

Privacy Policy

For GENEROUSRRAIN (GRAIN), the privacy and security of the personal data of users of online services, customers, hosts, visitors, job seekers, and other partners are aspects that are of crucial importance.

The commitment to the security of personal data was assumed by GRAIN's Management and extends to all employees of the organization. GRAIN promotes information security and protection in the processing of personal data stored by the institution and collected either through personal contacts, telephone, radio communication in the maritime field, or electronically, namely through communication by email, website, social networks or sharing by partners or other interested parties.

In the processing of personal data we respect your privacy, we reiterate our commitment to implementing compliance measures, to ensure:

- a) lawful processing, supported by a legal basis, legitimate interest or consent of the data subject;
- b) that the processing is limited to the purpose for which the data was made available;
- c) that mechanisms are in place to obtain accuracy and completeness of the data provided by you;
- d) the minimization of the required data, requesting only those appropriate to the purpose;
- e) the limitation on data storage, according to the defined retention periods;
- f) the implementation of measures for the integrity and confidentiality of information.

GRAIN has defined procedures for the company's compliance with the principles described above and requirements of the new Regulation for the Protection of Personal Data (GDPR), for existing information systems and to carry out a prior impact assessment and implementation of privacy measures in new data processing to be carried out in the future.

To find out more details about how we collect, use, share and protect the personal data we obtain, please see the following sections of this Privacy Policy.

1. GENEROUSRRAIN S.A. (GRAIN)

GENEROUSRRAIN S.A. (GRAIN), is a Public Limited Company founded in 2019, which develops, among other activities, the exploration of hotel tourism developments, and which, by resolution of the Regional Government Council, has a concession contract for the private use of the space of the maritime public domain located on the site of Piedade (called "Quinta do Lorde"), in the parish of Caniçal in Machico.

GRAIN, headquartered at *Sítio da Piedade 9200-044 Caniçal*, legal person no. 515319708 is the Controller of personal data for the processing defined in point 2, in the terms of article 4 of GDPR.

GRAIN can be contacted by post to the address of its headquarters, by telephone (+351) 291 969 830 or by email to the address dataprotection@generousrain.pt.

2. Categories of Personal Data processed by GRAIN

For the execution of its duties, in compliance with its statutes and for the purpose of promoting the "Quinta do Lorde" space, as a Hotel, Marina and Real Estate Development, GRAIN may process the following categories of personal data of its visitors, customers and users of the marina, real estate customers, partners, job seekers and users of websites and social networks:

- a) Identification data (e.g. name, passport number, citizen card number, photo);
- b) Demographic data (e.g., gender, date of birth, nationality, and country of residence);
- c) Contact data (e.g. address, mobile phone, email and social media profiles);
- d) Financial data (e.g. IBAN);
- e) Professional data (e.g. employer, position, place of work)
- f) Electronic identification data (e.g. session ID, IP address used to identify a device via the Internet);
- g) Personal data made public by the data subject, (e.g. content created and publicly shared with GRAIN on social networks or public websites of third parties).
- h) Dados de telemetria pela utilização de redes WIFI, sites e aplicações disponíveis a utilizadores (e.g. IP, identificação dos equipamentos, identificação de contas de utilizadores, registos cronológicos).

3. Purposes, basis of processing and storage periods of personal data

3.1. Clients, Users and Visitors of the Marina Quinta do Lorde

In the pursuit of its duties, through a contractual relationship, legal obligation and/or legitimate interest, GRAIN may process the personal data of customers, users and visitors of Marina Quinta do Lorde, for the purposes described in the table below.

