

REGULATION FOR PERSONAL DATA PROTECTION

Legislation

The EU General Data Protection Regulation (GDPR) will come into effect on 25th of May 2018. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, establishes the rules for protection of natural persons with regard to processing and free movement of personal data and it is applied directly to all entities that process personal data of individuals, in any Member State of European Union, namely Portugal. Complete information concerning the regulation can be accessed [here](#).

Privacy policy

Grupo Miramar acknowledges the importance of protecting your personal data, whichever its nature. Therefore we have developed a number of security measures allowing us to protect the data of all our clients and also of those who visit our website. In this section we explain who we are, what purposes your personal data is used for, how is it handled, with whom is it shared, for how long will it be stored, and also the ways to get in touch with us and to exercise your rights. The users should read carefully this privacy statement that has been composed in a simple and clear manner to help its comprehension, and decide freely and voluntarily whether they want to provide their personal data to Grupo Miramar. Thereby, the users guarantee that they are of legal age of majority (over eighteen (18) years old), that the provided personal data is accurate, exact, complete and up to date and that they are responsible for any damage or injury, direct or indirect, which could be caused by default of this obligation. The users are required to inform Grupo Miramar, or append the information digitally, of any changes in the data provided. If the provided data belongs to a third part, the users have to guarantee that they have informed the third part about the requirements mentioned in this document and that they have obtained an authorization from the third part to provide their data to Grupo Miramar, for the purposes listed in this document. In case of any questions about the way we process and protect your personal data, please send us an email to dpo@grupomiramar.pt.

Context

The present privacy policy applies to all personal data collected, through the following websites: <http://www.miramarnazarehotels.com>, <http://www.thalassonazare.com>, <http://www.nazareonline.com>, <http://www.sublutour.comor>, through offline forms and inscriptions for our services or through accordingly marked advertising for the purpose.

Responsibility

Serafim Silva Actividades Hoteleiras SA, a collective person with a vat number 502856564, with its head office at Rua Abel da Silva nº 36, 2450-060 Nazaré, as the mentioned Grupo Miramar, will process your data. This organization is responsible for processing your personal data in accordance with the General Data Protection Regulation (GDPR).

You may contact Grupo Miramar for any questions related to the present privacy policy, through the following contact information:

- E-mail: dpo@grupomiramar.pt
- Postal address:
Grupo Miramar – Customer Service
Rua Abel da Silva nº36
2450-060 Nazaré
PORTUGAL
- Telephone: +351-262 550 000

Processing purposes and legal bases

The personal data of the website users is:

- Collected through user/client registration for the newsletter:
name, country, phone number, e-mail;
- Obtained through browsing in the website, IP, type of device;

- Obtained through login to Facebook or other social networks: social profile (social networks).

Why do we need your information? Grupo Miramar processes personal data, both manually and through automated systems, for the following purposes:

- Client management

The data collected on this website is necessary for conclusion and execution of the contract of purchases and sales. It is designated for processing and providing information about the state of the orders submitted, as well as for communicating with the clients, processing requests for information and for possible complaints. Providing the requested information during the act of user registration is mandatory and it is not possible to proceed with the purposes mentioned above without it.

- Marketing

If the client agrees, Grupo Miramar could use the data provided by client at the registration or when making changes to the registration, for sending information about products, new features, campaigns, offers and birthday messages, through whichever channel of communication, specifically through e-mails, SMSs, or other forms of automatic messages. The agreement on utilization of personal data for the purposes of marketing can be altered at any time, through the following procedures:

- At the configurations of customer account;
- Pressing the unsubscribe button at the end of any e-mail received from Grupo Miramar;
- Contacting the customer support through the following e-mail address: dpo@grupomiramar.pt;
- At the profile settings.

Grupo Miramar configures the profile settings based on the information related to your purchases and searches. This information will be analyzed in order to identify your consumer's profile. The client's own consent is the legal foundation for collecting and processing their personal data, for the referred purposes.

Retention period

We store your data only for the period of time necessary for the purposes that it has been collected for. For the purposes described in the present privacy policy, your personal data will be stored until you withdraw your consent.

