



## PRIVACY POLICY

### WEB PORTAL

#### 1. RESPONSIBLE FOR DATA PROCESSING

**TRAVEL ONE LISBOA – Agencia de Viagens e Turismo, Lda.**, a limited company based at Centro Escritórios Panoramic, Avenida do Atlântico, office 13.03, Parque das Nações, 1990-019 LISBOA, with the e-mail address [portugal@travelone.pt](mailto:portugal@travelone.pt), telephone nr. (+351) 217 707 280, registered at the Commercial Registry of Lisbon, under the sole registration number and legal person 510 384 161, with the share capital of € 70,000.00 and the RNAVT registration nr. 3678. The economic activity code of Travel One Lisboa is 79110-R3 – CAE travel agency activities (the "Travel One ").

Travel One is responsible for the processing of personal data, collecting and processing only the necessary, appropriate, relevant, and not excessive data for the purposes identified in this Privacy Policy.

#### 2. TYPE OF DATA COLLECTED

Travel One collects directly from the holders, or their legal representatives, the following types of personal data (the "Personal Data"):

- a. Identification data, such as full name, date and place of birth, nationality(s), type, number, expiration date and issuing entity of the identification document.
- b. Contact details, including address, mobile phone number and email address
- c. Billing and invoicing data, such as tax identification number, number of insurance policies contracted and insurance details, bank details (NIB/IBAN, bank, swift, account holder name, number, CCV, and name of credit or debit card holder).

Travel One does not apply automated decision-making processes.

The data marked with an asterisk (\*) in the electronic forms available on the Web Portal are mandatory, and it is impossible to submit the form without them, to the extent that the Personal Data is collected in the context of pre-contractual procedures or in the procurement process and for compliance with legal obligations, which means that its provision is a necessary legal requirement for pre-contractual due diligence and contractual execution , and if not provided, no service may be provided.

#### 3. PURPOSES AND LEGAL BASIS

The collection of Personal Data is intended to enable one or more of the following purposes:

- a. **Provision of services**, either for the creation of a user account for the purposes of booking and concluding travel contracts, or for the performance of travel services or related services, under article 6(1) (b) of the **GDPR** (= **GENERAL DATA PROTECTION REGULATION** )

- b. **Compliance with legal obligations**, in particular identity verification, accounting and tax obligations, registration and proof of commercial transactions, provision of pre-contractual information and payment processing, as well as compliance with judicial, administrative, or any competent authority under the provisions of Article 6(1) (c) of the GDPR;
- c. **Information and clarification** of doubts and problem solving of the Web Portal and its functionalities, as well as quality control, under the provisions of article 6(1) (f) of the GDPR;
- d. **Sending direct marketing communications**, including information and advertising about services, newsletters, products, promotions and recommendations, offers and special and loyalty campaigns even if a contractual relationship is not formalized, under the provisions of article 6(1) (a) of the GDPR;
- e. **Optimisation of user experience** and the features of the Web Portal, under the provisions of article 6 (1) (a) and (f) of the GDPR.

In these terms, Personal Data is collected on the basis of the consent of the holder (paragraphs 4 and 5), which may be cancelled at any time, in the performance of contractual relationships (including the Terms and Conditions of the Web Portal and any contract for the provision of travel services entered into by the holder), in compliance with Travel One's legal obligations and also for the legitimate interest thereof.

#### 4. FILE TERM

Personal Data is kept within the time limits laid down by applicable law, in particular for tax purposes (10 years), to report to the supervisory authority for the time limits necessary for the performance of contracts and until the limitation period of contractual rights (general rule, 20 years) is elapsed.

Where there is no specific legal or contractual requirement, the data will be stored and kept only for the minimum period necessary for the purposes that motivated its collection and/or subsequent processing or for the period authorized by the National Data Protection Commission or by an entity that replaces it.

#### 5. DISPOSAL

Without prejudice to compliance with the legal or contractual file deadlines, the Personal Data will be deleted in the following cases, unless expressly indicated by the holder to the contrary:

- a. when they are no longer necessary or relevant to the purpose for which they were collected.
- b. When requested by the holder, in the exercise of the right of cancellation.
- c. After the legal period of conservation.
- d. After one year of not using the Web Portal.
- e. Three months after the user account has been closed.



## 6. RECIPIENTS

In addition to Travel One, there may have access to your data:

- External Auditors.
- Subcontracted entities that support Travel One in information collection and processing matters and activities, namely: information technology, insurance, accounting office.
- Suppliers and Service Providers contracted in the context of the provision of services provided by Travel One.

The making of a reservation and the provision of the requested data constitute, by the Client, consent to the transfer of the same, because it is essential to the provision of the contracted services.