In the data processing activities within the scope of the management of the marina, GRAIN has a management agreement with the entity *Development Concessions Insulares S.L. (DECOIN)* - <https://decoin.es>, with which your data will be shared.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
Reservations, answers to questions and request for information about the Quinta do Lorde Marina by customers, users and visitors.	Identification data Contact details Electronic identification data	Pre-contractual diligences, execution of a contract and post-contractual diligences arising from the relationship with the customer, user or visitor.	For as long as the contract is ongoing or until the data subject exercises the right to rectification and erasure. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Contract management, service provision and billing of parking and related services customers at Marina Quinta do Lorde.	Identification data Contact details Demographics Financial Data	Pre-contractual diligences, execution of a contract and post-contractual diligences arising from the relationship with the customer, user or visitor.	For as long as the contract is ongoing or until the data subject exercises the right to rectification and erasure. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
Control of visiting pleasure boats, skippers, crews and other visitors that dock at the Quinta do Lorde Marina.	Identification data Contact details Demographics	Legal obligation (report to the authorities of the flow of visitors). Contractual relationship (inherent to the services provided at the Marina during the stay)	Up to 10 years after the conclusion of the contract and mandatory legal reporting. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Provision of services and invoicing to owners of visiting vessels that dock at the Quinta do Lorde Marina.	Identification data Contact details Financial Data	Contractual relationship (inherent to the services provided at the Marina during the stay)	Up to 10 years after the conclusion of the contract. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Production and sending of information, statistics on the volume of visitors to the Marina Quinta do Lorde to Regional Public Authorities (APRAM).	Identification data Demographics (Note: the data provided is anonymized)	Public Interest in the pursuit of its duties by APRAM.	Data are anonymized in the process of generating the statistical report, prior to submission.
Establishment of partnerships, management of contracts and related services with maritime tourism companies.	Identification data Contact details Professional data	Contractual relationship.	For as long as the contract is ongoing or until the data subject exercises the right to rectification and erasure. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Compliance with legal obligations, namely with the authorities, among others, of supervision, tax and fiscal, judicial and police, maritime and port control authorities.	Identification data Contact details Demographics Professional data	Legal obligation. For the declaration, exercise or defense of rights in judicial proceedings.	Legal deadline applicable at any given time for each legal and legal obligation to be fulfilled. Until the expiry of the limitation period or limitation period for the exercise of rights.
Provision of information to individuals, visitors, users or customers of Marina Quinta do Lorde, at the formal request of port authorities, police or duly authorized entities within the scope of	Identification data Contact details Demographics	Legal obligation	Legal deadline applicable at any given time for each legal and legal obligation to be fulfilled.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
administrative offence or criminal proceedings.			
Protection of people and property through Video Surveillance systems in the Marina and spaces managed by GRAIN.	Identification Data.	Legitimate interest in the security of people and property.	30 days. The deadline may be longer if there is a legal process or legal obligation to be complied with.

The processing of personal data of minors under 13 years of age is not foreseen. In exceptional situations where it occurs, the processing is only carried out with the consent of the parents or guardians of parental ownership.

3.2. Guests, customers and visitors of the Hotel Dreams Madeira Resort Spa & Marina

The GRAIN has a contract of concession of hotel management with the entity Apple Leisure Group (ALG), part of the Hyatt Group, in witch and during the contractual period, is the Controler for the processing of personal data of guests, customers and visitors at the hotel *Dreams Madeira Resort Spa & Marina*, in the terms of its Privacy Policy available at <https://www.hyattinclusivecollection.com/en/privacy-security/privacy-policy/>.

In the pursuit of its duties, through a contractual relationship, legal obligation and/or legitimate interest, GRAIN may process the personal data of guests, customers and visitors of the *Dreams Madeira Resort Spa & Marina hotel*, for the purposes described in the table below.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
Invoicing of reservations and related hotel services.	Identification data Contact details Financial Data	Execution of a contract and post-contractual diligences due to the relationship with the guest, customer or visitor.	Up to 10 years after the conclusion of the contract. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Hotel complaints and whistleblowing management	Identification data Contact details Financial Data Sensitive data	Legal obligation. GRAIN's legitimate interest for control and continuous improvement of the service levels agreements for the hotel contracts.	Up to 3 years after the last registration of the file in the complaints book or electronic records. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or other legal obligation to be fulfilled.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
Carrying out credit collection and recovery processes.	Identification data Contact details Financial Data	Performance of a contract and post-contractual steps arising from the relationship with the guest, customer or visitor.	Up to 10 years after the conclusion of the contract. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Compliance with legal obligations, namely with the authorities, among others, of supervision, tax and fiscal and judicial and police entities.	Identification data Contact details Demographics Professional data	Legal obligation. For the declaration, exercise or defense of rights in judicial proceedings.	Legal deadline applicable at any given time for each legal and legal obligation to be fulfilled. Until the expiry of the limitation period or limitation period for the exercise of rights.
Protection of people and property through Video Surveillance systems in the Hotel and spaces managed by GRAIN.	Identification data	Legitimate interest in the security of people and property.	30 days. The deadline may be longer if there is a legal process or legal obligation to be complied with.

