Quality and customer satisfaction;	Identification data Contact details Demographic data Financial data Holiday and family data Sensitive data	Contractual; Pre-contractual; Contractual; Post-contractual arising from the provision of the service; Consent.	Permanent, until the Data Holder exercises their rights of opposition and only after three months from check-out. The period may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The period may also be longer if there is an ongoing legal proceeding. Documents relating to courtesies collected by the room cleaning team after check-out will not be kept for more than twenty-four hours (e.g. welcome letters)
Amenities such as: *Communication for delivery of lost and found items; *Birthdays *Thank you notes *Welcome letters	Identification data Contact details Demographic data	Legal interest	
Storage of personal data and preferences for personalised service in future interactions	Identification data Contact details Demographic data Financial data Holiday and family data Sensitive data	Legal interest	
For commercial, marketing and contact purposes related to commercial or marketing campaigns.	Identification data Contact details	Agreement	Until consent is revoked by the data holder.
- Notification to SEF/AIMA	Identification data Contact details Demographic data Holiday and family data	Legal obligation	Thirty days after submission to SEF/AIMA.
- Invoicing, accounting records and related supporting documents for reporting to authorities (e.g. AT)	Identification data Contact details Demographic data Holiday and family data Financial data	Legal obligation: With the authorities (supervision, tax and fiscal, judicial and police or others) Or For declaration, exercise or defence of rights in legal proceedings.	Legal deadline required as defined by each specific legal obligation.
- Seguro Responsabilidade Civil - Acidentes	Identification data Contact details Sensitive data	Contractual relationship; Legitimate interest; Vital interest of the data subject;	Three years after the incident was sorted out.
Clients: SPA			
SPA Treatments (Health Questionnaire)	Identification data Sensitive data	Pre-contractual; Contractual; Post-contractual arising from the provision of the service;	Thirty days The period may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The period may also be longer if there is an ongoing legal proceeding.

Clients: Gym			
Use of the Gym (Health Questionnaire)	Identification data Sensitive data	Pre-contractual; Contractual; Post-contractual arising from the provision of the service;	Thirty days The period may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The period may also be longer if there is an ongoing legal proceeding.
Clients: Time-share			
Time Share contract management - Customer database - Fraction sharing: RCI submission Change of owners	Identification data Contact details Demographic data Financial data Holiday and family data Sensitive data	Pre-contractual; Contractual; Post-contractual arising from the provision of the service; Legal obligation	End of contract Legal deadline required as defined by specific legal obligations. Deadlines may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The deadline may be even longer if there is an ongoing legal proceeding..
Stays / Booking plan	Identification data Contact details Demographic data Financial data Holiday and family data Sensitive data	Contractual; Pre-contractual; Contractual; Post-contractual arising from the provision of the service;	Three years after the stay The period may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The period may also be longer if there is an ongoing legal proceeding.
Clients: Events			
Organisation of events through the provision of services to clients	Identification data Contact details Financial data Sensitive data	Contractual; Pre-contractual; Contractual; Post-contractual arising from the provision of the service;	During the term of the contract The period may be longer to ensure rights or duties related to the contract or if there is a legal proceeding or legal obligation to comply with.
Clients: Guests, SPA, Gym, Events			
Communication to authorities (Tax File)	Identification data Demographic data Financial data	Legal obligation: With the authorities (supervisory, tax and fiscal, judicial and police or others) Or for the declaration, exercise or defence of rights in legal proceedings.	Legal deadline required as defined by each specific legal obligation.
Purposes of the treatment	Data Category	Legal Basis	Retention period
Quality - Review analysis - Evaluation of satisfaction after stay	Identification details Contact details	Legal interest	12 months.

