VILLAGE
BY BOA

PRIVACY POLICY

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1. INTRODUCTION

This Privacy Policy describes the principles and guidelines adopted by **BOA HOSPITALITY, UNIPESSOAL LDA.**, sole shareholder private limited company, with registered office at Rua de Sant'Ana à Lapa, 21B D1, 1200-796 Lisbon, with share capital of € 100.00 (one hundred euros), with Portuguese legal person identification number 516815253 (hereinafter only "**BOA**") to ensure personal data subjects protection, establishing recommendations with regard to data subjects rights and to the processing and free movement of personal data.

In the course of its activity, BOA collects and processes personal data from several data subjects, including, natural people which hire (or are interested in hiring) accommodation services (jointly referred, for the purposes of this policy, as "data subjects").

2. CONTROLLER

The "Controller", i.e., the person who determines the purposes and the means of the processing of personal data of data subjects, is BOA.

3. PERSONAL DATA CATEGORIES

BOA may process personal data set out in the following categories:

- Identification Data, such as, gender, profession, name, date of birth or age, citizen card number, tax identification number, photograph, foreign tax identification number if applicable, passport number and validity;
- Contact Data, such as, address, e-mail address, telephone and mobile contacts, among others;
- Financial data, such as, IBAN, credit card details, among others.

4. COLLECTION OF PERSONAL DATA

Personal data processed by BOA are data provided from data subjects at the time of their first contact and while data subjects maintain a contractual relationship with BOA.

BOA collects personal data at various times and through several communication channels, including telephone, e-mail, forms on BOA's website (www.villagebyboa.com) and paper forms.

5. Personal Data Processing Purposes, Processing Legal Basis and Storage Periods

BOA processes personal data from data subjects for several reasons, justified by data protection laws applicable in the EU and in Portugal. BOA processes the personal data for the following purposes and according to the following lawful basis:

Data Categories	Purposes	Lawful Basis
Identification Data	Contracts enforcement celebrated between BOA and the data subjects, for the purposes of providing accommodation services	• Contract performance 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 • Compliance with legal obligations to which BOA is subject
Contact Data		• Contract performance 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 • Compliance with legal obligations to which BOA is subject
	Marketing and communication, events and news about related information	Explicit and unambiguous consent from data subject
Financial data	Contracts enforcement celebrated between BOA and the data subjects, for the purposes of providing accommodation services	• Contract performance 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 • Compliance with legal obligations to which BOA is subject

Data subjects personal data are stored throughout the duration of the relation contractually established with BOA and until 10 (ten) years from the end of that relationship; in some situations the storage period may be longer, in which cases this extension will be legally justified and sustained. This period was defined in accordance with data protection applicable laws and civil and commercial contracting applicable laws, and in order to deal with the eventuality of BOA have the need to provide evidence in any legal claim or potential legal claim among itself and data subjects.

In case of personal data processing for marketing purposes and commercial communication, this data processing shall occur only with the data subject's consent, given at the time of the personal data collection. In case of consent, the data subject may receive marketing communications through e-mail, post, telephone and SMS.

The consent for processing of personal data for marketing purposes and commercial communication may be withdrawn at any time, although the withdrawal of consent shall not affect the lawfulness of processing based on previous consent nor the subsequent processing of the same data, based on another legal basis, such as, for example, 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 and compliance with legal obligations to which BOA is subject.

In case of intending to withdraw its consent, data subject can contact us to the contacts indicated in this policy.

6. AUTOMATED DECISION-MAKING ("PROFILING")

BOA does not use technologies to decision-making exclusively based on automated processing of data subject´s data.

7. CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

BOA may share personal data of data subjects with BOA service provider entities. For instance, BOA may share personal data of data subjects with entities providing services to BOA in relation to the management of reservations, orders, and customer relationship. In this scenario, all the processing conducted by those entities shall occur on behalf of and according to BOA´s instructions. In the data transfers of personal data to its service providers, BOA assures that the processor entity is bind by an outsourcing agreement that sets out the obligations of personal data processing in compliance with protection of personal data legislation.

BOA may also share the personal data of the data subjects with third entities *(i)* due to requirement or legal notice to this effect, as long as dully justified and legally sustained; *(ii)* by request from a public authority, as long as dully justified and legally sustained; *(iii)* following a request expressly formulated by data subjects in relation to the data to which they are entitled of, in exercising their rights, in particular, the right to portability.

8. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

BOA does not transfer the personal data of data subjects to entities based out of the European Union.

9. RIGHTS OF THE DATA SUBJECTS

As an expression of our commitment for ensuring the privacy of data subjects, BOA assures, in compliance with the applicable national and European Union legislation, a wide range of rights which may be exercised under the following terms:

- **Right of Access**

The data subjects may, at all times, contact BOA and require information as to personal data concerning him or her that are being processed and, in such case, of being informed regarding to: *(i)* the categories of personal data concerned; *(ii)* the purposes of the processing of their data; *(iii)* the period for which the data will be stored or the criteria used to determine that period; *(iv)* the rights they are entitled to and how to exercise them; *(v)* the data source relating to them; *(vi)* the existence of automated decision-making, including profiling.

BOA may only provide information from data subjects and not personal data from other people. Furthermore, if the access may affect negatively the rights of other person, it may not be possible to provide them.

If requested by data subject, BOA will send a copy of his/her personal data in processing phase, in electronic format. If further copies are requested, BOA reserves the right to charge a fee equivalent to the administrative costs incurred to satisfy the request.

- **Right to Erasure**

Also known as "right to be forgotten", enables the data subject to request the elimination or removal of his/her personal data where there is no imperative reason for BOA to continue to use them. The right to erasure is not absolute because BOA may have the right or the obligation to retain the information, as is the case, for example, when is subject to a legal obligation or have another valid reason to retain such data.

- **Right to Rectification**

Wherever verified that the personal data processed are out-of-date, incomplete or inaccurate, the data subject might request before BOA its rectification within the shortest possible time.

- **Right to Data Portability**

The data subject also have the rights to: *(i)* receive from BOA personal data concerning him or her, in a commonly used and machine-readable format; *(ii)* to transmit those data to third parties unrelated to BOA, under him/her exclusive responsibility; and/or *(iii)* to request BOA to transmit those data to third parties. The right to data portability only covers the data to which the data subject has consented to processing, data related to a contract to which the data subject is party or if the processing is performed by automatic means.

BOA reserves the right to refuse to data portability requests where these affect the rights and freedoms of others, or conflict with any legal requirement.

- **Right to restriction of processing**

In certain situations, the data subject has the right to "block" or to remove the continued using of data subjects information. When processing is restricted, BOA continues to be able to store data subject's information, although cannot continue to use them.

The data subject may request restriction of processing for an indefinite period, when intending to suspend the processing, but storage his/her data. This situation may occur when:

(i) data subject contests the accuracy of the personal data, being the processing limited for a period enabling BOA to verify the accuracy of the personal data, or

(ii) data subject waits for a response to a restriction of a processing request.

Where processing has been restricted, personal data shall only be processed with the data subject's consent, except for specific processing established by law. BOA assures that the data subject who has requested the restriction of his/her data is informed before the restriction of processing is lifted. BOA reserves the right to restrict of processing data from data subjects when no longer needs it, committing to storage the data for the storage period pre-established. BOA assures that the data subject who has requested his/her data restriction is informed prior to the respective annulment.

- **Right to object**

BOA ensures the necessary means so that the data subject might be able to object to certain processing of personal data for certain purposes, notwithstanding the directives or laws in force.

Data subject shall have the right to object in the following circumstances:

(i) On the grounds relating to his or to her particular situation, at any time, to processing of personal data concerning him or her based on legitimate interests. However, BOA shall continue to process data from the data subject if it is able to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or in case of need the personal data to establish, exercise or defense of legal claims;

(ii) Shall object at any time to processing of their personal data for direct marketing purposes (including profiling related to such direct marketing).

- **Right to Complaint**

Notwithstanding BOA's adoption of best practices in relation to the protection of personal data, data subjects are granted the right to lodge a complaint before "*Comissão Nacional de Proteção de Dados*" (https://www.cnpd.pt) in relation to the processing of personal data performed by BOA, through any of the channels permitted by the Supervisory Authority.

10. PRIVACY POLICY AMENDMENT

BOA might amend or update this Privacy Policy due to new regulatory or legal requirements, as well as following the improvements made in quality of service and the development of our commitment in what regards to personal data protection. Any amendments to this Privacy Policy will announced in the various BOA's communication channels.