

# PRIVACY POLICY

## Parques de Sintra



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## 1. Purpose

Parques de Sintra – Monte da Lua, SA (henceforth ‘Parques de Sintra’), legal entity number 505174839, based at Parque de Monserrate, 2710-405 Sintra, is the organisation responsible for the website [www.parquesdesintra.pt](http://www.parquesdesintra.pt) (henceforth ‘the website’) and for data processing according to the terms of the General Data Protection Regulation (GDPR).

This document (henceforth ‘Privacy Policy’) contains information about the way in which personal data is collected and processed through the website.

Users should also read the following documents:

- Cookies Policy;
- General Conditions of Sale.

If you have any further questions, you can contact us via the email address [dpo@parquesdesintra.pt](mailto:dpo@parquesdesintra.pt).

## 2. Processing of personal data

### 2.1. What is it?

According to the General Data Protection Regulation, personal data means 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, 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 (according to the definition set out in article 4 (1) of the GDPR.)

The processing of personal data shall be preceded by a condition that makes it legitimate (as set out in articles 6, 9 and 10 of the Regulation (EU2016/679)). As for the indicated periods for



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storing data, data shall be eliminated after that period, unless there is pending litigation, in which case the data will be stored until the final judgement has been reached.

## 2.2. What are the grounds for data processing?

In the terms of the General Data Protection Regulation, the 'processing of personal data' is any operation, or set of operations, 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 precisely in the GDPR. Parques de Sintra may process personal data on the following grounds:

- a. The data subject has given consent to the processing of personal data for one or more specific purposes (article 6 (1) (a));
- b. If processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract (article 6 (1) (b));
- c. If processing is necessary for compliance with a legal obligation to which Parques de Sintra is subject (article 6 (1) points (c), (d) and (e));
- d. If processing is necessary for the purposes of the legitimate interests pursued by Parques de Sintra or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, in particular where the data subject is a child (article 6 (1) (f)).

## 2.3. What are the purposes of data processing?

Parques de Sintra processes personal data according to the terms of the General Data Protection Regulation, and related legislation, for the purposes described below. Also identified



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below are the grounds that legitimise the processing of your personal data by Parques de Sintra, along with the periods of data storage for each of these purposes.

### 2.3.1. User registration

The website offers the option to create an account, with the following functions:

- a. Making it easier to buy or reserve tickets;
- b. Sending information about Parques de Sintra events to the data subject (if they have given consent in the terms of point 1.3.3 of this Privacy Policy);
- c. Possibility for the user to view their purchases and reservations while their account is active.

In order for users to be able to create an account on the website, they must supply the following data when they register:

- a. First and last name (relevant for personalised contact);
- b. Country (relevant for segmentation);
- c. District (relevant for segmentation);
- d. Telephone number (relevant for contact);
- e. Email address (relevant for contact);
- f. Password (created on registration, for access to the reserved area).

The data identified as required on the form must be provided to Parques de Sintra in order to conclude the registration or transaction.

In the context of registering on the website, Parques de Sintra processes personal data as follows:

Purpose	Grounds	Period of Storage
User registration	Execution of contract	1 year after cancellation of the account



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Fulfilment of legal obligation Legitimate interest
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### 2.3.2. Purchases through the website

In the context of buying tickets through the website, Parques de Sintra processes personal data as follows:

Purpose	Grounds	Period of Storage
Issue of invoice and fulfilment of tax and accounting obligations	Execution of contract Fulfilment of legal obligation	10 years
Issue of ticket and management of deliveries	Execution of contract	1 year after purchase
Sending communications relating to the ticket/event for which tickets were purchased and related information	Execution of contract Legitimate interest	1 year after purchase
Management of accreditation and control of access	Legitimate interest	The end of the visit/event
Response to and clarification of questions (customer support, complaints, information requests)	Execution of contract Legitimate interest	1 year after the closing of the question or complaint
Fraud management and control	Legitimate interest Consent	6 months



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(Includes collection of IP through the storage of cookies on the user's device)		
Response to notifications related to legal or criminal investigations	Fulfilment of legal obligation Legitimate interest	Legal period applicable to each obligation

### 2.3.3. Direct Marketing (unsolicited communications) and segmentation

With your consent, Parques de Sintra will send you communications relating to events, using the methods mentioned below.

