



PREMIUM TRAVEL
TRANSALPINO

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Privacy Policy - Premium Travel Transalpino

Privacy Notice

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1. Introduction

This Privacy Notice ('Notice') sets out how Premium Travel Transalpino protects the privacy of the Personal Data of our employees, customers, partners or any other entity with which Premium Travel Transalpino relates in the context of its activity.

As a travel agency, Premium Travel Transalpino needs to collect, use and disclose Personal Data in order to carry out its business functions and activities, including making and managing travel bookings on behalf of its customers. At Premium Travel Transalpino, we are committed to protecting the privacy and confidentiality of Personal Data and to maintaining a controlled environment (physical, electronic, human and procedural controls) in line with operational risks.

In the context of the General Data Protection Regulation 2016/679 ('GDPR'), Premium Travel Transalpino is a 'data controller' of any personal information provided to us in the context of the relationship with our customers or any other Interested Parties.

By providing Personal Data, Stakeholders agree that this Notice will apply to how we handle their Personal Data and consent to its collection, use and disclosure as detailed in this Notice. If they do not agree with any part of this Notice, Interested Parties should not provide us with their Personal Data. Personal Data to us. If they do not provide us with their Personal Data, as well as if they withdraw the Consent they have provided in accordance with this Notice, this may affect our ability to provide the services to them, or negatively affect the quality of the services we can provide to them. For example, most travel bookings must be made with the traveller's full name and must include contact details and appropriate identification (e.g. passport details) and we cannot make bookings without this information. Please note that there may be cases where local data protection laws impose more restrictive Personal Data processing practices than those set out in this Notice. When this occurs, we will adjust our Personal Data processing practices to comply with those same local laws.

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2. What Personal Data do we collect?

Personal Data has the meaning given by local data protection laws and, where the GDPR applies, the meaning is deemed to be given under the GDPR. Personal Data generally means data relating to an individual who can be identified from that data; or is identifiable from the combination of that data with other available data.

Generally, the type of Personal Data we collect is necessary to facilitate travel arrangements, support bookings or to organise travel-related services and/or products on behalf of our customers.

In this sense, we usually process the following types of Personal Data about our customers:

- Contact details (such as name, home / mailing address, telephone number, e-mail address);
- Payment details;
- Passport details;
- Loyalty programme / frequent flyer data;
- Data on dietary requirements and health problems (if any); and
- Other data relevant to travel plans or required by the travel service provider(s) (e.g. airlines and accommodation or tour providers).

When our customers contact us for other purposes, Personal Data related to those purposes may also be collected. For example, we may collect Personal Data to be able to contact our customers in the context of a competition/campaign they have entered or to respond to questions or comments they have sent us. We also collect data necessary for use in our business activities or those of our related entities, including, for example, financial details necessary to process transactions, video surveillance images used for security purposes or other relevant Personal Data that our customers may wish to provide to us.

In some circumstances we collect Personal Data that may be considered sensitive data under local data protection laws. Sensitive data may include (without limitation) racial or ethnic origin, philosophical or religious beliefs or affiliations, sexual preferences or practices, criminal record or alleged criminal offence, membership of political, professional or trade associations, biometric and genetic information, financial data and health data. We will only collect sensitive data in accordance with local data protection laws, with the explicit consent of the data subjects and where the data is reasonably necessary or directly related to one or more of our operational functions or activities (for example, to make travel arrangements), unless required or authorised to do so by law. To the extent permitted or required by local data protection laws, our customers consent to us using and disclosing their sensitive data solely for the purpose for which it was collected, unless we subsequently receive their consent for another purpose.

For example, if our clients provide us with health data relating to a travel insurance policy they wish to take out, they consent to us using and disclosing that health data on their behalf in contacts with the organisation promoting that travel insurance. Another example is when our customers want to make their religious beliefs known because they are interested, for example, in certain holiday packages, consenting to the use and disclosure of this information for the purposes of making the trip operational. We will not use sensitive data for purposes other than those for which it was collected, unless we receive the consent of the data subject to do so.

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3. How do we collect Personal Data?

We only collect Personal Data in compliance with local data protection laws. We generally collect Personal Data in the context of contacts made with our customers, unless it is unreasonable or impracticable to do so. Generally, this collection will occur when our customers:

- contact us in person, by telephone, letter, e-mail;
- visit us via our website; or
- contact us via social media.

We may also collect Personal Data when our customers:

- purchase or make enquiries about travel arrangements or other products and services;
- enter competitions or register for campaigns / promotions;
- sign up to receive marketing communications (e.g. e-newsletters);
- request brochures or other information.

