

PRIVACY AND PERSONAL DATA PROTECTION POLICY

1. INTRODUCTION

AHRESP - Associação da Hotelaria, Restauração e Similares de Portugal, hereinafter referred to as AHRESP, respects the privacy of companies that register for the TASTE Portugal Program via the website www.tasteportugal.com, and undertakes to protect personal data relating to them, from the outset in actions relating to the management of their internal processes, as well as in communication and information sharing actions that they decide to authorise.

AHRESP, being an association of legal entities - economic agents in the Tourism sector - is implementing the TASTE Portugal Program, and therefore needs to collect, store and process data related to the companies that enroll in the Program, which are essential for the implementation of this initiative, organizing them in databases. It does so in order to be able to conveniently implement the Program and the objectives to which it committed itself, and the companies that sign up do so freely in order to become members of the Network of Portuguese Restaurants in the World. In doing so, AHRESP informs and requests these companies' prior consent so that it may collect and use data for its specific actions, including those relating to contacts to be established with persons representing these same entities.

On the other hand, it should be emphasized that the collection, storage and processing of personal data regarding the companies enrolled in the Program (Data Holders) is done in strict compliance with the applicable legislation on personal data protection - Law 67/98 of 26 October (Personal Data Protection Law) and Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 - in order to ensure the confidentiality and security of the data provided.

This document explains what personal data is collected through interactions with businesses, how this data is used and the associated means of protection.

Detailed information on AHRESP's activity can be found at www.AHRESP.com.

2. ABOUT THE DATA COLLECTED

The data collected by AHRESP refers essentially to information about the companies and their activities. As the collection, storage and processing of data fall within the scope of the activities of the respective entities, and given the underlying business nature, it should be noted that they are related to the fact that we are legal persons under private law, and therefore, for the most part, do not fall within the specific scope of the RGPD.

• Type of data collected

o Of a general nature

In the context of action related to the administrative management of companies that enroll in the TASTE Portugal Program, the data collected are related to the need to register information about them, particularly in terms of their business name, including address, information about their website, as well as telephone contacts, email or other, and other identifying elements as a legal person. These data are freely provided by companies at the time of registration, by filling out the "Registration Form", which can be done entirely online through the site www.tasteportugal.com.

Of a personal and contact nature

Within the scope of AHRESP's administrative action, in terms of processes related to the management of the companies enrolled in the TASTE Portugal Program, the personal data collected is related to the need to obtain essential information for the implementation of the Program, namely the person to contact in each situation. In this scope, information related to the name and place of birth of the person in charge or owner of the company, as well as their telephone, email or other contacts are included.

On navigating digital platforms

AHRESP uses cookies associated with its digital platforms to ensure the best user experience for each user. It also monitors navigation and presence in its social networks.

The data collected not only improves the user experience of each user, but is also used to enhance the best service offer, whether made by AHRESP, AHRESP Services and/or third parties.

All platforms provide additional information about the specifics of the cookies associated with them, and each user must confirm their prior agreement about their use during their stay on and return to each platform.

How data is collected

The information collected is provided by themselves and on their own initiative during the registration process in the TASTE Portugal Program. The data are obtained by filling out the online form, at the time when interested parties express their desire to be part of this initiative.

What is the purpose of the data collected

The purpose of the data collected by AHRESP is to ensure the existence of useful information about each of the companies enrolled in the TASTE Portugal Program. In this sense, AHRESP understands that it is in the interest of these businesses to be contacted in order to inform them about the procedures for joining the Programme, as well as about actions to be taken by entities contracted by AHRESP to support the implementation of TASTE Portugal. It is therefore understood that contact by possible entities contracted by AHRESP, falls within this same context, and this can be done directly by these entities.

As a way of deepening the activity developed by companies that are members of TASTE Portugal, AHRESP carries out and participates in studies / analyses of the existing economic and social reality, with a view to producing and sharing knowledge. No data allowing for the identification of the company(ies) is ever disclosed in these actions, and the privacy of the company(ies) is preserved in any situation, except with their prior authorization.

3. SHARING OF COLLECTED DATA

The use of the data collected is made in the sole interest of the companies registered in the TASTE Portugal Program and the sector represented by AHRESP, and some information may be shared. About this possibility is given prior knowledge to these companies, which must previously authorize the respective sharing, although most of the shared data does not fall under the RGPD. Any personal data that may be shared refers exclusively to information on contact persons and/or persons with responsibilities in the companies.

4. PROTECTION MECHANISMS FOR DATA COLLECTED

AHRESP ensures the necessary privacy of the data of companies enrolled in the TASTE Portugal Program, preventing the misuse of such data for purposes other than those intended and by unauthorized persons, particularly in internal terms.

How data protection is ensured

The data protection of companies that enroll in the TASTE Portugal Program is ensured at different levels

PRIVACY AND PERSONAL DATA PROTECTION POLICY

At the level of work processes.

