

Privacy Policy

For Lucullumar - Sociedade Hoteleira e Turismo S.A., the privacy and security of guests' and other partners' personal data are of crucial importance.

This policy applies to all systems, people and processes that compose the information system of Lucullumar - Sociedade Hoteleira e Turismo S.A. The commitment to personal data security has been assumed by the board of Lucullumar - Sociedade Hoteleira e Turismo S.A. and it extends to all of the organisation's staff. Lucullumar - Sociedade Hoteleira e Turismo S.A. promotes the security of information and the protection in the treatment of personal data held by the institution and collected through traditional tour operators and tourist agencies and online operators (OTA), and the online booking centre (incorporated into the website).

In processing personal data, we respect your privacy and reiterate our commitment to implementing measures for compliance, in particular to ensure:

- a) lawful processing, supported by a legal basis, legitimate interest or consent of the data subject;
- b) that the processing is limited to the purpose for which the data was made available;
- c) that mechanisms exist for obtaining accuracy and entirety of the data made available by you;
- d) the minimisation of data required, requesting only data appropriate for the purpose;
- e) the limitation of data storage in accordance with the defined retention periods;
- f) the implementation of measures for the integrity and confidentiality of the information.

Lucullumar - Sociedade Hoteleira e Turismo S.A. has implemented procedures for the company to comply with the principles described above and the requirements of the new General Data Protection Regulation (GDPR) for existing information systems and to carry out prior impact assessment and implementation of privacy measures for new data processing to be carried out in the future.

To learn more about how we gather, use, share and protect the personal data we collect, please see the following sections of this Privacy Policy.

1. Lucullumar - Sociedade Hoteleira e Turismo S.A.

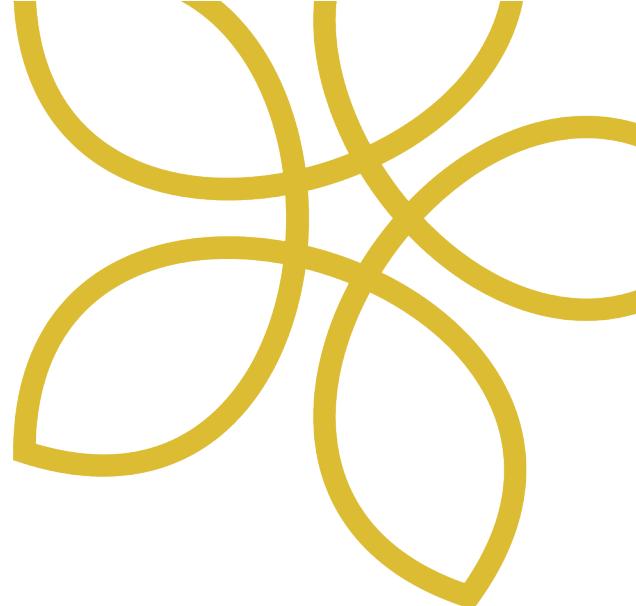
Lucullumar - Sociedade Hoteleira e Turismo S.A. manages a tourist resort, owned by the DERTOUR Hotels & Resorts GmbH / REWE Group, that combines three 4-star hotels (Sentido Galosol, Sentido Galomar and Alpino Atlântico Ayurveda Hotel) located in Caniço de Baixo, Madeira Island, Portugal providing accommodation for guests and related services, including a gym, food and beverage facilities, wellness and leisure activities.

This management entity has its headquarters at Rua D. Francisco Santana, 9125-031, Caniço, Madeira Island, Portugal, registered under the VAT identification number 511012551.

2. Categories of personal data processed by Lucullumar - Sociedade Hoteleira e Turismo S.A.

To carry out its duties and provide personalised service during your stay, Lucullumar Sociedade - Hoteleira e Turismo S.A., as the entity responsible for processing the personal data of its holders, collects the following categories of data:

- a) Identification data (e.g., name, passport number, photo, signature);



- b) Demographic data (e.g., gender, date of birth, nationality, city, postal code and country of residence);
- c) Contact details (e.g., address, mobile phone, email);
- d) Sensitive data, by customer option (e.g., dietary restrictions, personal preferences, health history);
- e) Financial data (e.g., credit card).