Consent

When giving your consent to this privacy policy, you agree with the processing of your personal data, especially for the mentioned and selected purposes. If the consent is legally necessary for processing some particular personal information, the owner of the data has the right to withdraw his or her consent at any time, although this right does not overcome the legality of processing data based on a previously given consent or later processing of the same data, based on another legal foundation, in case of a formal agreement or a legal obligation for which Grupo Miramar is subject to. To withdraw your consent, please contact us through letter, telephone or e-mail dpo@grupomiramar.pt.

Data dissemination

Grupo Miramar could share users' personal data:

- Inside Grupo Miramar, to companies that are holders of the following brands:
 - Miramar Hotels
 - Thalasso Nazaré
 - Sublu Tour
 - Miramar Ocean

- NazareOnline

For more information about the companies mentioned above, please contact the data management services at dpo@grupomiramar.pt.

- To the third parts providing services to Grupo Miramar, such as companies who deal with the purchasing process and billing management, transportation, storage, marketing, hosting of websites and bank agencies.

Only the data needed for the particular services concerned is provided to these companies and they commit to processing the referred personal data only and exclusively for the purposes mentioned above.

Subcontractors

A competent service provider, hired by Grupo Miramar, can conduct the processing of users' data. The mentioned service provider will process users' data exclusively for the purposes defined by Grupo Miramar, compliant with the given indications, fulfilling rigorously the legal regulation for protecting personal data, security of information and other related norms.

International data transfers

Grupo Miramar predicts to process users' data in the territory of European Economic Area (EEA) and therefore does not predict any international transfers of data.

User rights

All users can, at any time and without costs, during the possession or processing of their data by Grupo Miramar, exercise the following rights:

- Right to access information – the right to solicit a copy of the information we possess about you;
- Right for rectification – the right to rectify the information considered imprecise or incomplete;
- Right to be forgotten – the data we possess about the client in our records can be eliminated totally upon request, on certain circumstances;
- Right for restriction of processing – processing personal data can be restricted when certain conditions apply;
- Right for transferability – the right of having your data transferred to other organization;
- Right to oppose – the right to oppose certain types of processing, such as direct marketing;
- Right to oppose automatic processing, including automatic profiling;
- Right for a judicial redress: if Grupo Miramar refuses your request for agreement regarding the right for access, we will explain our motive. As a user you have the right to lodge claims as described below.

The rights mentioned above can be exercised by e-mail: dpo@grupomiramar.pt or through a registered letter to the postal address:

Grupo Miramar – Apoio ao Cliente
Rua Abel da Silva nº36
2450-060 Nazaré
PORTUGAL

Complaints

If the user wishes to lodge a complaint about the way his or her personal data has been processed by Grupo Miramar, or about the way his or her complaint has

been handled, he or she can address the complaint directly to Grupo Miramar's supervising authority.

Contacts:

Grupo Miramar – Client Support
Rua Abel da Silva nº36
2450-060 Nazaré
PORTUGAL

Contacts of the supervising authority:

Comissão Nacional de Proteção de Dados – CNPD
Rua de São Bento, nº148, 3º
1200-821 Lisboa
Tel: 351 213928400
Fax: +351 213976832
e-mail: geral@cnpd.pt.

The mandatory nature of the data requested

Providing of required client/user data at online or offline registration for the established purposes is mandatory.

If the user does not provide this data, Grupo Miramar cannot attend to clients' requests.

Automated decisions

For enabling automated decisions, Grupo Miramar may create user profiles based on personal characteristics, preferences, browsing history and localization. In these cases, the user has the right for human intervention with

regard to the decision, the right to express his or her opinion and to appeal against the decision adopted by Grupo Miramar.

Personal data protection measures

Grupo Miramar implements various technical and organizational measures for protecting users' personal data, including secure servers, firewall, data encryption for applications and communications.

The use of cookies

The measures concerning the use of cookies by Grupo Miramar can be accessed [here](#).

Modifications in the Privacy Policy

Grupo Miramar will update its privacy policy occasionally. To keep updated, we invite you to review this document periodically.