



Parques de Sintra

PRIVACY POLICY

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Parques de Sintra

1. Purpose

Parques de Sintra – Monte da Lua, SA (hereinafter “Parques de Sintra”), legal person number 505 174 839, with headquarters at Parque de Monserrate, 2710-405 Sintra, is the entity responsible for the website www.parquesdesintra.pt (hereinafter, “the website”), and also acts as data controller in accordance with the General Data Protection Regulation (GDPR).

This document (hereinafter "the Privacy Policy") contains information on how personal data is collected and processed through the website. Users should also consult the following documents:

- Cookie Policy;
- General Conditions of Sale.

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

2. Processing of Personal Data

2.1. What is it?

In accordance with the General Data Protection Regulation, personal data is any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (in accordance with the definition mentioned in Article 4(1) of the GDPR).

Any processing of personal data must first be justified (as provided for in Articles 6, 9 and 10 of Regulation (EU) 2016/679). The data will be deleted at the end of the storage periods indicated, unless there is a pending dispute, in which case the data will be stored until a final judgment has been passed.

2.2. What are the grounds for processing?

Under the terms of the General Data Protection Regulation, "processing of personal data" means any operation



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or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The processing of personal data for a specific purpose must meet one of the legal grounds set out in the GDPR.

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));
- d. If 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)).

2.3. What are the reasons for processing?

Parques de Sintra processes your personal data in accordance with the General Data Protection Regulation and related legislation, for the purposes described below. The grounds justifying the processing of your personal data by Parques de Sintra are also set out below, along with the time limits for storing your data for each of the purposes.

2.3.1. Purchases via the website

The collection and processing of your personal data when you make a purchase via the website (name, address, tax identification number, contact details, date of visit, information on payment method) is necessary for the performance of the contract to be concluded between the purchaser and Parques de Sintra, and/or for carrying



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out pre-contractual steps at the request of the purchaser – in particular, for simulating and processing the purchase of admission tickets to the Parks and Monuments and associated services.

If the data is not made available, the requested services cannot be provided. The data submitted when purchasing/simulating the purchase of tickets via the website is processed by Parques de Sintra as follows:

Purpose	Grounds	Storage Period
Invoicing and fulfilment of tax and accounting obligations	Implementation of the contract Fulfilment of a legal obligation	10
Ticketing and delivery	Implementation of the contract	1 year from the purchase
Pre-contractual steps – Data obtained in LOG to complete the sale	Implementation of the contract Legitimate interest	As long as digital registration is active
Sending communications regarding the ticket/event for which tickets were purchased and related information	Implementation of the contract Legitimate interest	1 year from the purchase
Accreditation and access control	Legitimate interest	At the end of the visit/event



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Answering and clarifying questions (customer support, complaints, requests for information)	Implementation of the contract Legitimate interest	1 year after the issue or complaint has been settled
Fraud management and control (Including the collection of IP addresses by storing cookies on the user's device)	Legitimate interest Consent	6 months
Response to judicial and criminal investigations	Fulfilment of a legal obligation Legitimate interest	Legal deadline applicable to each obligation

2.3.2. Access Control to Parks and Monuments

Personal data (name, NIF Tax ID no., date and time of access to Parques de Sintra equipment) will also be used to confirm the identity of the online purchaser of access tickets when accessing the Parks and Monuments.

The basis for the processing of personal data is based on the implementation of the contract with the data subject and on the legitimate interest of Parques de Sintra, in order to identify the people who access the Parks and Monuments and to guarantee that their identity matches that of the purchasers of the tickets. For this purpose, your data will be kept for a period of six months after entering the Parques de Sintra equipment, notwithstanding cases in which longer retention periods apply under the terms of the legislation in force (for example, when there is a pending litigation for which the data is relevant).

2.3.3. Direct marketing (unsolicited communications) and segmentation

If you give your consent, Parques de Sintra will send you communications relating to events via the means mentioned below.

Additionally, in some cases, in order to determine which communications may be of interest to you, Parques de Sintra will analyse your consumption preferences by processing the following data and categories of personal data:

- a. Your ticket purchase and booking history;
- b. Your gender, age, district and locality.



