

DATA PROTECTION AND PRIVACY POLICY

AGÊNCIA AÇOREANA DE VIAGENS S.A., a company with headquarters at Rua de Lisboa, S/N, Edifício Varela, 2.º Andar, 9500, Ponta Delgada, registered before the Companies Registry of Ponta Delgada under the number 512005290 (hereinafter referred to as “Açoreana DMC”), in the execution of its activities, processes personal data, meaning any information relating to an identified or identifiable natural person (henceforth “**Data subject(s)**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In cases where Açoreana DMC determines the purposes and means of the processing of personal data within the performance of its activities it shall be considered as a controller, ensuring full compliance with Data Protection Legislation, as described below.

In this sense, for the website [<http://bportugal.acoreanadmc.com/>] created for this event (hereinafter “**Event’s Website**”), Açoreana DMC shall be qualified as a controller of the personal data that will be processed herein, as further explained above.

According with the aforementioned Legislation, Açoreana DMC stands for the processing of personal data pursuant to all applicable principles: Principle of Lawfulness, Principle of Fairness and Transparency; Principle of Purpose Limitation; Principle of Data Minimisation; Principle of Accuracy; Principle of Storage Limitation; Principle of Integrity and Confidentiality.

In full accordance with the principles outlined above, Açoreana DMC fully respects the data protection rights of Data Subjects. Hence, Data Subjects may contact Açoreana DMC to obtain any information related to the processing of personal data, using the contacts provided in section 7.

For the foregoing, this Data Protection and Privacy Policy is established in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and other relevant legislation (hereinafter “**Data Protection Legislation**”). Hence, Açoreana DMC undertakes that any and all data processing operations will be according with the following sections:

1. Purposes, Legal Basis and Retention Periods for the Processing of Personal Data

The personal data of Data Subjects that will be processed by Açoreana DMC in the Event's Website will have the following purposes, legal basis's and retention periods:

Purposes	Legal Basis	Retention Period
Provision of Travel Services: a) Transport of passengers; b) Accommodation which is not an integral part of the transport of passengers services and has no residential purpose; c) Rental of cars or other motor vehicles; d) Related travel services.	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.	Until the expiry of the legal statutory limitation period for all obligations arising from the contract in the provision of the travel services and the related travel services.
Provision of Organized Trips	Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.	Until the expiration of the legal statutory limitation period for all obligations arising from the contract in the provision of the organized trips.
Name, address, taxpayer number	invoicing	Until the expiration of the legal statutory limitation period for all obligations arising from the contract in the provision of the organized trips.

Observations	Unambiguous Consent	Until the expiration of the legal statutory limitation period for all obligations arising from the contract in the provision of the abovementioned services, as the personal data for this purpose is directly related.
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2. Personal Data

In order to pursue the identified purposes and as described in the Event's Website, Açoreana DMC will process the following data: name; e-mail address; contact number; age; general observations; travel information; organized trips; payment and invoice related data.

3. Processing Methods

The processing of personal data will be executed automated and manually by computer tools, which are strictly related to the mentioned purposes and, in any case, guaranteeing the security and confidentiality of personal data.

4. Disclosure and Transmission of Personal Data

Regarding the disclosure and transmission of personal data, Açoreana DMC's employees will process personal data and, as a result, they can access to the personal data of Data Subjects. The referred employees will solely process personal data of Data Subjects for the purposes specified in this Policy and in strict compliance with current or future Data Protection Legislation.

Third parties for whom the disclosure of data is absolutely related to the performance of the services provided by the Açoreana DMC as requested by the Data Subject(s).

Third parties who may process personal data on behalf of Açoreana DMC, qualified as processors, may also access to personal data of Data Subjects as subcontractors, including without limitation the providers of IT services required for the operation of information systems, outsourcing service providers or cloud computing services, professionals and consultants.

