



Canadiano Urban Nature Hotel, headquartered at Rua do Contador 24-A, 9500-050 Ponta Delgada, Azores, Portugal, is a company dedicated to accommodation services on the island of São Miguel, in the Azores archipelago. It owns the domain www.hotelcanadiano.com, where the WEBSITE is housed.

CANADIANO URBAN NATURE HOTEL IS COMMITTED TO PROTECTING THE PRIVACY AND PERSONAL DATA OF ITS CUSTOMERS AND WEBSITE USERS, AND HAS DESIGNED AND ADOPTED THIS POLICY AND PRACTICES DESCRIBED HEREIN. THIS PRIVACY POLICY EXPLAINS HOW YOUR PERSONAL DATA IS COLLECTED AND PROCESSED, SO WE ADVISE YOUR READING TO DISCOVER THE CONDITIONS YOUR PERSONAL DATA IS COLLECTED AND USED.



## 1. WHAT IS THIS POLICY FOR?

- 1.1. This Privacy Policy explains how we collect and process the personal data that is necessary for the provision of services that are available through the WEBSITE.
- 1.2. Example of this service is the automatic online booking of accommodation.
- 1.3. The goal is for this service to be provided in a clear and concise way, describing the practices adopted for this purpose.

## 2. WHAT IS PERSONAL DATA?

- 2.1. Personal data means all information relating to a person and identifying that person, or making it identifiable, irrespective of the nature and support of the information and including the sound and image of the person.
- 2.2. Examples of personal data we collect: name, phone, email.
- 2.3. Identifiable data should be understood to mean something that can lead to being identified, directly or indirectly, in particular by reference to an identification number or other factors specific to a person's physical, physiological, mental, economic, cultural or social traits.



#### 3. HOW DO WE USE YOUR PERSONAL DATA?

- 3.1. Canadiano will use the personal data you provide us for the following purposes:
- (a) For user registration;
- (b) For your access to the user area;
- (c) For the provision of the services, products and goods you wish to purchase;
- (d) To analyze and respond to your messages, customer support and requests for information;
- (e) To analyze and follow up on your application process to work with Canadiano;
- (f) So that we can send newsletters at your request;
- (g) For operations and management of the WEBSITE;
- (h) To keep track of your contact details;
- (i) To keep track of your shopping and/or booking details;
- (j) For commercial purposes, such as data analysis, audits;
- (k) For fraud prevention;
- (l) For adaptation, improvement and modification of services, including through the identification of user trends, or to determine the effectiveness of promotional campaigns;
- (m) For the expansion of commercial activities of Canadiano.
- 3.2. These personal data processing operations are an essential tool for your satisfaction and for the activity of Canadiano and are carried out according to the applicable legislation and according to the best practices.
- 3.3. Your personal data will not be reused for other purposes that are previously identified or that have nothing to do with those purposes for which they were initially collected.



# 4.WHAT ARE THE FOUNDATIONS FOR TREATING THE PERSONAL DATA COLLECTED?

4.1. The personal data that Canadiano collects has specific grounds for the purposes for which they are intended.

4.2. In the following table you can see the reasons for the above purposes:

| Goal                                                                                                                                                                 | Foundation                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| For user registration                                                                                                                                                | Precontractual diligences on the request of the data                         |
| For your access to the user area                                                                                                                                     | Precontractual diligences on the request of the data                         |
| For providing accommodation services                                                                                                                                 | Contractual obligation                                                       |
| To analyze and respond to your messages,<br>customer support and requests for<br>information                                                                         | Consent for this specific purpose                                            |
| To keep track of your shopping and / or booking details                                                                                                              | Consent for this specific purpose                                            |
| To be able to send newsletters or other publications that you have requested and / or that may be of interest to you                                                 | Consent for this specific purpose                                            |
| For operations and management of the WEBSITE                                                                                                                         | Consent for this specific purpose                                            |
|                                                                                                                                                                      | Legitimate interests pursued by Canadiano                                    |
| To keep track of your contact details                                                                                                                                | Consent for this specific purpose                                            |
|                                                                                                                                                                      | Consent for this specific purpose                                            |
| For commercial purposes, such as data analysis, audits                                                                                                               | Legitimate interests pursued by Canadiano                                    |
| For fraud prevention                                                                                                                                                 | Legitimate interests pursued by Canadiano                                    |
| For the adaptation, improvement and modification of services, in particular by identifying trends in use, or to determine the effectiveness of promotional campaigns | Consent for this specific purpose  Legitimate interests pursued by Canadiano |
| For the expansion of commercial activities of Canadiano                                                                                                              | Legitimate interests pursued by Canadiano                                    |