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The only consequence of the segmentation carried out by Parques de Sintra is the personalisation of promotional campaigns and not any decision-making that could in any way influence you or produce significant legal effects on you.

Parques de Sintra will send personalised unsolicited communications, using profiling, and non-personalised communications, aimed at data subjects in general. In any case, these unsolicited communications for marketing purposes will be sent directly to the contacts you have provided through the following channels:

- a. Email;
- b. SMS (short message services), EMS (enhanced messaging services), MMS (multimedia messaging services) and similar mechanisms;

In view of the above, for direct marketing purposes, Parques de Sintra processes your data for the following purposes and on the following grounds:

Purpose	Grounds	Storage Period
Sending unsolicited communications and newsletters	Consent	1 year
Sending unsolicited communications following the purchase of a ticket on the website	Legitimate interest (“soft opt-in” or “opt-out”)	1 year from the last purchase, if there is no objection
Segmentation for sending personalised communications	Legitimate interest	1 year from the last purchase

For more information on exercising your right to object, please refer to point 2.6.1.6. of this Privacy Policy.

2.4. Security Measures

As the data controller responsible for processing personal data and information, Parques de Sintra implements and promotes appropriate and effective technical and organisational measures to comply with the principles of data protection, with the aim of ensuring confidentiality, integrity, availability and the ongoing resilience of its processing systems and services.



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The widespread use of computer systems for data processing does not exclude the possibility that, under certain circumstances, Parques de Sintra may use other means for data collection and processing. In any case, Parques de Sintra ensures administrative, technical and organisational measures are taken against potential misuse of data or unauthorised access.

It is the responsibility of users/data subjects to ensure that their mobile devices and computers are adequately protected against harmful software, computer viruses and "worms" (self-replicating programs whose main purpose is to install backdoors in computers). Data subjects should also adopt additional security measures, such as securely configuring the browser or using software to create a security barrier.

2.5. Recipients of personal data

In order for Parques de Sintra to fulfil all its duties and provide you with the best possible service, it may have to communicate your personal data to other entities or give them access to it.

The following categories of organisations are the only ones to which Parques de Sintra will communicate or give access to your personal data:

- a. Entities that provide services to Parques de Sintra in the area of:
 - IT support;
 - Marketing and publicity services;
 - Document management;
 - Legal and accounting support;
 - Logistical support;
 - Human resources support;
- b. Event promoters, to whom, in some cases, Parques de Sintra may transmit the personal data of data subjects who have made reservations or purchased tickets, so that they can send them more information about the events. Promoters will be identified when purchasing tickets or making bookings.
- c. Public authorities, such as tax authorities or courts.
- d. Payment service providers for completing transactions via the website.



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2.6. Exercise of rights by data subjects

2.6.1. Data subject rights

With regard to the processing of their personal data, the data subject has the following rights, under the terms of Articles 15 to 22 of the General Data Protection Regulation, as described below.

2.6.1.1. Right of access

The data subject has the right to obtain confirmation as to whether their personal data is processed by Parques de Sintra. They also have the right to access their personal data and to obtain the following additional information or clarifications:

- a. Reasons why their personal data is being processed;
- b. Types of personal data processed;
- c. Entities to whom their personal data may be transmitted, including entities located in countries outside the European Economic Area, in which case they will be informed of the guarantees applicable to the transfer of their data;
- d. The period for which their data will be stored or, if this is not possible, the criteria for establishing this period;
- e. Their rights in relation to the processing of their personal data;
- f. If the personal data has not been provided by them, information on where it came from;
- g. Whether there is automated individual decision-making, including profiling, and, if so, information on the logic behind such processing, as well as the significance and envisaged consequences of the processing.

2.6.1.2. Right to rectification

Whenever you consider that your personal data is incorrect or incomplete, you can request that it be rectified or completed. Your right to rectification will only apply to personal data that you have provided to Parques de Sintra (e.g. your user data) and not to personal data resulting from analyses carried out by Parques de Sintra (e.g. profiling).