In addition, in some cases, to determine the communications that might be of interest to you, Parques de Sintra will analyse your consumer preferences by processing the following data and categories of personal data.

- a. Your ticket-buying and reservation history;
- b. Your gender, age, district and location.

The segmentation carried out by Parques de Sintra is purely for the purpose of personalising promotional campaigns and not to carry out any decision-making that might in any way influence or produce significant legal effects concerning the data subject.

Parques de Sintra will send unsolicited personalised communications, using profiling, and non-personalised communications addressed to data subjects in general. In either case, these



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unsolicited communications, for marketing purposes, will be sent directly to contact details provided by you, via the following channels:

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

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

Purpose	Grounds	Period of Storage
Sending of unsolicited communications and newsletters	Consent	1 year
Sending unsolicited communications following the purchase of tickets on the website	Legitimate interest ('soft opt-in' or 'opt-out')	1 year from the last purchase, unless you opt out
Segmentation for the sending of personalised communications	Legitimate interest	1 year from the last purchase

For more information about exercising your right to opt out, see point 1.5.1.6 of this Privacy Policy.

## 2.4. Recipients of your personal data

For Parques de Sintra to fulfil all its obligations and provide the best service possible, it may have to communicate with or allow other entities to access to your personal data.



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Parques de Sintra will only communicate with or allow the following categories of entities access to your personal data:

- a. Entities who provide services to Parques de Sintra, in relation to:
  - a. IT support;
  - b. Marketing and publicity services;
  - c. Document management;
  - d. Legal and accounting support;
  - e. Logistical support;
  - f. Human resources support;
- b. Event promoters, to whom, in some cases, Parques de Sintra may disclose the personal data of data subjects who have made reservations or purchased tickets, so that they can send more information about the events. These promoters will be identified at the point of purchasing the tickets or making reservations.
- c. Public authorities, such as Taxation Authorities or Courts of Justice.
- d. Providers of payment services for the completion of transactions via the website.

## 2.5. Exercising of rights by data subjects

### 2.5.1. Data subject rights

In relation to the processing of your personal data, the data subject has the following rights, according to the terms of articles 15 to 22 of the General Data Protection Regulation, as described below.

#### 2.5.1.1. Right of access

The data subject shall have the right to obtain from Parques de Sintra confirmation as to whether or not their personal data are being processed. They also have the right to access their personal data, as well as to obtain the following information or additional clarifications:

- a. Reasons for the personal data processing;
- b. The categories of personal data concerned;



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- c. Entities to whom their personal data may have been disclosed, including entities located in countries outside the European Economic Area, and, in this case, details of the appropriate safeguards applied to the transfer of their data;
- d. Period for which their data will be stored or, if not possible, the criteria used to determine that period;
- e. Their rights in relation to the processing of their personal data;
- f. If the personal data has not been supplied by the data subject, information as to their source;
- g. The existence of automated decision-making, including profiling, and in this case, information about the logic involved, as well as the significance and envisaged consequences of this.

#### 2.5.1.2. Right to rectification

In any case when the data subject deems their personal data to be incorrect or incomplete, they can request the rectification or completion of that data.

2.5.1.2.1 Their right to rectification will only apply to personal data supplied to Parques de Sintra (e.g. their user data) and not to personal data resulting from analysis carried out by Parques de Sintra (e.g. profiling).

#### 2.5.1.3. Right to erasure

In legal terms, the data subject has the right to request the erasure of their personal data where one of the following grounds applies, as set out in article 17 (1) of the GDPR:

- a. The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b. The data subject withdraws consent on which the processing is based according to article 6 (1) (a), or Article 9 (2) (a), and where there is no other legal ground for the processing;
- c. The data subject objects to the processing pursuant to Article 21 (1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21 (2);
- d. The personal data have been unlawfully processed;



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- e. The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f. The personal data have been collected in relation to the offer of information society services referred to in Article 8 (1).