## 5. WHAT PERSONAL DATA DO WE COLLECT?

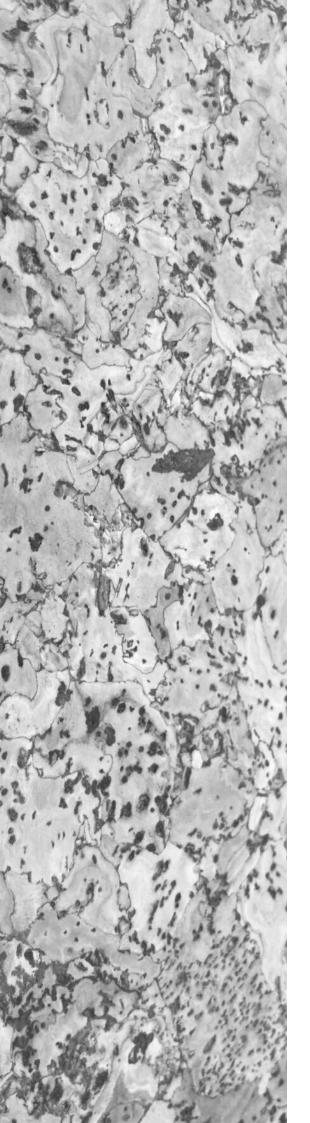
- 5.1. The personal data that Canadiano collects and uses is only for what is needed and suitable for the above stated purposes.
- 5.2. Canadiano will collect and process personal data:

| Goal                                                                                                                                                                                | Foundation                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| For user registration                                                                                                                                                               | First Name, Last Name, E - mail                                                                                                                                   |
| For your access to the user area                                                                                                                                                    | E - mail  First Name, Last Name, E-mail, Telephone,  Street Address, Zip Code, Sex, Date of Birth;  Credit card number, Name of the credit card                   |
| For providing accommodation services                                                                                                                                                | holder, Security code (CVC), Passport<br>information                                                                                                              |
| To analyze and respond to your messages, customer support and requests for information                                                                                              | E-mail, Name                                                                                                                                                      |
| To keep track of your shopping and<br>/ or booking details                                                                                                                          | First Name, Last Name, E - mail, Telephone,<br>Street Address, Zip Code, VAT/GST, Sex, Date of<br>birth; Credit card number, Name of the holder,<br>Security code |
| To be able to send newsletters or<br>other publications that you have<br>requested and / or that may be of<br>interest to you                                                       | Name, E - mail                                                                                                                                                    |
| For operations and management of the WEBSITE                                                                                                                                        | Name, E - mail                                                                                                                                                    |
| To keep track of your contact details                                                                                                                                               | First Name, Last Name, E - mail, phone, address, ZIP code, VAT, Gender, Date of birth                                                                             |
| For commercial purposes, such as data analysis, audits                                                                                                                              | Name, E - mail                                                                                                                                                    |
| For fraud prevention                                                                                                                                                                | Name, E - mail                                                                                                                                                    |
| For the adaptation, improvement<br>and modification of services, in<br>particular by identifying trends in<br>use, or to determine the<br>effectiveness of promotional<br>campaigns | Name, E - mail                                                                                                                                                    |
| For the expansion of commercial activities of Canadiano                                                                                                                             | Name, E - mail                                                                                                                                                    |



### 6. HOW DO WE COLLECT YOUR PERSONAL DATA?

- 6.1. We will collect your personal data through the forms present on the WEBSITE, but also through the WEBSITE and the communication it makes with your devices and e-mail messages that you send us.
- 6.2. Your personal data is collected through your devices as follows:
- (a) Registration and user data;
- (b) Purchase data;
- (c) Through your subscription to the newsletter;
- (d) Through your browser;
- (e) Through cookies;
- (f) Through pixel tags and other similar technologies;
- (g) IP address;
- (h) Through your User data.
- 6.3. Canadiano agrees to treat your data according to the law and legitimate way.
- 6.4. Canadiano will not sell, rent, or share your personal information with third parties except in cases clearly identified in this Privacy Policy (see item 11 to see how).
- 6.5. The services of Canadiano are not directed at minors, and personal data of minors are not intentionally treated.