Service Providers			
Access and attendance control	Identification details Professional details	Contractual; Post-contractual arising from the provision of the service;	Three months. The period may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The period may also be longer if there is an ongoing legal proceeding.
Maintenance Services	Identification details Professional details	Contractual; Post-contractual arising from the provision of the service; Legal obligation	Legal deadline required as defined by each specific legal obligation.
Communication to authorities (Tax File)	Identification details Professional details	Contractual; Post-contractual arising from the provision of the service; Legal obligation	Legal deadline required as defined by each specific legal obligation.

Customers, Service Providers, and Other Data Subjects:

Categories of data subjects	Purpose of Processing	Data Category	Legal Basis	Retention period
Data holders who visit RLR's premises	Safety of people and property through video surveillance systems	Identification details	Legal interest	Thirty days after the image was captured. The period may be longer if there is a legal proceeding or a legal obligation to comply with.
Exercising Data Subject Rights	Registration and management of requests to exercise data holders' rights	Identification details Contact details	Legal obligation	Up to three years from the date of submission of the request to exercise rights by the data holder. The period may be longer to ensure rights or duties related to the contract or to comply with legal obligations. The period may also be longer if there is an ongoing legal proceeding.

Job/internship candidates:

Purposes of the treatment	Data Category	Legal Basis	Retention period
Recruitment process (collection of CVs and spontaneous applications)	Identification data; Contact details; Demographic data; Curriculum vitae data;	Pre-contractual procedures and/or consent of the data holder for the assessment of the profile and skills of the candidate for the job position and retention for future offers. Legal Obligations	One year from the date of data collection. With the exception of data required to comply with the provisions of Article 32 of the Labour Code, which is stored for five years.

Data Holders who use the RLR Group website (<https://www.rocamarlidoresorts.com>)

Categories of data holders	Purpose of processing	Data category	Legal basis	Retention period
Customers, Business partners or service providers (as individuals), Human Resources candidates, Other data subjects who contact RLR via the 'Contact Us' form.	Requests for information, suggestions, compliments, complaints or reservations via the 'Contact us' form.	Identification data Demographic data Contact details	Pre-contractual procedures, contract execution and post-contractual procedures arising from the provision of the service. Legitimate interests	Time strictly necessary to fulfil the request. The time limit may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to comply with.

Categories of data holders	Purpose of processing	Data category	Legal basis	Retention period
Clients	Subscription to promotional offers via online form.	Identification data Demographic data Contact details	Agreement	Until consent is revoked by the data subject.
Clients	Reservas online	Identification data Contact details Demographic data Financial data Holiday and family data Sensitive data	Pre-contractual formalities	Three months after check-out

Use of Cookies

Cookies:

It is important to read this policy, as by continuing to browse our website you agree to the use of cookies on your browser and devices, unless you have disabled them.

What are cookies:

Cookies are small software tags that are stored on your computer or other devices you use to access the internet through your browser.

Find out more about cookies at: allaboutcookies.org.

What cookies are used for:

Cookies are used to improve the user's browsing experience, increasing the speed and efficiency of website responses. They eliminate the need to repeatedly enter the same information and help determine the usefulness, interest and number of uses. Each cookie has a function and an expiry date. ROYAL LIDO RESORT S.A. will not use data stored in cookies without prior consent in cases where this is required.

What cookies are used on our website:

This site uses proprietary and third-party cookies. Third-party cookies differ from the former in that they are sent to the user's device from a device or domain that is not under the direct control or management of ROYAL LIDO RESORT S.A.

Transfer of data to third parties

RLR reserves the right to subcontract external entities which, acting on its behalf and in accordance with the instructions provided, will process the data subject's personal data in strict compliance with the GDPR, applicable national legislation and this Policy.

Subcontractors are prohibited from transmitting the data subject's data to third parties without the prior express written authorisation of RLR, as well as from resorting to other entities without such consent.

RLR undertakes to ensure that such subcontractors provide sufficient guarantees of the implementation of appropriate technical and organisational measures to safeguard the privacy of personal data and the protection of data subjects' rights.

