



Parques de Sintra

PRIVACY STATEMENT

Allocation of tickets to citizens residing in Portugal

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PARQUES DE SINTRA - MONTE DA LUA, S.A.

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SHAREHOLDERS: State – Directorate-General of Treasury and Finance | Instituto da Conservação da Natureza e Florestas. I.P. | Turismo de Portugal, I.P. | Sintra Town Council



Parques de Sintra

1. Preamble

Parques de Sintra – Monte da Lua, SA (hereinafter "Parques de Sintra"), legal person number 505 174 839, with its head office at Parque de Monserrate, 2710-405 Sintra, is the organisation responsible for managing the Park and Palace of Pena, the Monserrate Gardens and Palace, the Moorish Castle, the Convent of the Capuchos, the Chalet and Garden of the Countess of Edla, the National Palace of Sintra, the National Palace of Queluz and the Portuguese School of Equestrian Art. Parques de Sintra acts as Data Controller in accordance with the General Data Protection Regulation (GDPR) as regards access to the properties under its management and the various services it provides.

This privacy statement contains information on how personal data is collected and processed when Parques de Sintra grants free admission to the properties under its management to all citizens residing in Portugal.

For more information, we recommend that you consult the following documents, available on the Parques de Sintra website:

- Privacy Policy;
- General Conditions of Sale.

If you have any further questions, please contact us at dpo@parquesdesintra.pt.



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2. Access Control to Parks and Monuments

As of 2 January 2024, Parques de Sintra is offering free admission to the parks and monuments under its management to all Portuguese residents on Sundays and public holidays.

As part of this process, Parques de Sintra processes your personal data as it needs to confirm the identity of anyone purchasing admission tickets when they visit the Parks and Monuments. The basis for processing personal data is the performance of the contract with the data subject and the legitimate interest of Parques de Sintra, enabling it to identify those entering the Parks and Monuments and to ensure that they are in fact the people who purchased the tickets. By printing 23 characters of the name on the ticket, the identity of those wishing to enjoy free entry is anonymised, which thereby allows Parques de Sintra to safeguard the admission process for all Portuguese residents.

For this reason, your data will only be kept during the purchase process at the ticket office, until the ticket is issued, and will not be recorded in databases or shared with other organisations.

3. What are the grounds for processing personal data?

Under the terms of the General Data Protection Regulation, "processing of personal data" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means. Parques de Sintra may process your personal data on the following grounds:

- a) You give consent to the processing of your personal data for one or more specific purposes (Article 6(1)(a));
- b) If the processing is necessary for the performance of a contract to which the data subject is a party, or for pre-contractual steps at the request of the data subject (Article 6(1)(b));
- c) If the processing is necessary for the fulfilment of a legal obligation to which Parques de Sintra is subject (Article 6(1)(c), (d), (e));



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- d) Processing is necessary for the purposes of legitimate interests pursued by Parques de Sintra or by third parties, except where the data subject's interests or fundamental rights and freedoms take precedence and require the protection of their personal data, in particular if the data subject is a child (Article 6(1)(f)).

4. What are the purposes and grounds for processing personal data and how long is such data stored?

In order to grant free admission on Sundays and public holidays to Portuguese residents, Parques de Sintra processes your personal data in accordance with the General Data Protection Regulation and related legislation, for the purposes described below.

Purpose	Grounds	Storage Period
Issue of tickets to Portuguese residents and accreditation – Name printed on admission ticket	Implementation of the contract Legitimate interest	As long as the purchase process is open at the ticket office. Once this process is completed and the admission ticket has been issued, Parques de Sintra does not store any names.
Invoicing and fulfilment of tax and accounting obligations	Implementation of the contract Fulfilment of a legal obligation	10



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5. Rights of Data Subjects

Within the scope of the allocation of free tickets to Portuguese residents, the data subject has the right, insofar as the law allows, to object to the processing of their data and may exercise other rights. If you object to your personal data being processed, Parques de Sintra reserves the right not to issue you a free admission ticket. If you withdraw your consent, this does not affect the legality of any processing carried out up to that date.

The data subject is also legally entitled to be notified in the event of a breach of their personal data and may lodge a complaint with the appropriate authorities.

6. Right to complain to the supervisory authority

Data subjects have the right to lodge complaints with the competent supervisory authority regarding matters relating to the processing of their personal data. In Portugal, the competent supervisory authority is the National Data Protection Commission.

For more information, go to www.cnpd.pt.

7. Exercise of rights by data subject

You can exercise your rights by contacting Parques de Sintra at dpo@parquesdesintra.pt. Exercising your rights is free of charge, without prejudice to the fact that, whenever there are repeated, manifestly unfounded and repetitive requests, Parques de Sintra may demand payment of a reasonable fee, due to the administrative costs of providing the information or taking the measures requested, or even refuse to comply with the request.

When Parques de Sintra has reasonable doubts as to the identity of the natural person submitting the request, it may ask to be provided with the additional information necessary to confirm their identity.



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