

Privacy, Security and Cookies Policies

Confidentiality, Security and Protection of Personal Data

The Processing of Personal Data is carried out in strict compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and/or any legislation that regulates, adds to or replaces said legislation, together referred to as the 'General Data Protection Regulation' (hereinafter referred to as GDPR).

Personal Data is obtained for the purposes of:

- The activity linked to a wholesale and retail travel agency;
- Supplying the parties involved in the services requested by the user in order to fulfil the booking / contracted service;
- Management, administration, provision, extension and improvement of the services to which the user decides to subscribe and register or use to adapt these services to the user's preferences and tastes;
- Verifying credit cards and other types of cards used for payment and indicated by the User;
- The study of the use of services by users;
- Checking, maintaining and developing statistical systems and analyses;
- Advertising, promotion and commercial prospecting activities if duly accepted by the User;
- Sending survey forms to which the user is not obliged to respond;
- Sending SMS messages for direct sales purposes, advertising or related to the contracted service.

The formalization of reservations implies the provision of personal identification data by the holders of the same, as well as aspects relating to their personal preferences, special circumstances affecting them or others, data relating to Frequent Flyer cards or others, which will be used to facilitate and enable the contracting and booking of the specific services that make up the holder's request, and also to provide information relating to Clube Viajar products and services. For security reasons, applicable to certain countries, it is compulsory to include in flight bookings, in addition to the traveler's name, information such as passport or ID card number, gender, age and nationality. This information contained in the booking may, under the terms of the applicable legislation, be consulted by the customs authorities of the countries of origin or destination.

Furthermore, the data subject expressly consents to their personal data being transferred to:

- National and international authorities competent in matters of tourism, terrorism or offences against human rights;
- Any legal entity affiliated to or participated in by Clube Viajar or the company that has provided the contracted service (hotels, water, land, rail, air transport, rental, etc.), so that they can use them for the purpose of correctly providing each service requested by the data subject.

At the time the Personal Data is collected, except in fields where otherwise indicated, the data subject may voluntarily provide the Personal Data, without the lack of response implying a decrease in the quality or quantity of the corresponding services (unless otherwise indicated). However, failure to respond to the data, which is considered obligatory, will mean that it will not be possible to access the service for which the data was requested.

Clube Viajar may disclose user information to third parties solely for the purpose of completing the booking requested and for administrative reasons, under the terms of the legislation in force for the completion of trips / services to certain countries. Any data collected will be transmitted, in accordance with the provisions of the GDPR, to the entities involved to contract the required services to the extent absolutely necessary to complete the booking / service desired and to comply with the legislation of the destination countries. Under no circumstances will information be requested about philosophical or political beliefs, party or trade union

membership, religious faith, private life and racial or ethnic origin, as well as data relating to health and sex life, including genetic data.

By accessing any personal data, Clube Viajar undertakes to:

- Custody them by means of legally required security measures of a technical and organizational nature that guarantee their security, thus preventing their alteration, loss, processing or unauthorized access, in accordance with the state of the technology at any given time, the nature of the data and the possible risks to which they are exposed;
- Use or apply the data exclusively for the purposes duly provided for;
- Ensure that the data is handled only by the workers whose intervention is necessary for the provision of the service, and that they are bound by the duty of secrecy and confidentiality. If the information may be disclosed to third parties, they must be obliged to keep it confidential in accordance with the provisions of this document.

Any personal data that its owners may disclose to Clube Viajar will be understood to have been obtained, processed and transmitted in strict compliance with the GDPR. By providing their personal data, the data subjects declare that they authorize and consent to the processing of this data by Clube Viajar for the purposes of facilitating and enabling the contracting and booking of the specific services that make up their request. Clube Viajar declares and guarantees that it has implemented, is equipped with and will continue to implement the security measures of a technical and organizational nature necessary to guarantee the security of the personal data provided to it, with a view to preventing its alteration, loss, processing and/or unauthorized access, taking into account the current state of technology, the nature of the data stored and the risks to which they are exposed.

The Personal Data provided is incorporated / stored in a computer application owned by Clube Viajar. Access to the information on file by Clube Viajar employees is only possible with the insertion of access passwords, and the record is documented. Changes to existing data in the archives are possible, with a record of the date and user code responsible for the change.