Data Subjects have the right to obtain a complete and up-to-date list of the subcontractors (if any) elected by Açoreana DMC and for this purpose they shall submit a specific request to Açoreana DMC under the terms specified in section 7 of this Policy.

5. Data Subjects Rights

Under current or future Data Protection Legislation, Açoreana DMC informs that Data Subjects have the right of access, rectification, limitation, portability, erasure and the right to object to the processing of personal data in certain circumstances, which may be exercised under the terms of this chapter of the Data Protection and Privacy Policy.

Rights	What do they consist in?
Right to information	<p>You have the right to obtain clear, transparent and easily understandable information about how Açoreana DMC uses your Personal Data and what are your rights. That is why Açoreana DMC makes all this information available to you in this Data Protection and Privacy Policy.</p>
Right of access	<p>You have the right to obtain information on what Personal Data Açoreana DMC processes (if we are processing them) and certain information (similar to that provided in this Privacy Policy) on how this Data is processed. This right allows you to know and confirm that we use your Data in accordance with data protection laws.</p> <p>Açoreana DMC may refuse to provide the requested information whenever, in order to do so, Açoreana DMC has to disclose Personal Data of another person or the information negatively impacts the rights of another person.</p>
Right to rectification	<p>If your Data is incorrect or incomplete (for example, if your name or address is wrong), you may ask Açoreana DMC to take reasonable measures to correct it.</p>
Right to erasure	<p>This right is also known as the "right to be forgotten" and, in a simple way, allows you to request to permanently erase your data, as long as there are no valid grounds for Açoreana DMC to continue using them or their use is illicit. This is not a general right to erasure, since exceptions are allowed (for example, where such data are necessary for the defence of a right in a judicial proceeding).</p>
Right to restriction of the processing activities	<p>① You have the right to "block" or prevent future use of your Data while Açoreana DMC evaluates a request for rectification or as an alternative to deletion. Whenever the processing is limited, Açoreana DMC continues to be able to store its data, but cannot use it later. Açoreana DMC maintains a list of the holders who</p>

	have requested the "blocking" of the future use of their data to ensure that this limitation is respected.
Right to data portability	① You have the right to obtain and reuse certain Personal Data for your own purposes in various organizations. This right applies only to the data that you have provided to Açoreana DMC and that Açoreana DMC deals with your consent and those that are handled by automated means.
Right to object	① You have the right to object to certain types of processing, for reasons related to your particular situation, at any time during which this processing is carried out, for the legitimate interest of Açoreana DMC or of Third Parties. Açoreana DMC may continue to process such Data if it can prove "legitimate reasons for the processing that overlap its interests, rights and freedoms" or if such Data is necessary for the establishment, exercise or defense of a right in a judicial process.
Right to lodge a complaint	① You have the right to complain to the competent control authority, the Comissão Nacional de Proteção de Dados (CNPD), if you believe that the processing carried out on Personal Data violates your rights and / or applicable data protection laws

You may at any time, in writing, exercise the rights enshrined in the Data Protection Legislation and other applicable legislation through the methods described in section 7 of this Policy.

6. Confidentiality and Security

To ensure the security and confidentiality of the collected personal data collected, Açoreana DMC uses protected databases including, but not limited to, adequate firewalls and passwords, in accordance with current and future Data Protection Legislation and other applicable legislation. Access to personal data is only possible for authorized employees who have an effective need to use the data, in accordance with the principles of security and confidentiality. Violations of the present Data Protection and Privacy Policy by Açoreana DMC employees may result in disciplinary action. Compliance with standards and procedures by Açoreana DMC's staff is monitored and verified periodically.

7. How to Contact Açoreana DMC for Data Protection and Privacy Matters

For any questions regarding data protection or to exercise your aforementioned rights, you may contact the data protection head responsible for the protection of personal data of Açoreana DMC by sending an e-mail to protecaodedados@bensaude.pt.

Moreover, the Data Subject can contact the Data Protection Officer of Açoreana DMC by sending an e-mail to dpo@bensaude.pt.