3. Purposes for which personal data may be processed, whether under a legal obligation, contractual relation or legitimate interest

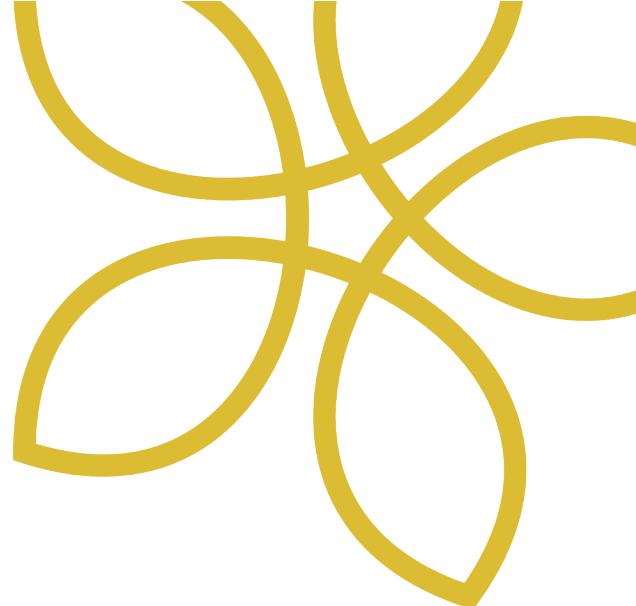
In the pursuit of its responsibilities, by virtue of a contractual relation, legal obligation and/or legitimate interest, Lucullumar - Sociedade Hoteleira e Turismo S.A. may process your personal data for the purposes described below for each type of entity.

Personal data will be kept for the period of time required by law according to the purposes for which they are intended, for the retention period contained in the obligatory periods for legitimate interest, regulation or legal imperative, with the application of information retention criteria that are appropriate for each treatment and in line with the legal and regulatory obligations to which Lucullumar - Sociedade Hoteleira e Turismo S.A. is subject.

The processing of personal data of children under the age of 13 is only carried out with the consent of the parents or legal guardians.

3.1. Guests

Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Booking management Collection management and credit recovery Promotion of a stay that suits the interests and safety of the guests.	Identification data Contact details Financial data Sensitive data	Pre-contractual diligence, execution of a contract and post-contractual diligence arising from the provision of the service.	Up to 120 days. The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.
Invoicing			Applicable legal term of 10 (ten) years The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.



Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Compliance with legal obligations, namely to supervisory, tax, judicial and police authorities, among others.	Identification data Contact details Financial data	Legal obligation. For the declaration, exercise or defence of rights in legal claims.	Legal deadline applicable at each moment for each legal obligation to be fulfilled. Until the expiration of the limitation period for the exercise of rights.
Security of people and goods through video surveillance system	Identification data	Legitimate interest	30 (thirty) days after image capture.

3.2. Customers (F&B, SPA, Events)

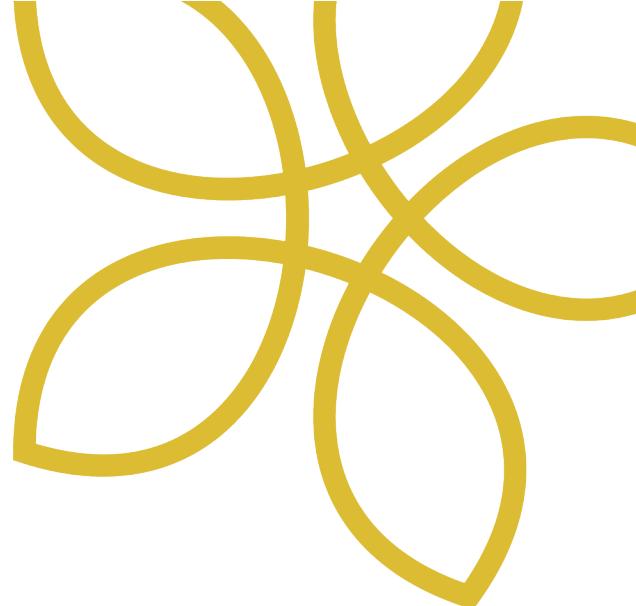
Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Booking management Collection management and credit recovery Promotion of a stay that suits the interests and safety of the customers.	Identification data Contact details Financial data Sensitive data	Pre-contractual diligence, execution of a contract and post-contractual diligence arising from the provision of the service.	120 (one hundred and twenty) days after termination of contract. The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.
Invoicing			Applicable legal term of 10 (ten) years The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.



Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Compliance with legal obligations, namely to supervisory, tax, judicial and police authorities, among others.	Identification data Contact details Financial data	Legal obligation. For the declaration, exercise or defence of rights in legal claims.	Legal deadline applicable at each moment for each legal obligation to be fulfilled. Until the expiration of the limitation period for the exercise of rights.
Security of people and goods through video surveillance system	Identification data	Legitimate interest	30 (thirty) days after image capture.

3.3. Customers (Bathing Access)

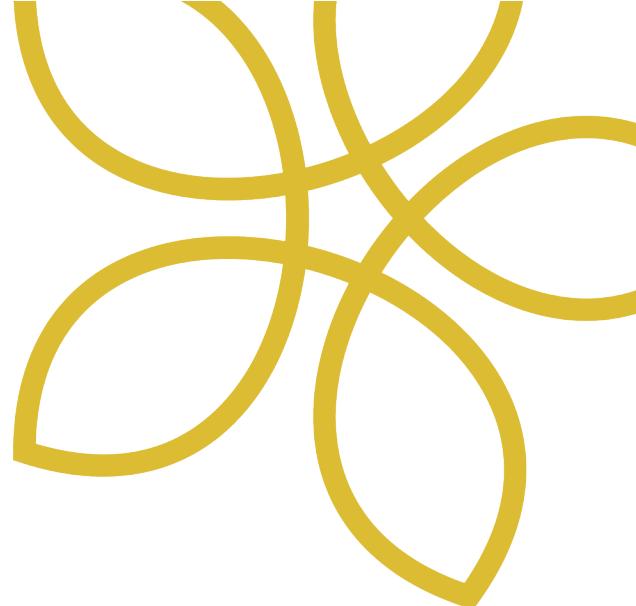
Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Access management Promotion of a service tailored to customers' interests and safety.	Identification data Contact details Financial data	Pre-contractual diligence, execution of a contract and post-contractual diligence arising from the provision of the service.	120 (one hundred and twenty) days after termination of contract. The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.
Invoicing			Applicable legal term of 10 (ten) years The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.
Security of people and goods through video surveillance system	Identification data	Legitimate interest	30 (thirty) days after image capture.



3.4. Gym members

- Members' management, e.g., name, tax identification number, date of birth, gender, and nationality
- Physical assessment, e.g., height and weight to calculate the body mass index (BMI) and health record
- Communication with members, e.g., address, town, postcode, mobile phone, email
- Payment of the monthly fee, e.g., IBAN

Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Booking management Collection management and credit recovery Promotion of a stay that suits the interests and safety of the gym members. Relevant communications to the members of the gym.	Identification data Contact details Financial data Sensitive data	Pre-contractual diligence, execution of a contract and post-contractual diligence arising from the provision of the service.	5 (five) years after termination of contract. The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.
Invoicing			Applicable legal term of 10 (ten) years The period may be longer to secure rights or obligations related to the contract or if there is a judicial process or legal obligation to fulfil.
Commercial and promotional activity for Galo Active customers.	Identification data Contact details	Legitimate interest	Until the data subject expresses their opposition to the processing (opt-out)
Compliance with legal obligations, namely to supervisory, tax, judicial and police authorities, among others.	Identification data Contact details Financial data	Legal obligation. For the declaration, exercise or defence of rights in legal claims.	Legal deadline applicable at each moment for each legal obligation to be fulfilled. Until the expiration of the limitation period for the exercise of rights.



Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Security of people and goods through video surveillance system	Identification data	Legitimate interest	30 (thirty) days after image capture.
Identification and personalized interaction with members within the scope of Galo Active activities.	Identification data	Legitimate interest	Until the data subject objects to the processing

3.5. Job applicants

Purpose of processing	Category of data	Category of data	Category of data
Recruitment Process or Voluntary Job Application: assessment of the candidate's profile and skills for the job position and retention for future offers.	Identification data Contact details Demographic data	Legitimate interest	Up to one (1) year from the date of data collection or until the data subject objects to the processing

4. Purposes for which personal data may be processed, with the data owner's explicit consent

Lucullumar - Sociedade Hoteleira e Turismo S.A. may, with your explicit consent, process your data to guarantee a personalised welcome during your stay, namely:

4.1. Guests

- The storage of your personal preferences (e.g., sports, leisure, and cultural preferences; dietary restrictions or preferences; and special physical needs).
- For commercial/marketing purposes and contacts related to commercial/marketing campaigns, such as sending the newsletter, by always having the option to unsubscribe, at any time.

Purpose of processing	Categories of data	Basis of lawfulness	Retention period
The storage of your personal preferences, to guarantee a personalised welcome during your stay: (e.g., sports, leisure, and cultural preferences; dietary restrictions or preferences; and special physical needs.)	Identification data Contact details Sensitive data	Explicit consent	Until revocation of consent by the data subject.



Purpose of processing	Categories of data	Basis of lawfulness	Retention period
For commercial and marketing purposes and contacts related to commercial and marketing campaigns.	Identification data Contact details	Explicit consent	Until revocation of consent by the data subject.

4.2. Members

Purpose of processing	Categories of data	Basis of lawfulness	Retention period
Conservation of your needs, to ensure a personalised welcome: (e.g., dietary restrictions or preferences; and special physical needs.)	Identification data Contact details Sensitive data	Explicit consent	Until revocation of consent by the data subject.
For commercial and marketing purposes and contacts related to commercial and marketing campaigns.	Identification data Contact details	Explicit consent	Until revocation of consent by the data subject.

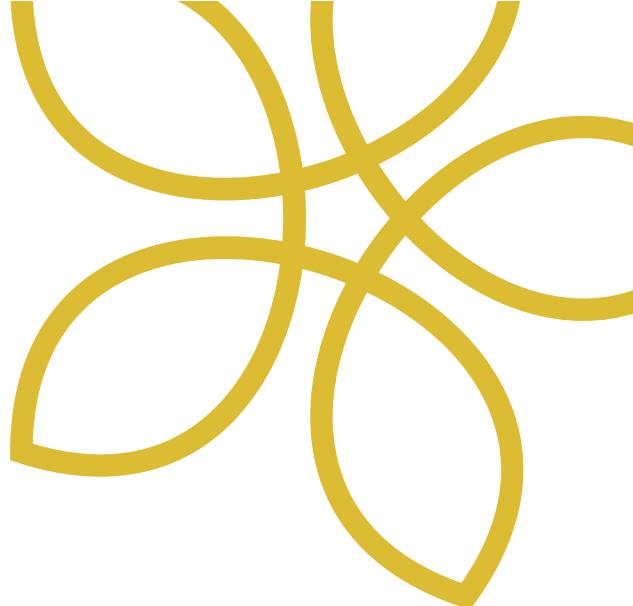
5. Purposes for which data may be processed via <https://www.galoresort.com/>

Through the website <https://www.galoresort.com/> for the convenience of its users, Lucullumar - Sociedade Hoteleira e Turismo S.A. offers the possibility of interaction and online reservations.

- Contact for general information (an online form indicating name, email, mobile phone, country and city).
- Newsletter subscription (name and email)
- Online reservations. Identification, contact, and financial data (name, email, phone, city, address, postal code, country and credit card).