### 7. WHAT ARE COOKIES?

- 7.1. Cookies are small files of information that help identify your browser and that can store information, for example, settings and user preferences.
- 7.2. Canadiano will store cookies on your device to customize and facilitate browsing as well as troubleshooting, statistics, quality assurance, and to monitor system security.
- 7.3. Except for cookies specifically necessary for the performance of the website, the storage of other cookies will always depend on the acceptance and consent of the User, and this consent may be withdrawn at any time through specific browser tools.
- 7.4. To learn more about the cookies we use, you should consult our Cookies Policy.



## 8. WHAT ARE PIXEL TAGS AND OTHER SIMILAR TECHNOLOGIES?

8.1. The pixel tags (also known as web beacons and clear GIFs) can be used in connection with some services to, for example, track the actions of service users (including email recipients), measure the success of our marketing campaigns, and compile statistics on the use of the Services and response rates.

8.2. To learn more about the pixel tags and other similar technologies that we use, please refer to our Cookies Policy.

### 9. HOW DO WE PROTECT YOUR PERSONAL DATA?

9.1. Your personal details are kept safe by adopting various security measures of a technical nature (the data is kept on secure servers with Rackspace US, Inc. (Hereinafter, "Rackspace") which is based at Fanatical 1 Place City of Windcrest San Antonio , TX 78218 , United States of America, and gives us all the safety guarantees) and organizational (only have access to data employees and processes that must access them as rules created for this purpose) that allow you to protect personal data against its spread, loss , improper use, alteration, treatment or unauthorized access as well as against any other form of illicit treatment.

9.2. In order to protect your personal data we only use data center providers who provide us with adequate and documented security measures, namely, ensuring that your personal data is stored on servers that are maintained in controlled environments with limited access.



- 9.3. Likewise, when browsing the WEBSITE, we protect your data with encryption, such as Transport Layer Security (TLS is a security protocol that protects telecommunications via the Internet) and your password is stored using a one-way hash, and cannot be recuperated to (or divulged) by any person, including Canadiano, and can only be redefined.
- 9.4. Although we take the precautions we deem appropriate to protect the personal data you provide and collect, you must be aware that no security system is impenetrable.
- 9.5. So, you must take personal precautions to keep your data safe, for example, maintain a secret keyword and not divulging it to anyone else; If you believe that your password has been misused, you should notify us immediately; you should also be careful to start and end the session whenever you close your browser.

### 10. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

10.1. Your personal data will be kept for the time necessary for the purposes for which it is intended, as set forth in this Privacy Policy as follows:



| Goal                                                                                                                                                                 | Foundation                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
|                                                                                                                                                                      |                                             |
| For user registration                                                                                                                                                | Until the customer requests to be forgotten |
| For your access to the user area                                                                                                                                     | Until the customer requests to be forgotten |
| For providing accommodation services                                                                                                                                 | Until the customer requests to be forgotten |
| To analyze and respond to your messages, customer support and requests for information                                                                               | Until the customer requests to be forgotten |
| To analyze and follow up on your application process to work with Canadiano;                                                                                         | 1 year                                      |
| To be able to send newsletters or other publications that you have requested and / or that may be of interest to you                                                 | Until the customer requests to be forgotten |
| For operations and management of the WEBSITE                                                                                                                         | 30 days                                     |
| To keep track of your contact details                                                                                                                                | Until the customer requests to be forgotten |
| For commercial purposes, such as data analysis, audits                                                                                                               | Until the customer requests to be forgotten |
| For fraud prevention                                                                                                                                                 | 18 months                                   |
| For the adaptation, improvement and modification of services, in particular by identifying trends in use, or to determine the effectiveness of promotional campaigns | 18 months                                   |
| For the expansion of commercial activities of Canadiano                                                                                                              | Until the customer requests to be forgotten |
| Credit Card Information                                                                                                                                              | 30 days after finalization of reservation   |



10.2. If any specific or mandatory period of time is required by law, the period of retention of the data will be the same. In all other cases, personal data will be kept for a maximum of the times indicated above, periods in which Canadiano understands to be sufficient to comply with the desired purposes.