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2.6.1.3. Right to erasure

In accordance with the law, you have the right to request the erasure of your personal data when all the situations set out in Article 17(1) of the GDPR are met, namely:

- a. The personal data ceases to be necessary for the purposes of its collection or processing;
- b. The data subject withdraws the consent on which the processing of the data is based pursuant to Article 6(1)(a) or Article 9(2)(a) and if there is no other legal basis for said processing;
- c. The data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate interests justifying the processing, or the data subject objects to the processing pursuant to Article 21(2);
- d. The personal data has been processed unlawfully;
- e. The personal data must be erased for the fulfilment of a legal obligation arising from any EU or Member State law to which the controller is subject;
- f. The personal data has been collected as part of an offer of information society services, as referred to in Article 8(1).

The right to erasure does not apply when processing is necessary for the following purposes:

- a. Exercise of freedom of expression and information;
- b. Compliance with a legal obligation that requires processing and that applies to Parques de Sintra;
- c. Reasons of public interest in the field of public health;
- d. Archival purposes in the public interest, scientific or historical research purposes or statistical purposes, to the extent that exercising the right to erasure would seriously jeopardise the achievement of the purposes of such processing; or
- e. Declaration, exercise or defence of a right in legal proceedings.

Although you can exercise your right to erasure at any time, the exercise of this right with regard to profiling for the purpose of sending personalised offers and promotions (direct marketing) may have already been compromised. Once you have exercised your right to erasure, your personal data will be anonymised within a



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maximum of 30 (thirty) days. The anonymisation of your personal data means that it is no longer possible to identify you, and it is impossible to relate the information to the respective data subject.

2.6.1.4. Right to restriction of processing

You can request that the processing of your personal data be restricted in the following cases:

- a. If the accuracy of the personal data is disputed, for a period of time that allows Parques de Sintra to verify its accuracy;
- b. If the processing is unlawful and you object to the erasure of your personal data and request the restriction of its processing instead;
- c. If Parques de Sintra no longer needs the personal data for processing purposes, but the data are necessary for the purposes of declaring, exercising or defending a right in legal proceedings; or
- d. If you have objected to the processing, until it is established that Parques de Sintra's legitimate interests prevail over your own.

2.6.1.5. Right to portability

You have the right to receive the personal data you have provided in a structured, commonly used and machine-readable format. You also have the right to ask Parques de Sintra to transmit this data to another data controller, provided this is technically possible.

2.6.1.6. Right to object

As per the law, you have the right to object to the processing of your personal data at any time, for reasons relating to your particular situation, in the following instances:

- a. When the processing is based on the legitimate interest of Parques de Sintra, regardless of whether Parques de Sintra can present compelling legitimate reasons for such processing which prevail over the interests, rights and freedoms of the data subject, or for the purposes of declaring, exercising or defending a right in legal proceedings; or



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- b. When the processing is carried out for purposes other than those for which the data was collected, but which are nevertheless consistent with them.
- c. You can therefore, at any time and without the need for justification, object to the processing of your data for direct marketing purposes, including profiling related to such marketing, without this compromising the lawfulness of the processing carried out on the basis of the consent previously given.

2.6.1.7. Right not to be subject to automated individual decision-making

Segmentation and profiling for personalised marketing purposes is carried out based on fully automated decisions with no human intervention, but has no legal or similarly significant effects on you, since the sole purpose of these decisions is to target campaigns and offers to your interests and needs.

2.6.1.8. Right to complain to the supervisory authority

You have the right to lodge complaints with the competent supervisory authority regarding matters relating to the processing of your personal data. In Portugal, the competent supervisory authority is the National Data Protection Commission. For more information, go to www.cnpd.pt.

2.6.2. How to exercise your rights

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.

3. Keep informed about the processing and protection of your personal data

The information in this document may change over time. We therefore advise you to consult the website www.parquesdesintra.pt, where this information will be kept up to date at all times, so that you can always find



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out how your data is being processed.

Whenever there are any changes to the way your personal data is processed, Parques de Sintra will inform you via the website or other commonly used communication channels. You can access other information relating to privacy, security measures and the protection of personal data and/or the operation of the records via the following documents:

- [Parques de Sintra Cookie Policy](#);
- [General Conditions of Sale](#).



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