Subcontractors are bound to RLR by a written contract, which sets out the purpose and duration of the processing, the nature and purpose thereof, the type of personal data processed, the categories of data subjects, the rights and obligations of the parties — in particular the duty of confidentiality — and the security measures to be implemented.

In the exercise of its duties, RLR may hire subcontractors in various areas, namely: financial and accounting advice, project consulting, professional training, maintenance services, insurance brokerage, legal advice, communication and image, internet and communications services, among others.

RLR may also transmit personal data to third parties, namely to entities to which communication is mandatory under applicable legislation, such as SEF/AIMA, the Tax Authority, the Court of Auditors, police authorities, courts, among other competent bodies.

Data holders' rights

RLR ensures that data subjects can exercise their rights under the applicable personal data

- **Right of access:** data subjects have the right to obtain confirmation as to whether or not personal data concerning them are being processed and, where that is the case, the right to access their personal data and obtain the following information:
 - (i) The purposes for which their personal data is processed;
 - (ii) The type of personal data that is processed;
 - (iii) The entities to whom their personal data may be communicated, including entities in the European Union or international organisations;
 - (iv) The period for which their data will be stored or, if this is not possible, the criteria for determining that period;
 - (v) The rights you have in relation to the processing of your personal data;
 - (vi) If the personal data has not been collected from you, information about its source and the type of data concerned.
- **Right to rectification:** the data subject has the right to request, at any time, the rectification of their personal data (provided by them, e.g. name, address, civil identification numbers, tax identification numbers, contact details) and the right to have their incomplete personal data completed, including by means of an additional statement.
- **Right to erasure:** the data holder has the right to obtain the erasure of their data when one of the following reasons applies:
 - (i) the data holder's data is no longer necessary for the purpose for which it was collected or processed;
 - (ii) the data holder withdraws the consent on which the data processing is based and there is no other legal basis for such processing;
 - (iii) the holder objects to the processing under the right to object and there are no overriding legitimate interests that justify the processing;
 - (iv) if the holder's data is processed unlawfully;
 - (v) if the holder's data must be deleted in order to comply with a legal obligation to which RLR or a subcontractor is subject. Under the applicable legal terms, RLR is not obliged to erase the data subject's data to the extent that the processing is necessary for compliance with a legal obligation to which it is subject or for the purposes of the establishment, exercise or defence of legal claims.
- **Right to restriction of processing:** the data subject has the right to obtain restriction of processing of their data if one of the following situations applies:
 - (i) if they contest the accuracy of the personal data, for a period enabling its accuracy to be verified;
 - (ii) if the processing is unlawful and the data subject opposes the erasure of the data, requesting instead the restriction of its use;
 - (iii) if the data controller no longer needs the data for processing purposes, but the data is required by the data subject for the establishment, exercise or defence of legal claims.
- **Right to portability:** the data subject has the right to receive the personal data concerning him or her (and provided by him or her) in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller, if:
 - (i) the processing is based on consent or on a contract to which the data subject is party; and
 - (ii) the processing is carried out by automated means.

- **Right to restriction of processing:** the data subject has the right to obtain restriction of processing of their data if one of the following situations applies:
 - (i) if they contest the accuracy of the personal data, for a period enabling its accuracy to be verified;
 - (ii) if the processing is unlawful and the data subject opposes the erasure of the data, requesting instead the restriction of its use;
 - (iii) if the data controller no longer needs the data for processing purposes, but the data is required by the data subject for the establishment, exercise or defence of legal claims.
- **Right to portability:** the data subject has the right to receive the personal data concerning him or her (and provided by him or her) in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller, if:
 - (i) the processing is based on consent or on a contract to which the data subject is party; and
 - (ii) the processing is carried out by automated means.
- **Right to object:** the data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them based on the exercise of legitimate interests pursued or when the processing is carried out for purposes other than those for which the personal data were collected. In such cases, RLR will cease to process your personal data, unless it has legitimate reasons for doing so and these reasons override your interests. Exercising your right to object may result in the suspension or termination, in whole or in part, of the benefits associated with the purpose of the data processing in question.
- **Right to withdraw your consent:** In cases where data processing is based on your consent, you may withdraw your consent at any time. If you withdraw your consent, your personal data will no longer be processed, unless there is another basis, such as legal and regulatory obligations, that justifies such processing.