In some circumstances, it may be necessary to collect Personal Data about our customers from third parties. This includes cases where an individual makes a travel booking on behalf of another person(s) (for example, a family booking, a group booking or a booking made by an employer). When this happens, we rely on the permission of the person making the travel booking to act on behalf of any other traveller on the booking, as well as that person's consent to collect, use and disclose Personal Data in accordance with this Notice. Our customers should inform us immediately if they become aware that their Personal Data has been provided to us by another person without their consent or if they have not obtained such consent before providing us with another individual's Personal Data.

We make every effort to maintain the accuracy and completeness of the Personal Data we store and to ensure that all Personal Data is up to date. However, any Stakeholder may contact us immediately if there is any change to their Personal Data or if they become aware that we hold inaccurate Personal Data (please see section 13 below). We cannot be responsible for any losses arising from inaccurate, erroneous, defective or incomplete Personal Information that Stakeholders, or someone acting on their behalf, provide to us.

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4. How do we use Personal Data?

We will only process Personal Data when:

- We have been given consent to such processing (which we may withdraw at any time, as detailed in section 8 of this Notice);
- Such processing is necessary for us to provide our services;
- Such processing is necessary for the fulfilment of legal obligations; and/or
- Such processing is necessary for our legitimate interests or those of any third party receiving such Personal Data (as detailed in sections 5 and 6 of this Notice).

When a customer contacts us in the context of a travel enquiry or booking, the purpose for which we collect their Personal Data is generally to provide travel advice and/or assist in booking travel-related products and/or services. However, the purpose of collection may be different depending on the specific circumstances disclosed in this Notice (e.g. collection of Personal Data for the purposes of participating in a campaign, collecting feedback, etc.).

When a customer makes a booking for travel or products/services with our support, we generally act as an agent for the travel service providers (e.g. for a hotel). In this case, we process Personal Data as necessary to provide the requested services, including collecting Personal Data for our internal purposes as described in this Notice and for the travel service provider for whom we act as an agent (e.g. to provide the contracted services). For example, if you book a flight through Premium Travel Transalpino, we will use the Personal Data to enable the flight to be booked and we will disclose the Personal Data to the airline to enable it to provide the flight service.

We may share data with our travel service providers (hotels, airlines, car hire companies or other providers related to travel bookings). These travel service providers may also use Personal Data as described in their respective privacy policies to obtain additional information to facilitate the booking of the trip or the provision of the requested services. We recommend that our Clients review the privacy policies of any travel service providers that are purchased through Premium Travel Transalpino. We will provide copies of all relevant travel service providers' terms, conditions and privacy policies upon request.

We act as agents for many travel service providers around the world, so it is not possible to mention in this Notice all the travel service providers for which we act (in particular their locations). For more information on the disclosure of Personal Data to travel service providers located outside the GDPR context, please refer to section 6 of this Notice.

If there are any concerns regarding the transfer of Personal Data to a travel service provider, or if further information is required, please refer to section 13 of this Notice.

The purposes for which we collect Personal Data also include:

- providing services or tools that our customers choose to use (e.g. saving travel preferences on our website in a wish list or saving Personal Data to enable them to fill in online forms in advance);
- identifying fraud or errors;
- legal or regulatory compliance;
- developing and improving our products and services;
- maintaining or improving the relationship with our customers, namely by creating and maintaining a customer profile that allows us to provide a service aligned with their preferences;
- market research, assessing customer satisfaction and collecting feedback on the services we provide;
- facilitating our customers' participation in loyalty programmes;
- carrying out analyses related to our services, including, but not limited to, sales and travel destination preference trends;
- support internal organisation and accounting;
- support compliance with legal obligations or applicable customs / immigration requirements related to travel; and

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- other purposes as authorised or required by law (for example, to prevent a threat to life, protection of health or safety, or to enforce Premium Travel Transalpino' s legal rights).

Where permitted by local data protection laws, we may use Personal Data to carry out marketing activities relating to our products and services (and those of third parties) that we believe may be of interest to our customers, unless they have asked us not to receive such information. These campaigns may include, but are not limited to, email blasts, digital marketing and other electronic notifications. Personal Data will be used to send digital marketing material (including e-newsletters, e-mail, SMS, MMS and IM) if Customers have opted in to receive them. Customers can sign up to receive e-newsletters and other promotional / digital marketing material by following the relevant links on our website or by asking one of our employees to do so.

Any individual who does not wish to receive promotional or marketing material from us, or to participate in market consultations or receive other types of communication, should refer to sections 8 and 13 of this Notice.

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5. What Personal Data is disclosed to third parties?

At Premium Travel Transalpino we do not sell, rent or trade Personal Data.

Personal Data. Personal Data will only be disclosed to third parties as set out in this Notice and in accordance with local data protection laws (note: in this Notice, reference to 'disclose' includes transferring, sharing verbally or in writing, sending or making available Personal Data to another entity).

