PRIVACY POLICY

Portugal Greatest Tours (hereinafter also referred to as "we", "us" and "our") is a registered trademark owned by Pleasure2invite – Unipessoal Lda. a licensed company (RNAAT nr. 1690/2019) that operates in the tourism business. As part of our activity, we need to collect some personal data from the customers/users (hereinafter also referred to as "you" and "your") of our website at <u>www.portugalgreatesttours.com</u> (hereinafter referred to as "website" or "site") or when you otherwise interact with us.

Portugal Greatest Tours takes the protection of your personal data very seriously and is committed to protecting the personal information you provide us.

We know and comply with the rules provided for the processing of personal data, provided for in the General Data Protection Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 April 2016, (hereinafter referred to as "GDPR") adopted by the Portuguese State and applied to national territory under the terms of Law 58/2019, published in the DR 151/2019, of 08/08/2019.

+ Collection of Data

We collect and store information you provide directly to us by phone, email or when you enter in our website, for example, to create an account, fill out a form, register or book for a tour, ask for a quote, communicate with us via third-party social media websites, request customer support or otherwise communicate with us.

All requested information about personal data is limited to the strictly necessary for the purpose of exclusively organizing the requested tours or services. We collect two types of information. Personal information, such as your name, address, email address, phone number, and other information that does not identify you personally, such as country of residence, age group category (adult, child or senior), and any other information you choose to provide. However, failure to respond to data requests considered mandatory, will mean that it is impossible to access the tour/service for which the data was requested.

If you do not agree to the conditions of this Privacy Policy, Portugal Greatest Tours will be unable to accept your reservation.

If a customer books a tour or service in our website, the customer can make the payment using a Bank Transfer, or PayPal. In this case either your bank or PayPal are the only entities that process your personal data for payment purposes. We will not collect payment information from you and all information collected by PayPal or the bank for purposes of processing your payment is not available to us.

The customer guarantees that the information provided is true, accurate, complete, and up to date and assumes responsibility for any damage or loss, direct or indirect, that may be caused because of breach of this obligation. If the data provided belongs to a third party, the customer guarantees that he/she has informed the third party of the aspects contained in this document and has obtained authorization to provide their data to Portugal Greatest Tours for the indicated purposes.

When you visit our website, it automatically collects the necessary data to enable you to use it (usage data). This data is used to provide and design the service according to users' preference. This data is always deleted as soon as it is no longer required and if there are no storage obligations.

+ Responsibility for the Personal Data Collection and Processing

Portugal Greatest Tours is responsible for the collection and processing of your personal data, by automated systems or other means.

Portugal Greatest Tours may disclose customer information to some suppliers solely for the purpose of completing the requested booking (for example, hotels, trains, rental cars, etc.). Any data collected in this way on the web page will be transmitted in accordance with the legislation on data protection in force to the entities involved, with the view to contract the required services to the extent absolutely necessary for the realization of the booking tour/service required. On the other hand, Portugal Greatest Tours also has service providers that may have full or partial access to your personal data, namely accounting, billing, legal or technology management services, under the terms permitted by the Portuguese law. These entities are obliged under the terms of the established contracts, to keep confidentiality and to guarantee the security of your data and cannot use it for any purpose other than the management of the services provided to Portugal Greatest Tours.

Portugal Greatest Tours maintains a database with the registration of its customers. The information contained in this database is solely the data provided by customers during the booking process, in the terms approved by the GDPR.

For questions related to the collecting and processing of your personal data, you can contact Portugal Greatest Tours through email: <u>discover@portugalgreatesttours.com</u>.

+ Your Consent

When making your personal data available to Portugal Greatest Tours, whether electronically, verbally or in writing, the customer, potential customer or mere user of the website https://www.portugalgreatesttours.com, expressly acknowledges and consents that his/her data be processed, transferred or stored in accordance with this Privacy Policy and with the rules and principles contained in the GDPR and in the Service Terms & Conditions of the tours/services used or to be provided.

If you do not agree with the Privacy Policy, you should discontinue your use of the website, and cease providing personal information to us. If you continue using the website or provide personal information, including also after any Privacy Policy modification takes effect, you will be legally bound by the Privacy Policy and all its modifications.

Our Privacy Policy does not extend to the social networks where Portugal Greatest Tours presents itself institutionally. All our interaction in these spaces and which may involve personal data, is the sole responsibility of the management of the respective social networks and in accordance with its own Privacy Policy.

As our customer, you are aware of the rules contained in this Privacy Policy, as well as ensuring that the other members of your group are aware of the same content and that they agree to provide their personal data, whenever necessary, in order to proceed with the booking or another purchase on their behalf.