You also have the right to lodge a complaint with RLR and the supervisory authority - National Data Protection Commission (CNPd).

The following section describes how you can exercise your rights.

RLR has not appointed a Data Protection Officer (DPO) because ROYAL LIDO RESORT S.A. is not a public authority or body, does not regularly and systematically monitor data subjects on a large scale, and does not process sensitive personal data on a large scale.

Whenever a data subject, namely customers or others, wishes to exercise their rights or request information under the Data Protection Regulation, they may do so by emailing operations@rocamar.pt or in person at our headquarters: Hotel Royal Orchid - Travessa Vista da Praia, 9125-039 Santa Cruz, Madeira, Portugal.

Exercise of rights by the data subject

Requests for information and exercise of rights by the data subject shall be made in writing, providing proof of identity, by contacting RLR, which shall respond in writing (including by electronic means) to the data subject's request within a maximum of 30 days from receipt of the request, except in cases of particular complexity and/or a high number of requests, in which case this period may be extended to two months.

The exercise of your rights is free of charge, unless the request is unfounded or excessive, in which case a fee may be charged for the associated costs.

Submitting a complaint to the CNPD

The data subject may complain directly to the National Personal Data Control Authority, the National Data Protection Commission (CNPD), using the contact details provided by this entity for this purpose at www.cnpd.pt.

Data Violation (Security Incident Management and Data Privacy)

In the event of a personal data breach, and to the extent that such breach is likely to result in a high risk to the rights and freedoms of the holder, RLR will notify the national supervisory authority of such breach (CNPD) and will communicate the breach to the data holder within 72 hours of becoming aware of it.

Under the GDPR, communication to the data subject is not required in the following cases:

- If RLR has implemented appropriate technical and organisational protection measures, and those measures have been applied to the personal data affected by the personal data breach, in particular measures that render the personal data unintelligible to any person who is not authorised to access it, such as encryption;
- If RLR has taken subsequent measures to ensure that the high risk to the rights and freedoms of the holder is no longer likely to materialise;
- If communication to the holder(s) involves a disproportionate effort for RLR, it will make a communication through its public communication channels (e.g. website or social networks) or take a similar measure through which the holder(s) will be informed.

Any breach of personal data, the processing of which is the responsibility of RLR, should be reported via the email address indicated in '*Contact the data protection team*' in this privacy policy.

RLR will keep a record of the breach, the risk analysis, the measures implemented, and the need to communicate with the CNPD and the data owner.

Security measures

In accordance with the principles of proportionality and adequacy, security, implementation costs, the nature, scope, context and purposes of the processing, as well as the risks and their probability, RLR adopts appropriate technical and organisational security measures to ensure a level of personal data protection commensurate with the risk.

- The adoption of measures is an ongoing task for RLR, with a view to ensuring data privacy and security, based on the risks identified in the respective risk analyses.
- Some examples of these measures are listed below:
- Periodic training and/or awareness-raising activities on information security and data protection for employees.
- Implementation of a backup plan;
- Installation, maintenance and management of antivirus and firewall systems on RLR computers;
- Pseudonymisation of personal data;
- Encryption of information containing personal data for transmission.
- Control of access to RLR's physical equipment facilities;
- Automatic fire detection and extinguishing system;
- Among other Security Policy measures that are implemented or in the process of being implemented.

Changes to the Privacy Policy

RLR intends to keep data subjects informed about the processing of their data, so we plan to continuously update and improve our Privacy Policy.

RLR reserves the right to adjust or changes to this Privacy Policy, and these changes will be duly publicised on its website (<https://www.rocamarlidoresorts.com>), at its reception desks and/or through other channels it deems appropriate.