6. Cookies Policy

To guarantee the normal functioning and personalisation of the website, cookies may be used. On each website a Cookies Policy will be presented, detailing the cookies used on that website, as well as the information about the cookies used, namely:



- Types of cookies;
- Purpose for which the cookies are used;
- The retention period of the data collected;
- How consent can be withdrawn.
- For all cookies that require consent, the user's consent to apply the cookies will first be obtained.
- The method for the user to withdraw consent to the cookies will be as easy as giving consent.

7. Transfer of personal data with other entities

In order for Lucullumar - Sociedade Hoteleira e Turismo S.A. to accomplish its mission and to provide you with a quality service, it may need to communicate your personal information, or give access to it, to other entities:

In such cases, Lucullumar - Sociedade Hoteleira e Turismo S.A. will only transmit your personal data to the following categories of recipients:

- a) Entities and authorities to whom the personal data must be communicated by virtue of a legal obligation (Foreigners and Borders Service - *Serviço de Estrangeiros e Fronteiras* (SEF) - and police authorities).
- b) Tax Authority
- c) Entity responsible for the reservations centre of the website <https://www.galoresort.com/>
- d) Other entities necessary for management and operation, namely: accounting, IT assistance, IT security, physical security and communications.

8. Rights of Data Subjects

Customers, as data subjects, enjoy the following rights:

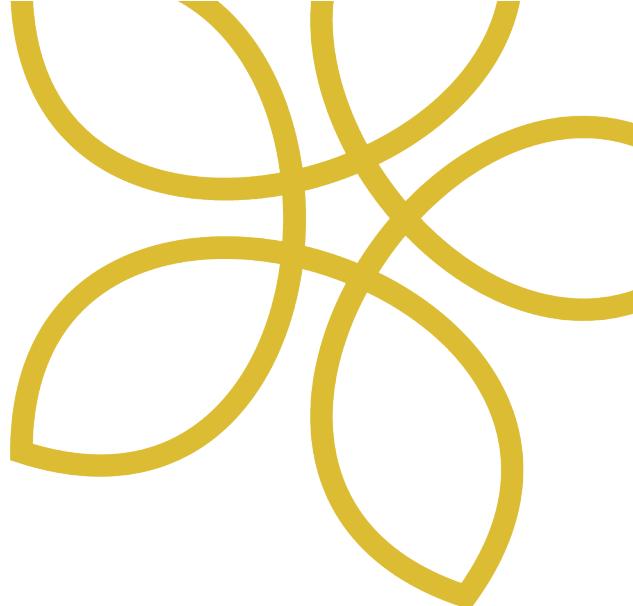
8.1. Right of access

Whenever you request it, you can obtain information about which of your personal data is being processed by Lucullumar Sociedade Hoteleira e Turismo SA. You can also access your personal data and obtain the following information:

- The purposes for which your personal data is processed;
- The categories of personal data that are processed;
- The entities to whom your personal data may be disclosed, including entities within the European Union or international organisations;
- The period for which your data will be kept, or, where that is not possible, the criteria for fixing that period;
- The rights you have regarding the processing of your personal data;
- If the personal data has not been collected from you, information on its origin and the type of data concerned.

8.2. Right to rectification

Whenever you consider that your personal data (provided by you) is incomplete, you can either ask to have it completed, or you can request its rectification if it is found to be incorrect. (e.g., address, tax number, contacts, personal preferences).



8.3. Right to erasure ('right to be forgotten')

In certain circumstances the data subject may request the erasure of his or her personal data. Lucullumar - Sociedade Hoteleira e Turismo S.A. will inform whether or not this right can be fulfilled given the existing retention obligations imposed by law or legitimate interest.

8.4. Right to restriction of processing

The right to restrict of processing of your personal data allows you to request the controller to restrict the scope of access and processing of your personal data or to suspend processing activities. You may request the restriction of the processing of your personal data in the following cases:

- If you contest the accuracy of your personal data, for a period of time that allows Lucullumar - Sociedade Hoteleira e Turismo S.A. to verify its accuracy;
- If Lucullumar - Sociedade Hoteleira e Turismo S.A. no longer needs the personal data for the purpose of processing them, but they are necessary for the establishment, exercise or defence of a right in a judicial process.