Personal Data is processed with the degree of protection legally required to guarantee its security and prevent its alteration, loss, processing or unauthorized access, and the Data Subject is aware and accepts that Internet security measures are not impregnable, taking into account the state of the art. Clube Viajar is equipped with technical infrastructures for peripheral control, including datacenter firewalls and VPNs that respect security requirements. The computer servers are hosted by a datacenter operator and a digital information protection service is provided for the hosted servers. The service includes backing up files, storing them in accordance with the defined policy and restoring them at Clube Viajar's request.

Personal data will be kept for the period necessary to fulfil the purposes for which it is processed and/or, depending on its nature, for the period to which Clube Viajar is obliged by the competent tax authorities. Clube Viajar guarantees the data subject the exercise of the rights of access, rectification, cancellation or opposition provided for by law. If the data subject wishes to exercise the rights of access, rectification, cancellation or opposition granted to them by the GDPR, they should send an email to dac@clubeviajar.pt.

Cookie Policy

Definition

'Cookies' are small text files that are stored on your computer or mobile device through your browser, retaining only information related to your preferences and therefore not including your personal data. Placing cookies will help the website recognize your device the next time you visit.

The cookies used do not collect information that could identify you. Cookies collect generic information, such as how you arrive at and use the website or the part of the country from which you access the website.

Cookies only retain information related to your preferences. At any time, you can choose to be notified of the receipt of cookies via your browser or block their entry into your system. However, if you refuse to use cookies on the website, you will not be able to access it.

Cookies used on our website

- PHPSESSID: This cookie is responsible for keeping the user logged in on all pages of the site.
- Management Tools Cookies: This website uses Google Analytics. Google Analytics is a free tool for obtaining statistical data from the internet, created by Google, whose main function is to allow website owners to know how users interact with their website. It also activates cookies in the domain of the website you are on and uses a set of cookies called ‘_utma’ and ‘_utmz’ to collect information anonymously and to show website trends without identifying individual users.

To create statistics on the use of this website, cookies are used to determine the number of regular visitors and the most interesting content. In this way, we can focus our efforts on improving the most visited areas and make it easier for users to find what they are looking for. This website consults data on behavior and may use statistical calculations relating to anonymous data to ensure continuity of service or to make improvements to its websites. For more information, see the link below to the privacy policy

[<https://policies.google.com/privacy?hl=pt>]

‘_ga”: Registers a unique ID that is used to generate statistical data on how the user uses the site

‘_ga_#”: Used by Google Analytics to collect data on the number of times a particular user has browsed the site and also to collect data on the number of times a particular user has browsed the site.

Types of cookies depending on the period they remain active:

Depending on the period in which the cookies remain active on the terminals, we can distinguish between:

- Session cookies: designed to collect and store data while the user is accessing a web page. They are usually used to store information relating to a service requested by the user on a single occasion (for example, a list of products purchased).
- Persistent cookies: represent data stored in the terminal that can be consulted and processed during a period defined by the person responsible for the cookies, which can vary from a few minutes to several years.

Types of cookies depending on their purpose:

Depending on the purpose for collecting data through cookies, we can distinguish between:

- Technical Cookies: allow the user to browse a web page or application using the different options or services available on them, such as, for example, traffic control and data communication, session identification, access to restricted parts, memorizing the elements of an order, carrying out the payment process for an order, requesting registration or participation in an event, using security features when browsing the contents of a shop or sharing sound and video content via social networks.
- Personalization Cookies: allow the user to access the service with some general functionalities, based on a set of criteria predefined in the user's terminal, such as, for example, the language, the type of browser through which they access the service, the location from which they access the service, etc.
- Analytical Cookies: allow the person responsible for cookies to monitor and analyze the behavior of website users. The information collected through these cookies is used to measure the activity of websites, applications or platforms and to draw up browsing profiles of their users, in order to introduce improvements based on analyzing the data on the use of the service users.
- Advertising Cookies: Target advertising through campaigns according to the interests and tastes of each user;
- Third-party cookies: Measure the success of applications and the effectiveness of third-party advertising.