The processing of personal data of minors under 13 years of age is only carried out with the consent of parents or guardians of parental ownership.

3.3. Real Estate Clients

GRAIN, for the purpose of real estate development of its commercial spaces in Marina Quinta do Lorde or real estate development, promotes contacts and processes personal data of individuals, representatives of collective entities or individual entrepreneurs.

Thus, GRAIN, through unequivocal consent, contractual relationship or legitimate interest, may process Your personal data for the purposes described in the table below.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
Answering questions and requesting information about properties for sale or rent.	Identification data Contact details Electronic identification data	GRAIN's legitimate interest in the promotion, dissemination and profitability of real estate.	For as long as the contract is ongoing or until the data subject exercises the right to rectification and erasure. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Provision of services and invoicing to tenants of GRAIN Properties.	Identification data Contact details	Contractual relationship.	Up to 10 years after the conclusion of the contract.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
	Financial Data		The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.
Protection of people and property through Video Surveillance systems in the spaces managed by GRAIN.	Identification Data.	Legitimate interest in the security of people and property.	30 days. The deadline may be longer if there is a legal process or legal obligation to be complied with.
Compliance with legal obligations, namely with the authorities, among others, of supervision, tax and fiscal, judicial and police.	Identification data Contact details Demographics Professional data	Legal obligation. For the declaration, exercise or defense of rights in judicial proceedings.	Legal deadline applicable at any given time for each legal and legal obligation to be fulfilled. Until the expiry of the limitation period or limitation period for the exercise of rights.
Management of timeshare contracts	Identification data Contact details Demographics Financial Data	Contractual relationship.	For as long as the contract is ongoing or until the data subject exercises the right to rectification and erasure. The period may be longer to ensure rights or duties related to the contract or if there is a legal process or legal obligation to be complied with.

The processing of personal data of minors under 13 years of age is only carried out with the consent of parents or guardians of parental ownership.

3.4. Job candidates

For the purpose of recruitment and selection activities, GRAIN may process your personal data as a job candidate, for the purposes described in the table below.

Purpose of processing	Data category	Basis of lawfulness	Shelf life
Recruitment process (collection of curricula vitae and spontaneous applications)	Identification data Demographics Contact details	Pre-contractual steps arising from the personnel selection and recruitment procedure. Consent of the data subject for storage and contact for future offers.	Up to 1 year from the date of data collection.

4. Sources of Personal Data

We process your Personal Data through the following sources:

Email and instant messaging systems: Services used to maintain electronic communications between the data subject and GRAIN, including those made available directly by us, or third-party services such as WhatsApp, SMS (short message service) and the like.

Service: Communications made with the visitor, user or client of the marina, real estate client, job seekers, partner, influencer or interested party through telephone or face-to-face contact.

Paper Records: Records completed on paper, distributed during events and other interactions with GRAIN;

Data received from third parties: Including, but not limited to: GRAIN associated entities, partners, influencers, public sources and data received within the scope of the contractual relationship with other entities.

5. Transfer of personal data with other entities

In order for GRAIN to be able to fulfil its duties and in order to provide you with a quality service, it may have to communicate your personal data, or give access to it, to other entities:

In these cases, GRAIN will only transmit your personal data to the following categories of recipients:

- a) Entities and authorities to whom personal data must be communicated by virtue of a legal obligation (e.g. control authorities, foreigners and borders service, police authorities and port authorities);
- b) Entities associated with the Group of companies to which GRAIN belongs or subcontracted by them;
- c) Entities contracted by GRAIN or by the Group, necessary for the management and operation of the *Quinta do Lorde Marina* (Desarrollos Concesionales Insulares SL - <https://decoin.es>), management and operation of the *Dreams Madeira Resort Spa & Marina hotel* (Hyatt Hotels Corporation - <https://www.hyatt.com>);
- d) Other entities contracted by GRAIN, namely: accounting, auditing, tax advice, IT assistance, IT security, data protection officer, legal services, communications;
- e) In the event of a reorganization, restructuring or merger, we may transfer the information collected to the third parties involved;
- f) Information technology and cloud hosting companies: international data transfer may occur for the purposes of fulfilling contractual obligations, GRAIN's legitimate interest or by consent of the holders, for commercial, marketing and promotion purposes.