8.5 Right to data portability

You may ask Lucullumar - Sociedade Hoteleira e Turismo S.A. to deliver your personal data in a structured, commonly used and automatic reading format. You also have the right to request that Lucullumar - Sociedade Hoteleira e Turismo S.A. transfers this information to another party responsible for processing it, provided that this is technically possible.

The right to data portability only applies in the following cases:

- When the processing is based on explicit consent or the performance of a contract;
- Where the processing in question is carried out by automated means.

8.6 Right to object

You have the right to object to the processing of your personal data at any time, for reasons relating to your particular situation, and when the processing is carried out for purposes other than those for which the data has been collected, but which are compatible with them.

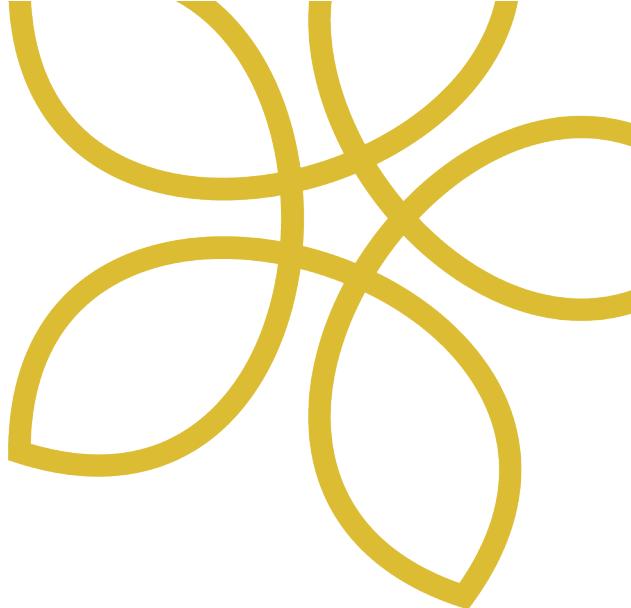
Lucullumar - Sociedade Hoteleira e Turismo S.A. will, in such cases, no longer process your personal data unless it has legitimate reasons for doing so and these override your interests.

The exercise of your right to object may result in the suspension or termination, in whole or in part, of the benefits associated with the purpose of the processing of the data in question.

You may also object to the processing of your data for direct marketing purposes.

8.7 Right to withdraw your consent

In cases where data processing is carried out based on your consent, you may withdraw consent at any time.



If you withdraw your consent, your personal data will no longer be processed, unless there are other grounds, such as legal and regulatory obligations or the public interest of Lucullumar - Sociedade Hoteleira e Turismo S.A., that justify such processing.

8.8 The right to present complaints to Lucullumar - Sociedade Hoteleira e Turismo S.A. or the supervisory authority

The exercise of your rights is free of charge, unless the request is manifestly unfounded or excessive, in which case a reasonable fee may be charged considering the associated costs.

A response to your requests should be provided within a maximum of 30 days, unless it is a particularly complex request, in which case this period may be longer.

Lucullumar - Sociedade Hoteleira e Turismo S.A. has appointed a Personal Data Protection Officer in accordance with Articles 37, 38 and 39 of the General Data Protection Regulation. You may contact the Data Protection Officer of Lucullumar - Sociedade Hoteleira e Turismo S.A. and exercise your rights through the following channel:

- E-mail: via e-mail, to the address dpo.galoresort@sentido.com

If you wish to lodge a complaint regarding matters relating to the processing of your personal data, you may do so with the Portuguese Data Protection Authority, the competent control authority in Portugal (www.cnpd.pt).

9. Changes to this policy

Lucullumar - Sociedade Hoteleira e Turismo S.A. may change this Privacy Policy at any time to reflect current privacy practices. When we make changes to this statement, we will update the revision date, keeping it at the document footer. We encourage you to read this Privacy Policy periodically so that you are aware of how Lucullumar - Sociedade Hoteleira e Turismo S.A. protects your information.