Personal Data may be disclosed to the following types of third parties:

- contracted entities, suppliers and service providers, including:
- the situations of each of the circumstances described in section 4 of this Notice ('How do we use Personal Data?');
- providers of ICT solutions that support us in providing products and services (such as any external data hosting providers we may use);
- publishers, printers and distributors of marketing material;
- event and exhibition organisers;
- marketing or market research agencies;
- courier services; and
- external consultants (such as lawyers, accountants, auditors or recruitment consultants);
- travel service providers, such as travel wholesalers, tour operators, airlines, hotels, car hire companies, transfer managers and other related service providers;
- any third party to whom we assign or transfer any of our rights or obligations;
- persons making travel bookings on behalf of others (for example, a family member, friend or work colleague);
- employers, in the context of business travel for corporate, business or government clients;
- contact persons (e.g. a family member) where our clients are not contactable and contact is, in our opinion, in the Client's best interests (e.g. where the person is concerned for their welfare or needs to act on the Client's behalf due to unforeseen circumstances);
- as required or authorised by applicable law, and to comply with Premium Travel Transalpino's legal obligations;
- customs or immigration services to fulfil legal obligations applicable in the context of the trip;
- government agencies or public authorities to comply with valid and authorised requests, including court orders or any other valid legal process;
- regulatory or law enforcement authorities, including for fraud protection and related security purposes; and
- law enforcement agencies where unlawful activity is suspected and Personal Data is a necessary part of investigating or reporting the matter.

In addition to the above, we will not disclose Personal Data without consent unless we believe disclosure is necessary to lessen or prevent a threat to life, health protection or safety of an individual, for public health or safety, or in order for a particular action to be taken by an enforcement body (e.g. prevention, detection, investigation or prosecution of criminal offences), or where such disclosure is authorised or required by law (including applicable data protection/privacy laws).

On Premium Travel Transalpino websites or social networks, users may choose to use certain third-party resources with which we are associated. These features, which may include social networking and geo-localisation tools, are operated by third parties and are clearly identified as such. These third parties may use or share Personal Data in accordance with their own privacy policies and we recommend consulting their privacy policies if you consider these tools relevant.

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6. What Personal Data is transferred abroad?

We may disclose Personal Data to certain recipients abroad, as described below. We will ensure that such international transfers are necessary for the performance of a contract between our clients and the overseas third parties or are subject to appropriate or adequate safeguards as required by local data protection laws (e.g. GDPR). We will provide copies of the relevant safeguard documents on request (see section 13 of this Notice).

It is possible that Personal Data will be transferred to an overseas entity located in a jurisdiction where it is not possible to guarantee a level of data protection equal to that existing in the context of the GDPR. In such cases, Premium Travel Transalpino cannot be held responsible for how these recipients handle, store and process Personal Data.

(a) Related entities abroad

Premium Travel Transalpino operates a global business, including operations worldwide. Personal Data may be disclosed with our related entities abroad to support the booking of travel and/or to enable the performance of administrative, advisory or technical services, including the storage and processing of such data.

b) Travel service providers located abroad

In order to provide our services, it may be necessary for us to disclose Personal Data to relevant travel service providers abroad. We deal with many different travel service providers around the world, so the location of a relevant travel service provider will depend on the travel services provided. Relevant travel service providers will in most cases receive Personal Data in the country in which they will provide the services or in which their business is based.

(c) Our service providers located abroad

We may also need to disclose Personal Data to service providers located abroad for the purpose of supporting the provision of the services, including the storage and processing of such data. Generally, we will only disclose Personal Data to such recipients abroad in the context of a travel booking and/or to enable the provision of administrative and technical services provided on our behalf.

If you have any specific questions about where or to whom Personal Data may be sent, please refer to section 13 of this Notice.

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7. Information security

At Premium Travel Transalpino we are committed to protecting Personal Data by implementing and maintaining appropriate technical, organisational and human control measures to ensure a level of security in line with the risks related to:

- accidental or unlawful destruction;
- loss; alteration or unauthorised disclosure;
- or improper access to Personal Data transmitted, stored or processed.

Premium Travel Transalpino regularly monitors and reviews security controls and endeavours to protect Personal Data in the same way it protects your sensitive business information.

Premium Travel Transalpino destroys or de-characterises Personal Data whenever it is no longer relevant to the business or as required by law.

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8. Rights in relation to the Personal Data we collect

If any interested party of which Premium Travel Transalpino holds Personal Data wishes to:

- update, modify, delete or obtain a copy of the Personal Data; or
 - restrict or prevent Premium Travel Transalpino from using any personal information, including by withdrawing any consent it has previously given for the processing of such information; or
 - obtain a copy of the personal information that has been processed on the basis of your consent or as necessary for the performance of a contract to which you are a party,
- you must formally make the request to Premium Travel Transalpino through the contacts identified in section 13 of this Notice. The request will be acknowledged and information will be given as to the period within which the Information will be made available.

