



Privacy is very important for us. That means we are committed to protecting and safeguarding any personal data you give us. We act in our customer's interest and we are transparent about the processing of your personal data.

This document describes how we use and process your personal data. We are aware that this document is very extensive and boring that's why we try to use a simple and easy to read and understandable text. We also tell you how to contact us if you have questions or doubts about your personal data. This document includes also our websites and mobile apps, on-line book tools and platforms, social media, etc..... For further info about how we make use of COOKIES and similar technologies please see at the end of this document our "Cookies Statement".

If you have used our services before, you know that we offer you accommodation, spa and medical spa services and accommodation related services, information given by us personally, by phone, via email, or through our websites and mobile apps as well as through other on-line platforms like partners websites or social media. Why are we informing you about these subjects? Because our Privacy statement applies to all these platforms and contact forms.

This Privacy Statement applies to any kind of information we collect through these platforms or other means connected to us (such as contacting our team by phone or email, etc...) It's here less time-consuming reading.

Empresa das Águas do Gerês, S.A. might amend the Privacy Statement from time to time. If you care about your privacy, visit this document regularly to know exactly where you stand. However, if we shall process your personal data for other purposes than communicated in the past in this Privacy Statement, we will notify you of these changes before the new activities began. If you do not agree with this Privacy Statement, you should discontinue using our services. If you agree with our Privacy Statement, then you are all set to book your next visit to Gerês. We look forward to receive you in our facilities. Have a nice trip!

#### WHAT KIND OF PERSONAL DATA WE COLLECT?

We can't help you on doubts and info concerning our services and facilities if we do not collect some basic stuff about you and your needs – your name, your preferred contact details, data of anybody traveling with you, your payment information. You can also decide to ask for special requests (ex: certain preferences). Beyond this data we can also collect info about your computer, phone or mobile, tablet or other device you're using to access our services. This can include the IP address, the browser you're using and language settings. There are also situations when we receive information about you from others or automatically collect other information. If you wish to know more about this, please see above "WHAT KIND OF PERSONAL DATA IS COLLECTED BY OUR COMPANY"

Medical Spa customers and customers which uses Termas do Gerês clinical services: Beyond the information concerning your personal data which we provide you throughout this Privacy Statement, you must be aware that we will also collect from you, biometric data and health data such as your physical and clinical condition, etc... for purposes like treatments prescription, audit purposes, continuous improvement of our services and services management. If you wish to have more info about this theme, see below "WHAT KIND OF PERSONAL DATA IS COLLECTED BY OUR COMPANY"

#### WHY WE COLLECT AND USE YOUR PERSONAL DATA?

Your personal data is used to help us to clarify your doubts and information issues in order to provide you with sufficient information so you can do your book and insure you to get the best services you asked for.

We also use your personal data to contact you in case you need any answer from us, to provide you with complementary info for your stay or service you requested, in answering any suggestion or complaint you might want to share with us, to offer you special promotions and conditions, to insure you get the prizes you won, to follow the Recommendation Program (in case you are a Medical Spa customer) and to inform you about our latest offers and promos which we think will interest you most. There are many other reasons to use your personal data. If you wish to have more info concerning this theme see below "WHY WE COLLECT AND USE YOUR PERSONAL DATA?"

#### HOW WE SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

There are different parts integrated into the booking and info services in various ways for various reasons. The main purpose is to share your data relevant for your stay or when you use our services with other partners, such as travel agencies, mountain activities companies, on-line booking platforms, etc.... once you choose any other platform than ours to book our services. Sometimes you might ask us to book for you services from other companies (mountain activity services, restaurants and others) and we will need to share some of your personal data with them. We will also share some of your personal data with institutions such as financial institutions, governmental authorities and others.

WE WILL NOT SELL, MARKETED OR RENT YOUR PERSONAL DATA. For further info, see below "WITH WHOM WE SHARE YOUR PERSONAL DATA"

#### HOW WE PROCESS THE COMMUNICATIONS YOU MIGHT SEND TO US

To answer your requests, info demands or booking issues, we must use your personal communications data in order to provide you with all the details and info you need to have from us. We will always send you all details so we can fulfill your needs.

#### HOW WE USE MOBILE DEVICES?

If you visit our website, using mobile devices, we will also collect and process your personal data. The process is the same we use when you visit our website using a PC.