AHRESP safeguards exclusive access to certain data, in accordance with the nature and purpose of the data collected, depending on the objectives inherent to their use. Therefore, for the purposes of contact with companies enrolled in the TASTE Portugal Program, only AHRESP employees who need to contact them, using the existing means and information systems, and employees of the entities contracted by AHRESP to support the implementation of the Program, namely:

- IDTOUR - Unique Solutions, Lda, collective entity no. 508463130, headquartered at Campus Universitário de Santiago, Edifício 1, 3810-193 Aveiro
- COMER DEVAGAR, consultoria gastronómica, Lda., Tax n.º 514175451, with headquarters at Rua Cardoso Avelino, 136, 2º Esq. Trás, 5100-125 Lamego
- Ubiwhere, Lda., collective entity no. 508.245.567, with headquarters at Travessa do Senhor das Barrocas, 38, 3800-075 Aveiro
- EUROPEIA ID - Association for Research in Design, Marketing and Communication collective entity no. 506076547, headquartered at Rua Manuel Pinto de Azevedo 748, 4100-320 Porto
- WY CREATIVE, Marketing and Technology Services, S.A., SA, collective entity no. 505242850, headquartered at Avenida Marginal, Edifício Parque Oceano, 4º H, 2780-322 Oeiras

At the level of existing technologies and information systems

The AHRESP ensures that the technologies and information systems it has at its disposal guarantee the protection of the data of companies enrolled in the TASTE Portugal Program, in particular by requiring the entities contracted by AHRESP for support in implementing the Program (referred to above) to comply with the RGPD specifications, including the possibility of pseudonymization and encryption of data, confidentiality, integrity, resilience and proper functioning of these systems, as well as the restoration and accessibility to data in an appropriate time, according to physical or technical incidents and the adoption of regular monitoring procedures to ensure security in their treatment.

AHRESP requires compliance with the RGPD by its information technology suppliers, as well as by third parties, by establishing a commitment between the parties, assigning the associated responsibilities to each of the subscribers.

AHRESP also guarantees that there are no replicas of databases in other technologies and/or storage media, safeguarding the existence, with restricted access, of parts of the original databases, these being limited to enabling internal access to partial information for the purposes of analysis and/or support of specific activities.

Access Limitations

Access is limited, through user profiles specifically created for this purpose, with access limited by password, to the various employees assigned to specific activities in the scope of each of the technologies. In this sense, there are type profiles, such as

- Platform Administration - configures a complete level of use, being able to consult and modify all the existing information. In terms of access level, this profile is responsible for configuring other profiles for users with more restricted access, which must be done in conjunction with the person responsible for Information Systems and Technologies at AHRESP, and is also responsible for the Database before the Data Protection Officer (DPO - Data Protection Officer), in terms of the Privacy and Security of the underlying information;
- User with creation and deletion permissions - this profile corresponds to the user who can access all the information about the Database, including the creation and deletion of records, not being able to create users and/or intervene in the configuration of the application. Uses the application in all its features, being responsible to the Administrator of the platform in terms of reliability / accuracy of existing data, as well as the reserve and protection of the same, being forbidden to share with other unauthorized employees;
- User with consultation permissions - corresponds to the user profile that only accesses the database for consultation and use of the various application features. He is responsible to the Administrator of the platform under the reserve and protection of existing data, being forbidden to share with other unauthorized employees;

In addition to the aforementioned profiles for the use of information systems, and in situations where justified, part of the existing information in databases can be exported for restricted use in the different areas / competences of the AHRESP activity. When these uses are exclusively internal, they require partial replicas of the original databases to be registered with the person responsible for the Management of Information Systems and Technologies at AHRESP, who establishes the forms of access, permissions and limitations, in conjunction with the DPO. These uses will be limited in terms of time of use and forms of access, according to the specific purposes that justify their existence, depending, for this purpose, on the decision of the heads of each department, who establishes, with justification, these conditions. In these situations the department heads are the ones who, before the DPO, assume these responsibilities.

How long the data is kept

All personal data is kept for as long as deemed necessary for the purposes of maintaining the existing relationship with AHRESP, within the legal time limits imposed or until the company that enrolled in the TASTE Portugal Program exercises its right to erasure, which will be granted within the applicable legal limits.

5. ACCESS AND RIGHT TO DATA

The Data Holder is entitled to access his data and request changes thereon, among other rights which are described below.

- Access, rectification, cancellation and opposition

The AHRESP guarantees free access to existing information about each Data Subject, regardless of the underlying digital platform, and the Data Subject may request that this be rectified and/or cancelled under the terms referred to in 6, if he or she considers it inappropriate for the purposes in question.

- Data Portability

The Data Holder may request, under the terms referred to in 6, that the data be delivered to him in a structured, commonly used and machine-readable format, as well as request its portability, and may require that this be carried out by computerised means, provided that these are available for the purpose.

- Right to be forgotten

The Data Holder may request that their data be erased under the terms referred to in 6. Exceptions to this possibility are made for reasons of exercising freedom of expression and information, complying with legal obligations, performing functions in the public interest or for a public authority, for archiving purposes in the public interest, scientific or historical research, or for statistical purposes in certain situations, or for the purpose of declaring, exercising or defending a right in legal proceedings.

6. Data Protection Officer

PRIVACY AND PERSONAL PERSONAL DATA PROTECTION POLICY

José Miguel Silva is hereby appointed as AHRESP's Data Protection Officer, whose mission is to ensure compliance with the requirements of the RGPD and to guarantee all information to any Data Subject who so requests, as well as to respond to the various requests that he or she may submit.

7. Updating and contacts regarding the Privacy and Data Protection Policy

AHRESP reserves the right to update its Privacy and Personal Data Protection Policy at any time it deems it necessary to do so, without informing its members.

Any member may request information on AHRESP's Privacy and Data Protection Policy from the Data Protection Officer, through the following contacts: rgpd@ahresp.com; 213527060.

8. Law and Jurisdiction

The present general conditions are governed by Portuguese Law.

All disputes arising from the interpretation or execution of this agreement shall be settled by the District Court of Lisbon, with express waiver of any other.