

PRIVACY POLICY

MA TRAVEL LTD-BRANCH IN PORTUGAL with registered office at Avenida do Forte, 4 – Parque Sweden, Edf. Sweden V, Piso 0 – 2794-038 Carnaxide, holder of the corporate identification number 980 564 808 and the respective Group Companies are committed to protecting the privacy of your personal data (hereinafter “data”) and, therefore, undertakes to process and guarantee the security of such data in accordance with the legislation on the protection of personal data in force, and in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 , General Data Protection Regulation – “GDPR”. This Privacy Policy intends to make known how MA TRAVEL LTD – BRANCH IN PORTUGAL treats your data and your rights as a data subject.

Any data that you make available to MA TRAVEL LTD-SUCURSAL IN PORTUGAL will be understood as obtained, processed and transmitted in strict observation and in full compliance with the requirements established in the RGPD and legislation in force.

Data Controller and Data Protection Officer:

In accordance with the provisions of the RGPD, MA TRAVEL LTD-SUCURSAL EM PORTUGAL acts as the entity Responsible for the Processing of your data. For any clarification related to this Privacy Policy or the processing of your data, you may contact MA TRAVEL LTD-SUCURSAL EM PORTUGAL by writing or emailing to:

Business Address: MA TRAVEL LTD, Quinta da Fonte, Rua Quinta da Fonte, 13 – Edf. Q34-Forum – 2770-192 Paço de Arcos

E-mail: mario.almeida@matravel-dmc.com

Type of personal data, Purposes and Grounds for Processing: This policy covers the online and offline data collection activities of MA TRAVEL LTD – BRANCH IN PORTUGAL, including data that it collects through various channels, such as brand websites, agencies and events/fairs in which MA TRAVEL LTD – BRANCH IN PORTUGAL participate.

MA TRAVEL LTD – BRANCH IN PORTUGAL collects and processes your data for a number of purposes:

- **RESERVATION OR PURCHASE OF STAYS IN OUR LOCAL ACCOMMODATION (ALOJAMENTO LOCAL):** There is a set of data that is required to be collected, in order to process a reservation or purchase of stay with MA TRAVEL LTD, namely to send a booking confirmation and manage any other elements related to the reservation or purchase of stay. The required data is as follows: Identification Document details, address, contact number, email, details about customer preferences and requirements, relevant interests, special occasions and special requests, and when applicable credit card details (for payment purposes only), although other data points may be requested, if necessary, for delivering a specific product or service. The basis for collecting this data is the management of the contractual relationship and the legitimate interest of MA TRAVEL LTD – BRANCH IN PORTUGAL.
- **SATISFACTION SURVEYS:** In order to assess customer satisfaction with the services provided, MA TRAVEL LTD – BRANCH IN PORTUGAL may send the customer a quality survey. Customers are not obliged to respond to surveys, which aim is to collect opinions about the stay provided, with the aim of improving/developing them. The basis for processing this data is the legitimate interest

of MA TRAVEL LTD – BRANCH IN PORTUGAL in continuously improving the quality of its services.

- **MANAGEMENT & ADMINISTRATION:** The data collected is so that MA TRAVEL LTD – BRANCH IN PORTUGAL can fulfill its accounting/tax and legal and administrative obligations, which typically require your name, address and Tax Identification Number. The basis for processing this data is compliance with a legal obligation and the legitimate interest of MA TRAVEL LTD – BRANCH IN PORTUGAL in managing the relationship with the customer.
- **COMMERCIAL & PROMOTIONAL COMMUNICATIONS:** MA TRAVEL LTD – BRANCH IN PORTUGAL collects data such as name, telephone or mobile number and e-mail address, in order to be able to provide you with information about services that may be of interest to you (for example, communications marketing or campaigns and promotions), collecting your consent when necessary. At any time, you may object to the processing of your data for these purposes, as stipulated in the paragraph below “Exercise of your Rights”. The basis for processing this data is the legitimate interest of MA TRAVEL LTD – BRANCH IN PORTUGAL or, when requested, your consent.

Pursuant to the duty of information to which MATRAVEL LTD – BRANCH IN PORTUGAL is bound, below are the categories of subcontractors to which the personal data of website users and MATRAVEL LTD – BRANCH IN PORTUGAL customers is/may be communicated to:

Subcontracted Entities:

Licensing, maintenance, support and technical assistance companies for software and systems

Payment service processing companies, EDI and electronic invoicing services, accounting, tax and administrative management and activity support software

Commercial Promoters

Direct Marketing support companies/digital marketing partners

Customer satisfaction rating companies

Security surveillance companies and preventative and corrective maintenance for security systems

Customer management platforms

Customer service entities

Purposes for processing Personal Data:

Management / maintenance / support to systems and softwares that support the activity conducted by MA TRAVEL LTD – Sucursal Portugal

Economic and accounting management, of customers, service and supplier providers billing

Promotion / sale of MA TRAVEL LTD services in Portugal

Assistance in marketing email management, performance analysis and user profiles, impact and communication of advertising results.

