

# PRIVACY POLICY



**MONTADO**

HOTEL & GOLF RESORT



# PRIVACY POLICY

Thank you for your interest in participating in the Montado Hotel and Golf Resort Satisfaction Survey. The protection of your personal data is important to DHM DISCOVERY HOTEL MANAGEMENT (hereinafter referred to as "DHM") as the management company of the Montado Hotel & Golf Resort. The processing of data in this survey is carried out in accordance with DHM's Data Privacy Policy, available at [https://discoveryportugal.com/wp-content/uploads/2018/05/DHM\\_Pol%C3%ADtica\\_Privacidade\\_EN\\_Mai18.pdf](https://discoveryportugal.com/wp-content/uploads/2018/05/DHM_Pol%C3%ADtica_Privacidade_EN_Mai18.pdf). Our Survey is being accessed by you via an external platform which is operated by our external provider ReviewPro. For more information related to ReviewPro Privacy Policy, see <https://www.reviewpro.com/privacy-policy/>

Thank you for your interest in taking part in Montado Resort Satisfaction Survey. The protection of your personal data is important to SUMMER C COLORS - AGRUPAMENTO TURÍSTICO E IMOBILIÁRIO - ACE, which operates under the brand name DHM DISCOVERY HOTEL MANAGEMENT (hereinafter referred to as "DHM") as management company of Montado Hotel & Golf Resort, which will handle them in accordance with DHM's Data Privacy Policy, available at [https://discoveryportugal.com/en/wp-content/uploads/2018/05/DHM\\_Pol%C3%ADtica\\_Privacidade\\_EN\\_Mai18.pdf](https://discoveryportugal.com/en/wp-content/uploads/2018/05/DHM_Pol%C3%ADtica_Privacidade_EN_Mai18.pdf) and with this notice. Our Survey is being accessed by you via an external platform which is operated by our external provider ReviewPro. For more information related to ReviewPro Privacy Policy, see <https://www.reviewpro.com/privacy-policy/>

## 1. WHY YOU ARE RECEIVING THIS SURVEY?

You are receiving this survey either because:

- You are a Montado Hotel and Golf Resort customer and DHM wants to improve the satisfaction and experience of its customers or third parties, so we want to know your opinion and expectations regarding DHM's services in general or ask you questions about the last experience or event you had with us;
- You are a potential customer and have consented to receive the DHM survey;

## 2. WHAT SORT OF PERSONAL INFORMATION WE COLLECT ABOUT YOU?

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data: first name, last name, username or similar identifier and
- Contact Data: address, email address and telephone numbers.
- Survey Data: includes the responses you give to any surveys we invite you to participate in;
- Communications Data including your correspondence with us and any feedback on our services which you provide.



We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Survey Data to carry out market research and statistical research.

However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We will never collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or information about criminal convictions and offences as part of the survey data.

If you do not wish to provide personal data when requested before starting answering to the survey, you may not be able to take part in the survey.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

Most often we will have already received your identity and contact data because we are already interacting with you as a client or a supplier. You may also give us your Identity, Contact, when you take part in our surveys or give us some feedback.

### 4. HOW WE WILL USE YOUR DATA?

PURPOSE / ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
Figure out customer expectations and needs: your feedback will help measure customer experience, satisfaction, expectations etc.	Identity Contact	Necessary for our legitimate interests
Understand the demand and supply chain to develop new customer-centric products and services.	Identity Contact Survey	Necessary for our legitimate interests
Recontact you regarding any surveys that you complete (if this is not for quality control purposes we will ask for your further permission within the survey).	Identity Contact Survey	Necessary for our legitimate interests
To manage our relationship with you which include notifying you about changes to our terms or privacy notice.	Identity Contact Communications	<ul style="list-style-type: none"> <li>· Performance of a contract with you</li> <li>· Necessary to comply with a legal obligation</li> <li>· Necessary for our legitimate interest (to keep our records updated)</li> </ul>



## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Other companies that act as subcontractors to DHM as processors and providing IT support services and system administration services.
- Service providers acting as processors who provide IT support services, IT hosting services and system administration services.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

If you are based in the EU, whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy.

Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need.

to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity

of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We retain Survey Data which is personal data between six months after we have completed any quality control checks up to a maximum of five years, depending on the survey, to allow us to compare your responses in the Surveys you have participated to. After five years, we may either delete your Survey Data or retain anonymized Survey Data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above please contact DHM Group's Data Protection Officer, via email [dpo@discoveryportugal.com](mailto:dpo@discoveryportugal.com). DHM will respond in writing (including by electronic means) to the User's request within a maximum period of one month from receipt of the request, except in cases of special complexity, in which this period may be extended up to two months.

If the requests submitted by the User are manifestly unfounded or excessive, namely due to their repetitive nature, DHM reserves the right to charge administrative costs or refuse to comply with the request

## 10. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

SUMMER C COLORS - AGRUPAMENTO TURÍSTICO E IMOBILIÁRIO - ACE, headquartered at Rua Joaquim António de Aguiar nº 66, 1070 153, Lisbon, Portugal, under the single registration number and legal person 510945961, holder of the national trademark nº 529580 DHM DISCOVERY HOTEL MANAGEMENT



We have appointed a Data Protection Officer (EPD) who is responsible for overseeing the questions in relation to this privacy notice. If you have any questions about this notice, including requests to exercise your rights, please send an email to [dpo@discoveryportugal.com](mailto:dpo@discoveryportugal.com).

You have the right to make a complaint at any time to your local data protection authority, if any, if you are not satisfied with the way we process your personal data.

We would, however, appreciate the chance to deal with your concerns before you approach your local data protection authority so please contact us at [dpo@discoveryportugal.com](mailto:dpo@discoveryportugal.com) in the first instance

## **11. CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This privacy notice was updated on August 30, 2021. DHM reserves the right to change it from time to time by posting an updated version when a new questionnaire is sent to you. The new modified or amended privacy statement will apply from the date of its revision.

In light of the above, we recommend that you periodically review this document to be informed about how we protect your personal data. It is important that the data we hold about you is accurate and current, so we ask that you inform us if there is any change to it during your relationship with us.