Premium Travel Transalpino will endeavour to respond to such requests within one month or less, although it may be necessary to extend this period for complex requests.

In addition, Premium Travel Transalpino reserves the right to deny access to the Information for any reason permitted by applicable laws. If the request to access or correct the Information is denied, the reasons for such denial will always be communicated in writing, unless it is unreasonable to do so or when required by local data protection laws.

All communications related to requests for access to Personal Data must be made formally in writing through the contacts identified in section 13 of this Notice.

If Premium Travel Transalpino is asked to restrict or stop using Personal Data by withdrawing the consent previously provided for the processing of Personal Data, the ability to provide services or the quality of services may be negatively impacted. For example, most travel bookings must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details), and it is not possible to make bookings without this information.

The Personal Data shared with Premium Travel Transalpino must be accurate and individuals agree to update it whenever necessary. In addition, they agree that, in the absence of any update, Premium Travel Transalpino may assume that the data submitted is correct.

Any individual may at any time request Premium Travel Transalpino to stop sending marketing communications, by using the unsubscribe links provided in marketing emails or through the contacts indicated in section 13 of this Notice.

In any of the situations listed above, the provision of a valid means of identification of the applicant may be requested to ensure that Premium Travel

Transalpino complies with its security obligations and prevents the unauthorized disclosure of Personal Data.

Premium Travel Transalpino reserves the right to charge a reasonable administrative fee following any manifestly unfounded or excessive requests regarding access to Personal Data or for any additional copies of the Personal Data requested.

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9. Social Media Integrations

Premium Travel Transalpino's websites and mobile applications may use social media features and tools (such as "Like" and "Share" buttons). These features are provided and operated by external companies (e.g. Facebook) and hosted by external companies or directly on our website or mobile application. The Social Tools may collect data related to the page visited on the website/mobile application, the IP address and may set cookies to improve the functioning of the Social Tools.

In the event that you have activated social media accounts, they may be able to share data about the visit and use of our website or mobile application with those same social media accounts. In this way, interactions with Social Tools may be recorded by third parties. In addition, third-party companies may share Personal Data with Premium Travel Transalpino in accordance with their policies, such as your name, profile picture, friend lists, or any other information that individuals have chosen to make available with those companies. In these cases, we may share this data with a third-party company for the purpose of boosting targeted marketing through these same social media platforms. In this situation, users have the option to manage data sharing and be able to opt out of targeted marketing in the privacy settings of their social networks.

All interactions with the Social Tools are governed by the privacy policy of the third-party company providing them. More information about the data protection practices of these companies should be found directly in the privacy policy of these same companies.

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10. IP addresses

When a user accesses the website, uses any mobile application, or opens digital correspondence from Premium Travel Transalpino, the servers may record data regarding the device or network to which the user is connected, including the IP address. An IP address is a series of numbers that identify a computer and are assigned when accessing the Internet.

IP addresses may be used by Premium Travel Transalpino for system administration, investigation of security problems and compilation of anonymous data on the use of the website and/or mobile applications. IP addresses may also be associated with other Personal Data available about individuals for the purposes described above (for example, to better tailor marketing and advertising materials, provided that you have opted in to receive digital marketing).

11. Tracking Technologies / Cookies

Premium Travel Transalpino may use web analytics services from external providers to its websites and mobile applications, such as those listed in the "Cookie Policy". Providers of these services may use technologies such as cookies and web beacons to help analyze visitors who use the websites and applications.

For information on the use of cookies and tracking technologies, please consult the Cookie Policy of Premium Travel Transalpino.

12. Linked websites

Premium Travel Transalpino websites may contain links to third-party websites over which Premium Travel Transalpino has no control. Premium Travel Transalpino is not responsible for the privacy practices or the content of linked websites. Premium Travel Transalpino recommends reading the privacy policies of any associated websites that are visited, as their privacy practices and policies may differ from those of Premium Travel Transalpino

13. Feedback/Complaints/Contact

Any questions, comments or complaints about this Notice or the processing of Personal Data; or if you wish to inform Premium Travel Transalpino about a change or correction of the Personal Data; or if you wish to receive information about the Personal Data that is processed by Premium Travel Transalpino; or for any complaint or comment relating to data protection; should be addressed to Premium Travel Transalpino through the contacts below:

Contact name at Premium Travel Transalpino: Miguel Santos

Email: privacidade@transalpino.pt

Address: Largo de São João 1A, 2770-185 Paço de Arcos – Portugal

Premium Travel Transalpino will respond to any queries or complaints received as soon as possible.

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14. Changes to the Notice

This Notice may be amended and updated. In the event that a change is made to the Notice, the revised version will be duly archived and published and dated on the Premium Travel Transalpino website, where it exists. If justified, in addition to updating the Notice, we may ask customers for consent to include other types of processing.

This Privacy Notice was last updated on 30 September, 2024.