**Privacy Policy**

The protection of privacy and personal data is a core commitment of Prime Emotions Unipessoal Ld.ª (hereinafter "Prime Emotions") to its customers, partners and its users. As such, we are committed to protecting the personal data (hereinafter "data") that you may share with us in accordance with current personal data protection legislation, and in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, General Data Protection Regulation - “[GDPR](https://eur-lex.europa.eu/legal-content/PT/TXT/?uri=celex%3A32016R0679)”.

This Privacy Policy is intended to explain how Prime Emotions treats your data and your rights as a data subject.

In this Privacy Policy we explain what personal data we collect, for what purposes we may use it, with whom we share it, how long we keep it, as well as ways to contact us and exercise your rights.

**Who We Are**

Prime Emotions is a Destination Management Company, registered in Portugal under VAT 516491334 and RNAVT 9766. You can contact us through:

* E-mail: info@prime-emotions.com
* Adress: Rua Afonso III, nº 59, 8135-112 Almancil
* Web: [www.prime-emotions.com](http://www.prime-emotions.com)

**Person Responsible for Treatment and Data Protection Officer**

In accordance with the GDPR, PRIME EMOTIONS acts as the entity in charge of the treatment of your data. For any clarification related to this Privacy Policy or to the treatment of your data, you may contact PRIME EMOTIONS, through the email indicated.

**How we collect your personal data**

Whenever we have your express and direct consent, in writing, orally or by validating an option (selectable in an unequivocal manner) and if this consent is free, informed, specific and unequivocal, PRIME EMOTIONS may collect the personal data of its clients, users and partners by telephone, e-mail or in person.

To access PRIME EMOTIONS' website it is not necessary to register. However, when you access our website and use the "Contact Us" function, to send us your requests for information, you will be asked to provide the following personal information: Name, Email and Telephone.

We collect the information strictly necessary to process your contact, send a reply and provide you with a more personalized service.

We do not automatically log personal information, including your IP address. The registration of IP addresses that consult the Site is only for the purpose of statistical traffic analysis. The data provided will not be transferred to third parties without your prior consent.

Any data that you make available to PRIME EMOTIONS will be understood to have been obtained, treated and transmitted in strict compliance with the requirements established in the GDPR and the legislation in force.

**What personal information is collected**

In addition to the collection of your name, telephone contact or e-mail address, PRIME EMOTIONS will process other categories of data, directly related to the management of the contractual relationship, legal obligations, legal requirements and the legitimate interest of Prime Emotions, such as:

* Booking or purchasing services: There is a set of data that must necessarily be collected in order for Prime Emotions to organise and provide the requested service (including sending the booking confirmation and travel documents), as well as to manage any complaints related to the booking or purchase of services, such as, full name, date of birth, civil and tax identification document details, nationality, address, mobile or telephone number, email address, gender, data concerning travel preferences, special occasions and special requests;
* Management and administration: data collected to enable Prime Emotions to fulfil its accounting/tax, legal and administrative obligations, typically including your name, address, tax identification number and bank details;
* Sensitive data that is essential to ensure the quality of our service (dietary restrictions and physical limitations).
* Underage data is collected and processed with the consent of parents or a legal guardian. With regard to this data, the parents or legal guardian can exercise the rights that the GDPR grants to data subjects.

We do not collect sensitive data categories relating to race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning your health, life and sexual orientation and criminal record.

Our website may contain links to other pages, platforms, social networks, websites. The privacy notice only applies to our website, PRIME EMOTIONS is not responsible for the collection and processing of data carried out by these websites. It is your responsibility to read the privacy policies made available there before providing your Personal Data.

**What do we use your personal data for**

PRIME EMOTIONS will process your personal data for the following purposes:

* To respond to requests and information, related to the offer of tourism products or other issues requested by the customer;
* To manage and streamline relations with the client and ensure the supply of the services requested;
* Marketing, by publicising our services, sending useful and commercial information and promotions;
* Analysis of consumer profiles;
* Adaptation and development of new services or products
* Managing complaints through online surveys, e-mail or by telephone consultation with a view to improving the experience of the end consumer.
* Processing the personal data provided, namely through the "WORK WITH US" form, for the purposes of recruitment, selection and curricular analysis or other purposes inherent to Human Resources management.

**To whom do we communicate your data**

We will not share your personal data with third parties. This occurs only and when strictly necessary for the fulfillment of the contract for the provision of services, concluded between you and PRIME EMOTIONS and only for the purpose of the correct provision of each requested service (in this case, the data will only be used for this specific purpose).

In the case of PRIME EMOTIONS, the provision of services or information may involve the use of third party services, subcontractors of PRIME EMOTIONS (hotels, rent-a-car companies, tour guides, transport agencies and other similar) whose data processing must also guarantee a legal and transparent processing, in accordance with the regulations of the European Data Protection Legislation, governed by the contract signed with PRIME EMOTIONS.