## 7. UPDATING

At Travel One we undertake to comply with our obligation of secrecy about Personal Data and the duty to store it confidentially, adapting the necessary measures to prevent its alteration, loss, processing or unauthorized access, always taking into account the state of the technology.

Technical and organizational security measures are regularly reviewed and updated according to the needs and state of the art. Changes will not be implemented that result in less effective protection of Personal Data without the consent of the holders

## 8. HOLDERS' GUARANTEES

Holders acknowledge that their Personal Data is collected on open networks and undertake to take additional security measures, including ensuring that they use devices and browsers with up-to-date security settings, keeping the firewall active, antivirus and anti-spyware up to date and making sure the authenticity of the websites they visit, recognizing that, if they do not, Personal Data may be viewed and used by unauthorized third parties, travel one cannot be held responsible for this.

The holder guarantees that all Personal Data provided are true, complete and up-to-date and that he/she is aware that he/she is solely responsible for the data, namely for its veracity, completeness and timeliness, and that it may suffer civil or criminal consequences due to falsehood, error, inaccuracy or any other defect.

## 9. HOLDERS' RIGHTS

Travel One undertakes to provide data holders, or their representatives, with all information in a concise, intelligible, and easily accessible manner, using clear and simple language.

At any time, the data holders can access their data, cancel, or modify it, free of charge. To do so, an email must be sent to [protecaodedados@travelone.pt](mailto:protecaodedados@travelone.pt). Travel One undertakes to respond within a maximum of 20 days from the date of the request.

Personal Data holders' rights are also:

- a. **Right of cancellation.** Holders have the right to withdraw their consent to the processing of Personal Data at any time, where the exclusive legal basis for their collection was consent. To this end, you must contact Travel One in writing, through the means indicated in this Privacy Policy. The request for cancellation of consent does not call into question the treatment already made, nor the fulfilment of legal obligations.
- b. **Right to be forgotten** right to request your data to be erased, in the cases provided for in Article 17 of the GDPR, except for the data that is necessary to keep under the law or contract.
- c. **Right to limitation of processing:** right to pre-emptive (i) inaccurate or incorrect data, (ii) unlawfully processed data, without the holder requiring payment, (iii) data no longer used, but which are required for the purposes of declaration, exercise or defence of a right in a judicial process, and (iv) in case of opposition to the processing, while it is verified whether there is a legitimate interest prevailing from the controller. In such situations, Travel One shall store the data only or process it with the consent of the holder, or for the purposes of the declaration, exercise or defence of a right in legal proceedings, the defence of the rights of another individual or legal person, or for significant reasons in the public interest of the European Union or a Member State;
- d. **Right of portability:** right to request the delivery of the data in a structured format of current use and automatic reading and the right to transmit such data to another person responsible and application, in accordance with Article 20 of the GDPR;
- e. **Right to obtain a copy** of the data under processing, through the payment of a fee for administrative charges;
- f. **Right not to be subject to any decision taken solely on the basis of automated processing,** including profiling, which has an effect on its legal sphere or affects the Holder significantly in a similar manner, in accordance with Article 22 of the GDPR;
- g. **Right to be informed of a breach of personal data** which may entail a high risk to your rights and freedoms, with the exceptions provided for in Article 34 of the GDPR;
- h. **Right to lodge a complaint** with the National Data Protection Commission or any other supervisory authority.

## 10. COOKIES

We use cookies and/or similar technologies to analyse client behaviour, administer the Web Portal, detect users' movements, and collect information about them. This is done to personalize and enhance your experience with us

A cookie is a small text file stored on your computer. Cookies store information that is used to help improve the functioning of the Web Portal. You can control your cookies in your internet browser. However, choosing to disable or delete cookies may prevent the use of certain functions in the Web Portal.



**We use cookies for the following purposes:**

- a. **Cookies required** - these cookies are necessary for you to use some important features on our website. These cookies do not collect any personal information.
- b. **Functionality cookies** - these cookies provide functionality that makes the use of the website more convenient and enables the use of personalized features. For example, remembering your name and email address in forms, so you do not have to re-enter this information.
- c. **Analytical cookies** - these cookies are used to track the use and performance of our website and services.
- d. **Advertising cookies** - these cookies are used to provide relevant advertisements for you and your interests. In addition, they are used to limit the number of times you see an ad.

## **11. VERSION AND CHANGES**

This Privacy Policy was updated on **12.10.20**

Travel One reserves the right to change this Privacy Policy at any time, which will give notice to users registered by email or by any other appropriate electronic means. If the Holder continues to use the Web Portal, it shall be considered that he/she accepts all changes without reservation.

This Privacy Policy applies exclusively to the Web Portal, not to third-party websites or applications, so if the owner visits another website or uses another application from the Web Portal, you should consult its privacy policy and verify that you agree to its terms before providing your Personal Data.