10.3. At the end of the storage period, all personal data collected will be deleted.

# 11. HOW YOU CAN EXERCISE YOUR RIGHTS:

11.1. Before we explain how you can exercise your rights, you should know what they are. Thus, the legislation grants you the right to request us, as the person responsible for the processing, (a) access to personal data concerning you, as well as your (b) rectification or deletion, and (d) limitation of the treatment with respect to it, or the right to (e) oppose processing, as well as the right to (f) portability of data. You also have the right to submit a complaint to a supervisory authority (National Data Protection Commission - www.cnpd.pt).

11.2. What each of these rights means:



- (a) <u>Access</u>: the right to obtain confirmation that the personal data concerning you are treated or not, and, if it is the case, the right to access your personal data;
- (b) <u>Rectification</u>: the right to have rectification of inaccurate personal data concerning you and your incomplete personal data completed;
- (c) <u>Deletion</u>: the right to obtain the deletion of your personal data when one of the reasons listed in the legislation applies;
- (d) <u>Limitation of treatment</u>: the right to obtain a limitation of treatment if one of the situations listed in the legislation applies;
- (e) <u>Opposition</u>: the right to oppose at any time the processing of personal data concerning you;
- (f) <u>Portability</u>: the right to receive personal data concerning you in a structured, current and automatic reading format.
- 11.3. You also have the right to submit a complaint to a supervisory authority (National Data Protection Commission at www.cnpd.pt)
- 11.4. For the purpose of exercising the above rights you should contact Canadiano by e-mail: book@hotelcanadiano.com
- 11.5. If you ask us to delete some or all of your personal data, some of the requested services may not be provided to you, and Canadiano will keep the personal data necessary to fulfill your legal obligations.



### 12. WHEN DO I COMMUNICATE MOST DATA TO THIRD PARTIES?

- 12.1. Canadiano may use third parties to provide certain services, the level of maintenance, technical support, marketing, billing and payment management, and they may have access to some of the personal data, including the data needed for the contracted purposes.
- 12.2. Canadiano ensures that entities that have access to data are credible and offer high guarantees protection, never them being transmitted data beyond what is necessary to provide the contracted service, but Canadiano is also responsible for the personal data provided.
- 12.3. Canadiano can still communicate their data to companies of its corporate group with whom Canadiano has commercial partnerships for the establishment and provision of benefits or, other partners outside their enterprise group. However, we will only share with prior authorization from you.
- 12.4. Canadiano can still transmit data to third parties in investigations, judicial investigations and processes and/or administrative or similar nature, since to do so is properly ordered by court order in this regard.



### 13. THIRD PARTY WEBSITES

13.1. The WEBSITE Power will contain links to other websites which may collect their personal data, and this treatment is the responsibility of the owners of these websites, not holding Canadiano liable for their policies and/or practices.

13.2. Example of such third parties include Facebook or Google (YouTube) through the buttons that are present on the WEBSITE.

### 14. TRANSFERS OF DATA OUT OF THE EUROPEAN UNION

14.1. In regards to data transfers to third countries outside the European Union, Canadiano will comply with the law, according to the suitability of the country of destination, for the protection of personal data and the requirements that apply to them personal data to jurisdictions that do not provide security and protection guarantees.

### 15. THE MINORS

15.1. The WEBSITE is not intended for minors under the age of 16, so we request that these minors do not provide us with personal information through the WEBSITE, application, social media and social media or e-mails.

### 16. SENSITIVE PERSONAL DATA

16.1. Canadiano requests that customers do not send us nor provide us with any sensitive personal data, i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, data health or data relating to a natural person's sexual life or sexual orientation.

16.2. This personal data will be deleted immediately.



### 17. CHANGES TO PRIVACY POLICY

17.1. Canadiano reserves the right to adjust or change this Privacy Policy at any time, as these changes are publicized.

### 18. OUR CONTACT DETAILS

18.1. If you have any questions or concerns regarding this Privacy Policy please contact us by email: book@hotelcanadiano.com

### 19. LATEST VERSION

19.1. July 14th, 2021. Ponta Delgada, Portugal