Depending on the destination, Prime Emotions may need to transfer your data to service providers within or outside the European Union (provided that such a transfer is essential for the execution/provision of the service). Any transfer of personal data to a third country will only take place in the framework of the fulfilment of legal obligations or provided that compliance with the applicable EU and national legal rules is ensured.

**How long do we keep your data?**

Irrespective of the data retention rules, to which we are obliged by the Portuguese State, we shall retain your personal data only for the period of time necessary for the fulfilment of the purposes which motivated its collection, fulfilment of other legal impositions or, depending on what is applicable, until you exercise your right of opposition, right to be forgotten or withdraw your consent.

**Personal Data Security Measures**

PRIME EMOTIONS has implemented the logical, physical, organizational and security measures which are appropriate, necessary and sufficient to protect your personal data, such as firewalls, intrusion detection systems, backups and encryption, avoiding their loss, improper use, alteration or destruction, guaranteeing their integrity, availability and confidentiality, unauthorized access or any other form of accidental or illicit treatment. All employees are required to keep personal data confidential. Only authorised personnel have access to data and only those necessary to perform their duties.

**What are the procedures in case of a data breach?**

If personal data stored by us is subject to a data breach, we will inform and alert the users concerned by email within 72 hours.

**Rights of the data subject**

Please be advised that, as a data subject, you may exercise the following rights:

* Right of access to your personal data, to know what data is being processed and what processing is being carried out,
* Right of rectification of any inaccurate or outdated personal data,
* Right to erase your personal data (right to be forgotten),
* Right to object, i.e. to request that your personal data not be processed,
* Right to withdraw your consent at any time, where this was the legal ground for the processing of your data,
* Right to request the limitation of the processing of their personal data in the following cases
* Right of portability, i.e. to receive the personal data you have made available

To exercise these rights, you can send a written request, with a copy of your identification document, to our email address info@prime-emotions.com and to exercise your rights, you must indicate in your request your email address, your full name and the right you are exercising. After sending the request with the necessary information, Prime Emotions will respond within a period of one to two months, taking into account the complexity and number of requests.

If you consider that any violation of the data protection legislation in force has been committed with regard to the processing of your personal data, you have the right to lodge a complaint with a supervisory authority, whose role in Portugal is the National Commission for Data Protection.

**Changes to the Privacy Policy**

PRIME EMOTIONS reserves the right to update or modify the present Privacy Policy at any time, without prior notice, in order to adapt it to legislative changes, such changes being published on the website.

**Supervisory Authority**

If you consider that there is a problem with the way Prime Emotions is handling your data, you have the right to lodge a complaint with the national supervisory authority (Comissão Nacional de Proteção de Dados - CNPD) at [www.cnpd.pt](http://www.cnpd.pt)..

**Information on the use of Cookies**

Please refer to our Cookie Policy, on our website, to find out how you can manage your cookie settings and for detailed information about the cookies that Prime Emotions uses, and the purposes of their use. For more information on the Cookie Policy, please **click here**.

**Terms of use of the Website**

In the preparation of PRIME EMOTIONS' Website, every effort has been made to ensure that the information contained in it is correct, precise and up to date, although errors are not guaranteed. The material available on this Website, in text and image, is the property of PRIME EMOTIONS or third parties; its use is made with the authorization of the authors.

By consulting the information made available, the user expressly accepts the terms and conditions described below:

* All information is subject to updates and/or changes without prior notification;
* PRIME EMOTIONS reserves the right to revise the terms of use at any time and without prior notification;
* You should make yourself aware of the most recent terms of use by regularly visiting this page - the latest version of the terms of use is binding. Use of this website after such changes constitutes your acceptance;
* You may not modify, reproduce, publicly display or broadcast, publicly or commercially use the materials or content of this website.
* The materials and information available on this website are protected by copyright and any unauthorised use may violate legal or regulatory provisions relating to copyright, trademarks or other rights.
* In order to offer added value to our visitors, PRIME EMOTIONS may provide links to websites operated by third parties. However, we do not control these sites, even if they are partners or associates, which have privacy and data collection practices that are different and independent from ours. Such websites are only made available for the convenience of the users and their access is therefore at their own risk. Nevertheless, PRIME EMOTIONS tries to protect the integrity of its website and of the links made available on it, and therefore requests any feedback, not only on its own website, but also on the links made available (including when a specific link does not work).

**Comments**

When visitors leave comments on the site, the data in the comment form as well as the IP address and browser user agent are stored to help with spam detection.

An anonymous string created from your email address (also called a hash) may be sent to the Gravatar service to verify that you are using it. The Gravatar service privacy policy is available here: <https://automattic.com/privacy/>. After your comment is approved, your profile picture is visible to the public in the context of your comment.