#### HOW WE USE SOCIAL MEDIA?

We use the social media to disclose general information about events in Gerês, to send messages, to inform about promos and to improve and facilitate the access to our services and to our booking tools. When you visit our pages, we collect some of your personal data, and the social media provider receives also some of your information.

#### WHAT SECURITY AND RETENTION PROCEDURES WE USE TO SAFEGUARD YOUR PERSONAL DATA?

We adhere to appropriate and adequate procedures to prevent unauthorized access to, and the misuse of, personal data we process.

We use appropriate business systems and procedures to protect and safeguard the personal data you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorized personnel are permitted to access personal data in the course of their work.

The use, access and process of sensitive and health data is much more protected and restricted than the regular personal data. Only special authorizations are given to access, use and process this kind of data, such as the ones our physicians have.

We will retain your personal data for as long as we deem it necessary to enable you to use our services. We will retain your personal data from 1 to 10 years, for legal motifs and it will be subject to this Privacy Statement.

## HOW WE DEAL WITH CHILDREN PERSONAL DATA?

We do not want or look to have in our possession children personal data. However, we cannot guess the age of the people who contact or access our websites and apps. If a minor (how is defined by law) give his personal data without the consent of his parents or legal guardians, we ask parents to contact us in order to eliminate this personal data. We will process children personal data with the proper authorization given by parents or legal guardians.

## HOW CAN YOU CONTROL PERSONAL DATA YOU'VE GIVEN US?

You always have the right to review the personal information we keep about you. You can request an overview your personal data by emailing us to email address below. You can also contact us if your personal information is not correct, if you do not want us to keep your personal information anymore. If you want to find out more about your rights to control your personal data, read more "WHY WE COLLECT AND USE YOUR PERSONAL DATA?"

## WHO IS RESPONSIBLE FOR THE USE AND PROCESSING OF YOUR PERSONAL DATA?

EMPRESA DAS ÁGUAS DO GERÊS, SA controls the processing and the use of your personal data. We are a private company subject to Portuguese law. Our address: Av. Manuel Francisco da Costa, 125, 4845-067 Gerês, Portugal.

DPO (Data Protection Operator)

Name: Encarregado de Proteção de Dados;

Adress: Praça dos Lavadores, nº200, 4460-302 Senhora da Hora, Porto, Portugal.

Email: [RGPD@TermasdoGeres.pt](mailto:RGPD@TermasdoGeres.pt)

## WHAT KIND OF DATA DOES OUR COMPANY COLLECT?

When you contact us to ask for information and booking details we will, at least, ask for your name and contacts. We also can ask for other personal data, such as address, payment data, birth date, name of any guests travelling with you, nationality and any preferences or restrictions you might have for your meals or other preferences or restrictions which may be important for the service we are going to provide you.

If you want to reach us through other means (social media, travel agencies, etc....) we will access your personal data too. We also may ask you to fill our quality forms or even to send us some comments and suggestions. We will also collect your personal data from these documents.

You can also participate on the Recommendation Program, to win some prizes while you are staying with us. We are also collecting personal data from you with these actions.

You may want to book our services to your friends or on behalf of someone else. We alert you that is your responsibility to ensure the person or people you've provided personal information about, are aware that you've done so have accepted how we use them information as described in this Privacy Statement.

Medical Spa customers and customers which uses Termas do Gerês clinical services: Data collected and included in your clinical file, may be anonymized and, later on, used in scientific studies. This data will only be processed by professionals obliged to secrecy e when needed to health care services when requested by a legal authority. If you want to benefit from your health insurance in our services or any other health system you might have, we shall provide your insurance company and health system company with some of your personal and health data. All necessary data will be preserved in accordance with the legislation and for the term defined by law. The customer is guaranteed, through verification of the legal conditions, the right of access, rectification, erasure and portability of their personal data, or limitation or opposition to their treatment, directly through contact in person at the Medical Spa, written request to the address email RGPD2.

Your access to your own clinical file and personal data is guarantee, under legal conditions. You can ask us to modify, delete your personal data or send to others your personal data or even ask us to limit or denied the use of your personal data. You only have to contact us directly at the front desk or send us an email to our email address RGPD2.