Customer surveys to determine customer satisfaction

Video surveillance for the safety of customers and property

Provision of services related to customer stays at MA TRAVEL LTD – Sucursal em Portugal managed entities

Customer care and contact services

TRANSFER OF PERSONAL DATA:

Within the scope of your reservation and/or purchase, MA TRAVEL LTD – BRANCH IN PORTUGAL may transfer your data:

SEDE UK
MA TRAVEL LTD
Suite 16, Exhibition House
Addison Bridge Place
London, W14 8XP
INGLATERRA

FILIAL PT
MA TRAVEL LTD – SUCURSAL PORTUGAL
Quinta da Fonte, Edf. Q34 - Forum
Rua Quinta da Fonte, 13-1º
2770-192 Paço de Arcos
PORTUGAL

1. To government authorities (eg immigration, border control, public safety and security entities and the fight against terrorism).
2. Within the scope of merger, acquisition and/or incorporation processes in which it is found, when such transfer is necessary within the legitimate interests of MA TRAVEL LTD – BRANCH IN PORTUGAL or third parties to whom the data is communicated. The processing of your personal data may also be carried out by service providers, who act on behalf of MA TRAVEL LTD – BRANCH IN PORTUGAL, namely marketing agencies and digital and social media, accounting management services, auditors and lawyers, external entities that provide us with technological services, such as providers of computer platforms, hosting services, maintenance and assistance of our databases.

MINOR'S DATA:

Data of minors is collected and processed with the consent of parents or a legal guardian. Regarding this data, the parents or legal guardian can exercise the rights that the GDPR grants to data subjects.

PERIOD OF RETENTION OF PERSONAL DATA:

Customer's personal data is kept by MA TRAVEL LTD – BRANCH IN PORTUGAL for the period strictly necessary to meet the purposes, except when there are conservation obligations imposed by the applicable legislation, or legitimate interest, which impose the maintenance of your personal data for a longer period.

Personal data collected for the purpose of sending communications about campaigns and promotions will be kept for a period of 2 years.

PERSONAL DATA SECURITY MEASURES:

MA TRAVEL LTD – BRANCH IN PORTUGAL uses adequate security measures to protect your data, including adequate technical and organizational measures to protect them against abusive or illegal treatment and against their accidental loss, damage or destruction.

Data are processed by employees of MA TRAVEL LTD – BRANCH IN PORTUGAL or by authorized service providers, accessing only strictly necessary data, depending on the specific purposes for which the data was collected.

EXERCISE YOUR RIGHTS:

As a data subject, you may exercise the following rights, within the legally established limits:

i. Access to personal data [By submitting an access request, you will be provided with access and details of the personal data processed by MA TRAVEL LTD – BRANCH IN PORTUGAL.]

ii. Rectification of personal data [If your personal data is incomplete or incorrect, you can request data to be corrected.]

iii. Right to be forgotten [By exercising your right to be forgotten, MA TRAVEL LTD – BRANCH IN PORTUGAL will, if applicable, delete your personal data.]

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iv. Portability of personal data [By requesting the portability of your personal data, you will receive, in a machine-readable format, the personal data that you have provided and that are processed based on your consent or in the performance of a contract.]

v. Opposition to the processing of personal data [For reasons related to your situation, you have the right to object to the processing of your personal data by MA TRAVEL LTD – BRANCH IN PORTUGAL based on legitimate interest or in relation to direct marketing.]

vi. Revocation of consent for processing [If you revoke your consent, MA TRAVEL LTD – BRANCH IN PORTUGAL will withdraw your consent for the activity you specify].

The exercise of these rights depends on a written request (including a copy of a document proving the identity of the client and mention of the right or rights he wishes to exercise), to be sent by one of the following ways:

Postal Address: MA TRAVEL LTD – BRANCH IN PORTUGAL - Quinta da Fonte, Rua Quinta da Fonte, 13 – Edf. Q34-Forum – 2770-192 Paço de Arcos

E-mail: mario.almeida@matravel-dmc.com

In person: at our office, by completing the appropriate form

After sending the request with the necessary information, MA TRAVEL LTD – BRANCH IN PORTUGAL will respond within a period of one to two months, taking into account the complexity and number of requests.

CONTROL AUTHORITY:

Comissão Nacional de Defesa de Dados – CNPD at www.cnpd.pt.

INFORMATION ABOUT USE OF COOKIES:

When accessing our website it is necessary to accept or not the Cookies Policy. These Cookies will only be installed with your express consent, except in cases where consent is necessary for the functioning of the Site

CHANGES TO PRIVACY POLICY:

MA TRAVEL LTD – BRANCH IN PORTUGAL reserves the right, at any time, to modify or update this Privacy Policy, these changes being duly updated on our platforms and websites. Please check back regularly for any updates or changes to this