+ Use of Information

Your personal data collected by Portugal Greatest Tours is requested for the business-related purposes ONLY, including third-party services contracted for the tour, and can be collected in person during tours, or through our website, namely in filling out contact forms, or by communicating via email, SMS or telephone.

Your data will NOT be transmitted to third parties, except the necessary data to contract relevant services for the tour or used for legal national and international obligations.

The communication of your personal data is in some cases absolutely necessary for the purposes for which the data were requested, under penalty of not being able to proceed with the requested tour/service or the establishment of contractual relations to which the parties propose.

We may use information about you for various purposes:

- 1. Manage contract and billing processes related to your booking or quote request.
- 2. Provide and deliver the products and services you request or register for, process transactions, and send you related information, including email confirmation, booking orders, and invoices.
- 3. Send you technical notices, updates, security alerts, support, and administrative messages regarding the tours/services you booked or requested information on.
- 4. Respond to your comments, questions, requests and provide customer service.
- 5. Provide important and necessary information to suppliers chosen for the tour/service requested or booked by the customer.
- 6. Communicate with you about products, services, offers, promotions, events offered by Portugal Greatest Tours and other matters, including but not limited to, provide news and information we think will be of interest to the customer if duly accepted by the customer or the user.
- 7. Send Email, SMS and WhatsApp messages with intentions exclusively related to the booking and tour logistics.
- 8. Monitorisation, update and development of statistical systems and analyses regarding the usage and activities in connection with our tours/services.
- 9. Submit survey forms to which the user is not obliged to respond.
- 10. Carry out any other purpose described to you at the time the information is collected.

In case we may decide to make a commercial or promotional communication, it will be directed exclusively to users who have previously authorized it expressly.

In case the user wishes to stop receiving commercial or promotional communications from Portugal Greatest Tours, the user may request the termination of the service by sending an e-mail to <u>discover@portugalgreatesttours.com</u>.

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested/booked.

+ Restrictions on Use

You agree that you will not, and will not assist or enable others to:

- a. use the website to threaten, stalk, defraud, incite, harass, or advocate the harassment of another person, or otherwise interfere with another user's use of the website.
- b. use the website to submit or transmit spam, chain letters, contests, junk email, pyramid schemes, surveys, or other mass messaging, whether commercial in nature or not.
- c. use the website in a manner that may create a conflict of interest, such as trading reviews with other business owners or writing or soliciting reviews.
- d. use the website to promote bigotry or discrimination against protected classes.
- e. use the website to violate any third-party right, including any breach of confidence, copyright, trademark, patent, trade secret, moral right, privacy right, right of publicity or any other intellectual property or proprietary right.
- f. use the website to solicit personal information from minors or to harm or threaten to cause harm to minors.
- g. use any robot, spider, website search/retrieval application, or other automated device, process or means to access, retrieve, scrape or index the website or any website content.
- h. use the website to submit or transmit pornography or illegal content.
- i. attempt to gain unauthorized access to the website, user accounts, computer systems or networks connected to the website through hacking, password mining or any other means; use the website or any website content to transmit any computer viruses, worms, defects, Trojan horses or other items of a destructive nature (collectively, "Viruses"); use any device, software or routine that interferes with the proper working of the website, or otherwise attempt to interfere with the proper working of the website; make excessive traffic demands; use the website to violate the security of any computer network, crack passwords or security

encryption codes; disrupt or interfere with the security of, or otherwise cause harm to, the website or website Content; remove, circumvent, disable, damage or otherwise interfere with any security-related features of the website, features that prevent or restrict the use or copying of website Content, or features that enforce limitations on the use of the website.

+ Data storage

Your personal data will be stored for as long as necessary, and for the purposes stated in this privacy policy or for as long as we are required by law or legally obligated to store this information. Some personal data obtained by registering in our website or given by customers who have established a business relationship with Portugal Greatest Tours will need to be processed and stored in secure and certified systems, because of a combination of our own protected systems and supplier's reliable systems.

The personal data that we store are treated with the legally required degree of protection to guarantee its security and prevent its alteration, loss, treatment, or unauthorized access.