The client is guaranteed, through verification of the legal conditions, the right of access, rectification, erasure and portability of their personal data, or limitation or opposition to their treatment, directly through contact in person at the Spa, written request to the address. In this context, data may be transmitted to subcontracted entities for the provision of services, under the terms of the agreements entered into with them, or to third parties for the purposes set forth herein and for the purposes of complying with legal obligations of the unit, National Commission for Data Protection (CNPD) or other control authorities, a court order, or for the protection of the vital interests of clients, or for the purpose of accreditation of the health unit or certification of its services, as well as for the evaluation and health service levels of service.

The data collected and included in its clinical process may still be anonymised and subsequently used in scientific work and studies, including retrospective or prospective studies.

Data relating to your health will only be processed by professionals required to be insured and to the extent necessary for the provision of health care, and may be communicated to your family members, where the exercise of a right in legal proceedings or for the diagnosis of hereditary or genetic diseases, if it is physically or legally incapable of giving its consent. If you want the services provided by the health unit to be covered by your health insurance or subsystem, the health data related to such services may be communicated to the Insurance Company or to the subsystem of health for which it is a beneficiary, to secrecy.

The personal data necessary for the provision of health care will be kept in accordance with the legislation applicable to the hospital documentation file and the deadlines defined therein.

The client is guaranteed, through the verification of the legal conditions, the right to access, rectify, erase and portability of his / her personal data, or limitation or opposition to its treatment, directly through face-to-face contact at a health facility, written request for email address [RGPD@TermasdoGeres.pt](mailto:RGPD@TermasdoGeres.pt). Access to your health information may be exercised directly (or by third parties with your consent or under the law), or through a physician, if requested by the Client, upon written request addressed to the Data Protection Officer.

#### PERSONAL DATA WE COLLECT AUTOMATICALLY

After contacting us, you may end up not confirming any reservation with us. However, whenever you contact us via email, phone or visit our websites or applications we will collect certain information automatically. Depending on the medium you used, we may collect your telephone number and email address, your IP address, the date and time you accessed our services, the hardware, software, or Internet browser you used and information about the operating system your computer. We may also collect information on the versions of the applications and the language settings you used, as well as the click and page information displayed to you.

Similarly, if you use a mobile device, we may collect information that identifies that device, application failures, and other system activity. When making a reservation, our system can register which means and website used to make the reservation or to access our websites.

#### PERSONAL DATA WE RECEIVE FROM OTHER SOURCES

Not only do we have information that we can provide. Sometimes we also receive information from you from business partners such as travel agents, operators, online booking platforms and other companies. All information we receive from these other sources may be supplemented by the information we receive from you. For example, when you make a reservation of our services through a partner or intermediary of ours (eg travel agency, online platform, etc ...), and you provide them with your personal data, this will send us your data to that we can continue with the service you want. We also integrate external service providers to facilitate the receipt of your payment. These suppliers will have access to your data so that we can make the due receipt and be able to guarantee that everything runs smoothly and safely.

Another example is some communication services that we can integrate in our platforms so that we can communicate with us and with the partner that chose to make your reservation. In this case we receive meta data about your communications (how and from where you have communicated, who is, date and duration of the call, etc....). We can also provide some specific contacts for sending Happy Holidays, Happy Birthday wishes, etc....

## WITH WHOM WE SHARED YOUR PERSONAL DATA

We do not sell or rent your personal data. However, we need to share your personal data with some partners and for several reasons: Suppliers of services that you wish to enjoy and that we have to contact and contract so we can complete your information or reservation requests. This point is important for services that are not directly provided by our company, but that you want us to handle the reservation. Depending on the reservation you wish to make, we may need to provide your name, contact information, payment details, your companion's name and any preferences or restrictions you have specified in your order. If you have any questions, we can contact the supplier and ask them to handle your request. In the case of disputes related to the reservation process of these services we will provide the information related to the reservation process that is necessary to handle the dispute. These may include a copy of the exchanged communications, a reservation confirmation, etc....

Our Suppliers of billing and reservation software. Sometimes we have to give access to our billing, reservation and communication systems to our partners who provide us with support and maintenance services, billing software, reservations, communication, etc..., especially when making online reservations, when there are system errors, when there were verified operations that were not requested, in case of failure, etc... At that time, these suppliers will have access to your data. However, we all have a statement of compliance with the RGPD, so that they cannot use and / or transfer any personal data in our systems.