6. Rights of the Data Subjects

Customers, guests, users, visitors, job candidates and other partners, as natural persons and as data subjects, enjoy the following rights:

6.1. Right of access

Whenever you request it, you can obtain information about which of your personal data is processed by GRAIN. You can also access your personal data, as well as obtain the following information:

- The purposes for which your personal data is processed;
- The type of personal data that is processed;
- The entities to whom your personal data may be communicated, including entities from the European Union or international organizations;
- The period for which your data will be stored or, if this is not possible, the criteria for setting this period;
- The rights you enjoy in relation to the processing of your personal data;

- If the personal data has not been collected from you, information about its origin and type of data in question.

6.2. Right to rectification

Where you consider that your personal data (provided by you) is incomplete, you can ask for it to be completed, or you can request that it be rectified if it is found to be incorrect. (e.g. address, citizen card, passport, contacts, personal preferences).

6.3. Right to erasure

In certain circumstances, the data subject may request the erasure of his or her personal data. GRAIN will inform you of the possibility or not of satisfying this right in the face of existing retention obligations due to legal imposition or legitimate interest.

6.4. Right to restriction of processing

The right to restriction of the processing of your personal data entitles you to request the controller to restrict the scope of access to and processing of your personal data or to suspend the processing activities. You may request the restriction of the processing of your personal data in the following cases:

- if you contest the accuracy of your personal data, for a period of time that allows GRAIN to verify its accuracy;
- if GRAIN no longer needs the personal data for the purposes of processing, but if such data is necessary for the establishment, exercise or defence of legal claims.

6.5. Right to data portability

You may request GRAIN to deliver, in a structured, commonly used and machine-readable format, the personal data provided by you. You also have the right to request that GRAIN transmit this data to another controller, as long as this is technically possible.

The right to portability only applies in the following cases:

- where the processing is based on unambiguous consent or the performance of a contract;
- where the processing in question is carried out by automated means.

6.6. Right to object

You have the right to object to the processing of your personal data at any time, on grounds relating to your particular situation, and when the processing is carried out for purposes other than those for which the data were collected, but which are compatible with them.

In such cases, GRAIN will cease to process your personal data, unless it has legitimate reasons to carry out such processing and that these reasons prevail over your interests.

The exercise of your right to object may imply the suspension or termination, in whole or in part, of the benefits associated with the purpose of the processing of the data in question.

You can also object to the processing of your data for direct marketing purposes.

6.7. Right to withdraw your consent

In cases where the processing of data is based on your consent, you may withdraw your consent at any time.

If you withdraw your consent, your personal data will no longer be processed, unless there is another ground, such as legal and regulatory obligations or the public interest of GRAIN, that justifies such processing.

6.8. Right to lodge complaints with GRAIN or the supervisory authority

The exercise of your rights is free of charge, unless the request is manifestly unfounded or excessive, in which case a reasonable fee may be charged considering the associated costs.

The response to your requests must be provided within a maximum period of 30 days, unless it is a particularly complex request, in which case this period may be longer.

To exercise your rights as a holder of personal data, you may contact GRAIN through the contacts below:

- **E-mail:** through e-mail, to the address dataprotection@generoursrain.pt;
- **Mail:** Sítio da Piedade, 9200-044 Caniçal, Machico, Madeira Island - Portugal.

If you wish to file a complaint regarding matters related to the processing of your personal data, you may do so with the *Comissão Nacional de Proteção de Dados (CNPd)*, the competent supervisory authority in Portugal (www.cnpd.pt).

7. Changes to this policy

GRAIN may change this Privacy Policy at any time to reflect current privacy practices. When we make changes to this statement, we review the "updated date" in the document footer. We advise you to periodically read this Privacy Policy so that you are aware of how GRAIN protects your information.