

The confidentiality of the personal information of our clients is fundamental and a commitment of MBD Gestão de Investimentos Hoteleiros Lda.

## 1. COLLECTION AND HANDLING OF USER DATA

There are many circumstances in which we request personal data of a user ("User") from the website <https://thehouseofsandeman.pt> ("Site"), meaning information that will allow for identifying the user or his/her contact details ("Personal Data"): when you place a reservation, when you subscribe a newsletter, when you contact us to request a stay or a event for your company, or when you send as a spontaneous or requested membership form. Collected and handled personal data consists of information regarding name, e-mail address, gender, date of birth, address, telephone number, credit card information and ID number.

Therefore, the entity responsible for the collection of Personal Data is:

- i) whenever the collection of Personal Data is related to a reservation, MBD Gestão de Investimentos Hoteleiros Lda, a company with its registered office at Rua São Pedro de Alcântara 81, 1250-238 Lisboa, registered in the Commercial Registry of Lisbon, under registration and taxpayer number 509661840, with a share capital of 5000 euros.
- ii) in every situation of collection of Personal Data that has not been described above, MBD Gestão de Investimentos Hoteleiros Lda Management.

## 2. USE AND PURPOSES OF THE HANDLING OF USER DATA

Personal Data is used only to confirm reservations, to help simplify the reservation process when you are a registered customer, to inform you of Grupo MBD Gestão de Investimentos Hoteleiros Lda promotions and information (if you subscribe our newsletter), and for statistical marketing analysis for exclusive use by Grupo MBD Gestão de Investimentos Hoteleiros Lda.

If you are a registered customer at our Site, you can change your Personal Data whenever you wish to, by typing your Username and Password.

We also identify technical information of your computer when you visit pages of our Site, such as the IP (Internet Protocol), the operative systems and the type of browser ("Usage Information"). We use this information to improve the quality of your visit to our Site, and we will not provide this information to entities external to MBD Gestão de Investimentos Hoteleiros Lda without your prior consent.

The Usage Information and Personal Data are jointly designated in the present Privacy Policy as "User Data".

The User Data collected by MBD Gestão de Investimentos Hoteleiros Lda is not shared with third parties without your prior consent, except for disclosures set forth in this Privacy Policy which you expressly consent by accepting the Privacy Policy.

MBD Gestão de Investimentos Hoteleiros Lda holds the rights to transfer User Data, in case of sale or transmission of part or the entire company or respective shares, and also between entities that belong to MBD Gestão de Investimentos Hoteleiros Lda. In case User Data is transmitted to third parties, we will make a considerable effort to guarantee that the receiving entity respects the Privacy Policy.

## 3. ACCESS TO PERSONAL DATA

MBD Gestão de Investimentos Hoteleiros Lda guarantees the means that allow for the User's access to their Personal Data. In case you intend to access your Personal Data, you should contact Grupo MBD Gestão de Investimentos Hoteleiros Lda according to the terms set forth below.

#### 4. CORRECTION OF PERSONAL DATA

The User has the right to request, at any given moment, the correction of his/her Personal Data, through sending an email to [reservations@thecollective.pt](mailto:reservations@thecollective.pt) and according to the respective terms of the Privacy Policy.

#### 5. SAFETY OF USER DATA

In order to guarantee the safety of User Data and maximum confidentiality, we handle supplied information in a completely confidential manner, according to our internal safety and confidentiality policies and procedures.

Whenever we require credit card information, this communication is made through a SSL (Secured Sockets Layer) secure line, when you are using SSL enabled browsers such as Microsoft Internet Explorer or Netscape Navigator.

We will also use SSL in all pages where personal information is requested, which means that your information will be sent through the internet in an encrypted manner. You can verify that you are in secure mode when you see a lock icon or key in the right or left lower corner of your screen. Additionally, you can see that the first letters of the site's url will be "https", indicating that your accessing a secured server.

However, the User Data may circulate on the internet without any safety conditions, and may be visualized and/or utilized by non-authorized third-parties for that effect. On those circumstances, MBD Gestão de Investimentos Hoteleiros Lda Travels and MBD Gestão de Investimentos Hoteleiros Lda Management (according to the case) are not responsible for the theft, destruction or dissemination of the User Data.

#### 6. USE OF COOKIES

When you visit our Site, a small text file (Cookie) is created and recorded in your computer hard-drive. By recognizing you, this file will allow for easiness and quickness of access, along with the customization of the Site according to your preferences.

Most browsers automatically accept these files (Cookies). However, you can erase them or automatically define them as blocked. In the "Help" menu of your browser you will find how to make these configurations. However, in case you do not allow the use of cookies, there may be some functionalities you will not be able to use.

#### 7. CHANGES TO PRIVACY POLICY

MBD Gestão de Investimentos Hoteleiros Lda reserves the right to change the Privacy Policy at all times. In case the Privacy Policy is changed, the date of the last change, available on the top of this page is also updated. In case there is a substantial change, a warning may be placed in our Site.

#### 8. CONTACT AND RIGHTS OF WITHDRAWAL

In case you intend to (i) place questions/complaints related with the Privacy Policy; (ii) rectify your Personal Data; (iii) stop receiving commercial mailing, including emails from MBD Gestão de Investimentos Hoteleiros Lda; or (iv) withdraw your consent to share your Personal Data with third-parties, you can do it through <https://theindependent.pt/collective/contacts/>

#### 9. APPLICABLE LAWS AND JURISDICTION

The Privacy Policy, as well as the collection, handling or transmission of the User Data are ruled by the applicable laws of the Republic of Portugal.

Any litigation resulting from the validity, interpretation or execution of the Privacy Policy, or that are related with the collection, treatment or transmission of User Data, should be submitted in exclusive to the jurisdiction of the County Courts of Lisbon, without prejudice of the mandatory applicable legal regulations.