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

- a. Exercising the right of freedom of expression and information;
- b. Compliance with a legal obligation which requires processing and to which Parques de Sintra is subject;
- c. Reasons of public interest in the area of public health;
- d. Archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the right to erasure is likely to seriously impair the achievement of the objectives of that processing; or
- e. Establishment, exercise or defence of a right in a legal claim.

Although they may exercise, at any time, their right to erasure, the exercise of this right, in terms of the purpose of profiling with the intention of sending personalised offers and promotions (direct marketing), is undermined. Once the right to erasure has been exercised, the personal data will be anonymised within a period of no more than 30 (thirty) days. Anonymising personal data means making it impossible to identify or relate the information to the corresponding data subject.

#### 2.5.1.4. Right to restriction of processing

The data subject can obtain restriction of processing of their personal data where one of the following applies:

- a. The accuracy of the personal data is contested by the data subject, for a period enabling Parques de Sintra to verify its accuracy;



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- b. The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c. Parques de Sintra no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- d. The data subject has objected to processing, pending the verification whether the legitimate grounds of Parques de Sintra override those of the data subject.

#### 2.5.1.5. Right to data portability

The data subject shall have the right to receive the personal data which they have provided, in a structured, commonly used and machine readable format. They also have the right to ask Parques de Sintra to transmit those data to another controller, as long as this is technically possible.

#### 2.5.1.6. Right to object

In legal terms, the data subject shall have the right to object, on grounds relating to their particular situation, at any time, to the processing of their personal data, in the following situations:

- a. Where the processing is based on the legitimate interest of Parques de Sintra, notwithstanding Parques de Sintra's ability to demonstrate compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims; or
- b. Where the processing is carried out for purposes other than those for which the data were collected, but which are compatible with those purposes.
- c. The data subject can also object at any time and without need for justification to the processing of their data for direct marketing purposes, which includes profiling to the



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extent that it is related to such direct marketing, without it compromising the lawfulness of the processing carried out on the basis of previously given consent.

#### 2.5.1.7. Right not to be subject to automated individual decision-making

Segmentation and profiling for the purposes of personalised marketing is carried out on the basis of entirely automated decisions, without human intervention, but this will not produce legal effects concerning the data subject or similarly significant affect them, given that the only objective of these decisions is to direct campaigns and offers to their interests and needs.

#### 2.5.1.8. Right to lodge a complaint with a supervisory authority

The data subject has the right to lodge complaints with a competent supervisory authority, in relation to matters related to the processing of their personal data.

In Portugal, the competent supervisory authority is the Comissão Nacional de Proteção de Dados (National Data Protection Commission). For more information, go to [www.cnpd.pt](http://www.cnpd.pt)

## 2.6. How to exercise your rights

You can exercise your rights with Parques de Sintra using the email

address [dpo@parquesdesintra.pt](mailto:dpo@parquesdesintra.pt). It is free to exercise your rights, notwithstanding the fact that, if repeated requests are made that are repetitive and manifestly without foundation, Parques de Sintra can demand the payment of a reasonable fee to cover the administrative costs of providing information or taking the measures requested or even refusing to pursue the request.

When Parques de Sintra has reasonable doubt as to the identity of the natural person lodging the request, it can request the additional information necessary to confirm their identity.



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3. Stay up-to-date about the processing and protection of your personal data  
The information given in this document may be subject to alteration over time. For this reason, we recommend you consult the website [www.parquesdesintra.pt](http://www.parquesdesintra.pt), where this information will be constantly updated, so that you can keep tabs on the data processing we carry out.

Whenever changes are made in terms of the processing of your personal data, Parques de Sintra will inform you through the website or another commonly used channel of communication.

You can access further information related to privacy, security measures and personal data protection and/or the operation of the register:

- Parques de Sintra Cookies Policy
- General Conditions of Sale.



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