Our Hosting Providers, Domains and Websites. Similar to the software program partners, we also have partners who provide us with services for the development, implementation and maintenance of our websites and online platforms, our social networks, our lodgings and domains, our emails, etc. .... also, for them, in case of maintenance, malfunction, tool development, etc. ... may have to access our systems and have access to your personal data. We also have a statement of compliance with the RGPD so that they cannot use and / or transfer any existing personal data in our systems.

Financial institutions and payment service providers. Whenever a payment is requested for confirmation of reservation or other purpose, we will have to share certain information with the service provider and the financial institution so that the payment can be processed. We may also share information with financial institutions if we consider it to be strictly necessary for fraud detection and prevention.

Government authorities and other entities that we are required by law to provide your data if necessary. We disclose personal information to law enforcement officers in accordance with applicable law or if it is strictly necessary for the prevention, detection of criminal and unlawful acts and fraud or if we are legally required to do so. We may have to give more data to the authorities in order to protect and defend our rights and properties or the rights and properties of our partners.

We may have to deal with overbooking situations and thus have to provide your personal data to a supplier who will provide the service booked by you in our company instead of ourselves. Also, in this case we have the declaration of compliance with the RGPD, so that they cannot use and / or assign any personal data provided by us other than for the specific fulfillment of the contract in question.

Your data may be transmitted for the purposes of compliance with legal obligations, decisions of the National Data Protection Commission (CNPD) or other control authorities, a court order, or for the protection of vital interests of customers, or for the purpose of certification of our services and accreditation of our establishments, as well as for evaluation and measurement of the service levels of our activities.

They may also be used for the purposes of complying with the obligation of transfer for statistical purposes, whenever requested by various entities and governmental institutions, according to the legislation in force.

## HOW DO WE PROCESS THE COMMUNICATIONS SUBMITTED BY YOU AND BY THE BUSINESS PARTNERS?

When you communicate with us you use telephone, email, website, online platforms, intermediaries, etc..... We reserve the right to block receiving or review communications that we believe to be malicious, spam, or pose a risk to you and to us, our partners or others. Note that all communications sent or received through electronic communication tools will be received and stored by our company.

## WHY DO WE COLLECT AND USE YOUR PERSONAL DATA - PURPOSES?

Whenever you contact us, whether by telephone, via email, through our websites, through other online platforms or through our partners, your personal data can be used as follows:

1. To provide you with information and clarifications of any questions you may have about our services, reservation form, etc.
2. To manage your booking or booking
3. In order to be able to receive it more comfortably and personally
4. To access specific programs of discounts and special conditions, raffles and prizes, follow-up of complaints and suggestions
5. To facilitate future reservations of services, so that you do not have to provide us with your personal data every time you contact us.
6. For sending additional information so that you can enjoy your reservation with the highest possible security and comfort, such as proof of reservation and payment, location sending and information on how to get, useful complementary information, among others.
7. For sending offers and promotions, Happy Holidays, Happy Birthday Vows, etc.... can cancel the consent given now in a quick, easy and at any time. To know how to do it send us an email to [RGPD@AguasdoGeres.pt](mailto:RGPD@AguasdoGeres.pt) or [RGPD@TermasdoGeres.pt](mailto:RGPD@TermasdoGeres.pt) or send us a letter to Empresa das Águas do Gerês, SA - Av. Manuel Francisco da Costa, 136, 4845-067 Gerês or Av Manuel Francisco da Costa, 125, 4845-067 Gerês
8. To be able to finalize your reservation, if you have not done so. We may contact you to remind you that you have not yet completed your reservation. We believe this service is beneficial to you as it allows you to continue your reservation quickly and easily.
9. For security and risk analysis purposes, including authentication of users and reservations on our websites.
10. Call monitoring. When you call our services, the telephone exchanges will record your telephone number so that we can contact you later. Sometimes the attendance at the reception does not allow us to be able to answer your call on time. You will then be contacted to find out how we can help you.
11. Finally, in certain cases, we may have to use your information to handle and resolve legal disputes, regulatory investigations, and compliance investigations to enforce the terms of service of the reservations service of Águas do Gerês, SA within the which is reasonably expected or to fulfill lawful requests from the authorities.