+ Right of Access, Rectification, Deletion, Treatment Limitation, Treatment Opposition, Request the Portability of your Data,

You are entitled, whenever you want and free of charge, to request Portugal Greatest Tours to:

- Access the data you provided
- Request rectification of your data
- Request the deletion of your data
- Request to limit the processing of your data
- Oppose the treatment of your data
- Request the portability of your data to the entity expressly indicated

If you want to exercise any of the above rights you can email us at <u>discover@portugalgreatesttours.com</u>, or you can do it by logging into your online account in case you have one. We may require proof of identity and sufficient information about your interactions with us, to find your information. If someone makes the request on your behalf, that person will have to provide written and signed confirmation that you have given authorisation. We reserve the right of not providing you with a copy if it includes personal information of other people or if we have a legitimate reason to retain it.

Note, however, that if there is a legally imposed rule or obligation that overrides these rights, Portugal Greatest Tours will inform you to the impossibility of executing your request, indicating the respective grounds.

+ Right to Complain

If you believe that your legal rights have been violated or when you have reasons to believe that your personal information is being used in a way that does not comply with the Portuguese law, clarification, please contact us for by sending us an email to discover@portugalgreatesttours.com. We will carefully analyse your complaint and we will answer you as quickly as possible. If we do not answer to your complaint, you can file it with the National Data Protection Commission (CNPD) (https://www.cnpd.pt).

+ Cookies

Portugal Greatest Tours also informs its website users that we use Cookies to facilitate and provide a better browsing experience through the website. Our Cookies Policy is part of the Privacy Policy of our website. By accessing the website, you expressly consent to the use of this type of Cookies on your devices.

If you disable Cookies, your website navigation may not be optimized, and some of the utilities available on the website may not work correctly.

You have the right to accept or stop cookies from being stored on your device at any time by modifying the settings in your web browser to reflect your cookies preferences. Please be aware

that you may not be able to use all the interactive features of the website <u>www.portugalgreatesttours.com</u> and content once cookies are disabled.

+ Data Security

Portugal Greatest Tours declares that has taken and will continue to implement the necessary technical and organisational security measures to guarantee the security of the personal data provided by you against alteration, loss, destruction, manipulation, and unauthorized access, considering the current state of the technology, the nature of the data stored and the risks to which it is exposed. Our managers and guides involved in data processing are obliged to comply with the data protection laws and to treat personal data confidentially.

The personal data obtained by registering on the websites are incorporated into a computer application owned by third-party service providers that are compliant with GDPR.

+ Links from Our Website to Other Websites

Some pages (such as social media for example) on our website may contain links to other relevant websites, which are related to the subject matter. If you choose to follow an external link to any other website outside the <u>www.portugalgreatesttours.com</u>, you should understand that these companies have their own Privacy Policy, which may not be the same as ours. For this reason, Portugal Greatest Tours is not liable and does not accept any responsibility for their policies or for third-party websites. We advise you to verify and accept their policies before sending them any personal data.

+ Changes to the Privacy Policy

Portugal Greatest Tours reserves the right to amend this Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy on our website with a revised date at the bottom of this Privacy Policy. Therefore, it is strongly recommended to check the Privacy Policy whenever you access our services otherwise interact with us, referring to the date of the last modification listed at the bottom.

+ Disclaimers & Limitations of Liability

In no event will Portugal Greatest Tours and its owners, managers, guides and drivers be liable for damages relating to the customer, potential customer, or mere user access to (or inability to access) the website, or to any errors or omissions, or the results obtained from the use of the website, whatever the legal basis of such liability would be, except liability for damages caused wilfully, and ONLY to the extent permitted by applicable Portuguese law.

The customer, potential customer or mere user accepts that Portugal Greatest Tours or its owners, managers, guides and drivers, are not liable for any of the following losses or damage (whether such losses where foreseen, foreseeable, known or otherwise): (a) loss of data; (b) loss of revenue or anticipated profits; (c) loss of business; (d) loss of opportunity; (e) loss of goodwill or injury to reputation; (f) losses suffered by third parties; or (g) any indirect, consequential, special or exemplary damages arising from the use of <u>www.portugalgreatesttours.com</u> regardless of the form of action.

At Portugal Greatest Tours we check and recheck the details about all the products and services we offer for accuracy. However, Portugal Greatest Tours does not warrant that functionality, content or information contained on the website will be uninterrupted or error free, that defects will be corrected, or that the website or the servers that make it available are free of viruses or bugs.

If any of these terms are determined to be illegal, invalid, or otherwise unenforceable, then that provision will be deemed superseded by a valid, enforceable provision that most closely matches the intent of the original provision, and the remaining provisions of this Privacy Policy will continue in full force and effect and continue to be binding and enforceable.

+ Contact Us

If you have any questions about this Privacy Policy, please contact us at <u>discover@portugalgreatesttours.com</u>.

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