In order to process your personal data as described above, we make use of the following legal bases:

**Execution of a contract** - If you make a reservation or appointment of a service of ours or provided by us, we will use your information to enforce our obligation to complete and administer that reservation or appointment, in accordance with the agreement we enter into with you.

**Legitimate Interests** - We may use your information for our legitimate interests, such as providing you with the most appropriate services and products, in order to improve and promote our services and products, to fulfill obligations to deal with damages or responsible. We do this also for administrative reasons, legal purposes and for fraud detection.

For purposes 1 and 2 described above, we rely on the legal basis that the processing of personal data is necessary for the performance of the contract, in particular to manage its marking or reservation. If the necessary data is not

provided, we will not be able to give you the clarifications and information necessary to complete your reservation or purchase and we will not be able to provide the service you want. For purposes 3 to 10 we rely on our legitimate commercial interest in providing the services, preventing fraud and improving your experience. When we use your personal data for the purposes of our legitimate interests, we will always consider your rights and interests in the protection of your personal data in relation to our rights and interests. For purpose 11, we rely, where applicable, on the fulfillment of legal obligations (such as lawful requests from authorities). When necessary under the terms of the law in force we will obtain your consent prior to the processing of your personal data for direct marketing purposes.

## COOKIES STATEMENT

Whenever you use our online services, including all our applications, cookies and other monitoring technologies can be used in different ways. These technologies can be used directly by us or our business partners, including online booking platforms.

What are cookies? It is a small amount of data that a website hosts in the browser of your computer or mobile device. Primary cookies are associated by the entity that operates the domain where the cookie is hosted. The cookies on our website are of this type. There are persistent and session cookies. Session cookies only exist while your browser is running. Persistents have a longer duration and are not automatically deleted when you close the browser. They can last between the time of your visit to our sites and 2 years.

How are cookies used? They allow you to be recognized as the same user on different pages of a website, between websites, or when you use an application. The information we collect through cookies includes the IP address, device ID, pages viewed, browser type, browsing info, operating system, internet provider, time / date registration, if you have responded to an advertisement, the reference URL, features used or activities performed on the website / applications

### Type of cookies we use on our websites

Technical Cookies - used to provide advanced and user-friendly websites and applications to our visitors, tailored to your needs and desires. To do so, we use technical cookies that are required for our website or applications to function properly.

Functional cookies - used to remind us of your preferences and to help you use our website and applications more efficiently and effectively. These cookies will memorize your preferred currency, language, your searches and the services you viewed previously. These functional cookies are required for our website or applications to function properly, but they add functionality and improve your website experience.

Analytic cookies - used to get more information about how visitors use our website. Through these we can check what works or not, optimize and improve our applications and websites, understand the efficiency of promotional campaigns and communications and ensure that we continue to have relevant content. The data we collect may include pages you've visited, pages you've entered or left the website, the platform you've used, the emails you've opened that have resulted in some action on your part, and the date and time information.

This also means that we can use the data on how you interacted with the website, such as the number of times you clicked on a particular page, the activity of movements with your Mouse, and activities when scrolling through the page with the scroll bar. We use these cookies to find out how users interact with our website or applications.

Commercial cookies - we do not use this type of cookies

### What are your preferences?

To learn all about cookies and how to manage or delete them just visit [allaboutcookies.org](http://allaboutcookies.org) and the help section of your browser. You can choose the cookies you accept and those you refuse. If you choose not to accept some technical and / or functional cookies, you may not be able to use some functions of our website. We can review this situation about cookies if some things change in relation to cookies. In order to control the collection of

analytics data through Google Analytics for certain types of browsers, you can click the following browser Add-on link to de-activate Google Analytics (desktop only). In order to control data collection for analysis by Yandex.Metrica (a monitoring pixel managed by the Russian search engine YANDEX), users with the language configured in Russian, Ukrainian, or Turkish can click the following link [andandex.com](#). Yandex.Metrica is not valid for users of other languages. You can also choose not to participate in Yandex's personalized advertising. To do this, uncheck the "consider my interests"

If you have questions about this cookie statement, please send an email to [RGPD@AguasdoGeres.pt](mailto:RGPD@AguasdoGeres.pt)

This statement can be changed whenever necessary. We advise your viewing regularly to stay current.