

Privacy Policy / Privacy Notice

<Sousa & Tavares SA>

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| RESPONSIBLE: | <Nélio Abreu > |
| APPROVAL: | < Willy de Sousa > |
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- Other details relevant to the travel plans or required by the relevant travel service provider(s) (e.g. airlines and provider of accommodation or tourism).

When our customers contact us for other purposes, Personal Data related to those purposes may also be collected. For example, we may collect personal information so that we may contact our customers about a contest / campaign that has signed up or to respond to a question or comment they have sent us. We also collect data necessary for use in the business activities of <Windsor Premium Travel> and our related entities, including, for example, financial details required to process multiple transactions, video surveillance images used for security purposes, or other relevant Personal Data you may choose to provide us.

In some circumstances, we may collect Personal Data from our customers that may be considered sensitive data in accordance with 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 history and the alleged commission of an offense, affiliation to political, professional, or commercial associations, biometric and genetic information, financial data, and health data. We will only collect sensitive data in accordance with local data protection laws, with explicit consent of the subject and where the data is reasonably necessary or directly related to one or more of our functions or operational activities (for example, travel), unless required or permitted to do so by law. To the extent permitted or required by local data protection laws, our customers consent that we use and disclose your sensitive data solely for the purpose for which it was collected, unless we subsequently receive your consent for another purpose. For example, if our clients provide us with health information related to travel insurance that they wish to do, customers consent that we use and disclose such health information on their behalf in the contacts made with the entity that promotes such travel insurance. Another example is when our customers can divulge their religious beliefs because they are interested, for example, in certain vacation packages, the use and disclosure of this information to make the trip operational. We will not use sensitive data for purposes other than those for which it was collected, unless we receive consent for another purpose.

4. How do we use Personal Data?

We will only process Personal Data when:

- Consent has been given for such processing (which may be withdrawn at any time, as detailed in section 8 below);
- Processing is necessary to provide our services;
- Processing is necessary for compliance with legal obligations; and / or
- Processing is necessary for our legitimate interests or for any third party receiving Personal Data (as detailed in sections 5 and 6 below).

When you contact us regarding an inquiry or travel reservation, the purpose for which we collect your personal information is generally to provide you with travel advice and / or to help you book travel-related products and services. However, the purpose of the collection may be different depending on the specific circumstances disclosed in this Notice (e.g. collection of Personal Data for participation in a contest, provision of feedback, etc.).

When a customer makes a reservation or organizes travel-related products and services with our support, we generally act as an agent for travel service providers (e.g. for a hotel). In this case, we process Personal Data as necessary to provide the requested services. This usually includes the collection of Personal Data for internal purposes as described in this Notice, and for the travel service provider for whom we act as an agent (for example, to provide contracted services). For example, if you book a flight through <Windsor Premium Travel>, we will use the Personal Data to allow the flight to be booked and we will disclose the Personal Data to the airline to allow it to provide the flight service.

We may share data with our travel service providers (hotels, airlines, car rental companies or other providers related to travel reservations). These travel service providers may also use the Personal Data as described in their respective privacy policies for additional information that facilitates booking the trip or providing the services requested. We recommend that our Customers review the privacy policies of any travel service providers that are purchased through <Windsor Premium Travel>. We will provide copies of all relevant terms, conditions, and privacy policies of travel service providers upon request.

We act as agents for or on behalf of many thousands of travel service providers worldwide, so it is not possible to refer in this Notice to all the travel service providers for which we operate (in particular their locations). For more information on disclosure of Personal Data to travel service providers located outside the RGPD context, see section 6 below.

If there is any concern 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:

5. What personal information is disclosed to third parties?

At Windsor Premium Travel we do not sell, rent, or exchange Personal Data. Personal Data will only be disclosed to third parties in accordance with the provisions of this Notice and in accordance with local data protection laws (note: in this Notice the reference to "disclosing" includes transferring, verbal, or written sharing, sending, or making available data to another person or entity).

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

- contracted entities, suppliers, and service providers, including:
 - in each of the circumstances described in section 4 ("How do we use Personal Data?");
 - providers of ICT solutions that support us in delivering products and services (such as any external data-hosting providers we can use);
 - publishers, printers, and distributors of marketing material;
 - organizers of events and exhibitions;
 - marketing or market consulting agencies;
 - courier services or 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 rental companies, transfer managers and other related service providers;
- any third party to whom we assign or transfer any of our rights or obligations;
- people making travel reservations on behalf of others (for example, a family member, friend, or co-worker);
- Employers, in the context of corporate, corporate or government business trips;
- contact persons (for example, a family member) when our Customers are not contactable, and the contact is in our opinion of Customer's interest (e.g. where the person is concerned about their well-being or needs acting on behalf of Customer due to unforeseen circumstances);
- as required or authorized by applicable law, and to comply with the legal obligations of the Windsor Premium Travel;
- customs or immigration services to comply with applicable legal obligations in the context of travel;
- government agencies or public authorities to comply with valid and authorized requests, including court orders or other valid legal process;
- regulatory authorities or law enforcement authorities, including for fraud protection and related security purposes; and
- supervisory agencies where there is suspicion of illegal activity and that the Personal Data are a necessary part for investigation or denunciation of the subject.

In addition to the above, we will not disclose personal information without consent, unless we believe disclosure is necessary to reduce or prevent a threat to life, health or

6. What Personal Data are transferred abroad?

We may disclose personal information to certain recipients abroad as described below. We will ensure that such international transfers are necessary for the execution of a contract between our Customers and third parties abroad or that are subject to appropriate or adequate safeguards as required by local data protection laws (e.g. GDPR). We will provide copies of the relevant safeguards documents upon request (see section 13 below).

It is possible that Personal Data are transferred for a foreign entity located in a jurisdiction where it is not possible to guarantee a data protection level equal to that in the context of GDPR. In these cases, the Windsor Premium Travel you cannot be responsible for how these recipients handle, store, and process your Personal Data.

(a) Related entities abroad

The Windsor Premium Travel operates a global business, including operations in <Ireland, Canada, Italy, France, Spain, Japan and Sweden>. Personal data may be disclosed with our related entities abroad for support in the travel reservation and / or to enable administrative, consultative, or technical services, including the storage and processing of such data.

b) Travel service providers located abroad

To provide our services, it may be necessary for us to disclose personal data to relevant suppliers of travel services 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 on which their business is based.

(c) Our service providers located abroad

We may also have to disclose personal data to service providers located abroad for supporting the provision of services, including the storage and processing of such data. Generally, we will only disclose personal information to such recipients abroad in the context of a travel reservation and / or to allow the provision of administrative and technical services provided on our behalf.

If there is any specific doubt as to where or for whom personal data can be sent, see section 13 of this Notice.

8. Rights in relation to the Personal Data we collect

Should any interested party that the Windsor Premium Travel have Personal Data intend to:

- update, modify, delete, or obtain a copy of Personal Data; or
- restrict or prevent the Windsor Premium Travel from using any personal information, including withdrawing any consent you have previously given for the processing of such information; or
- obtain a copy of personal information that has been processed based on the consent or as required to perform a contract.

Interested parties must formally submit the request to Windsor Premium Travel through the contacts identified in section 13 of the Notice. After the request will be given an acknowledgment of the same and information will be given on the deadline within which the information will be made available.

The Windsor Premium Travel will make every effort to respond to such requests within one month or less, although it may be necessary to extend this period for complex requests.

In addition, Windsor Premium Travel reserves the right to deny access to the Information for any reason permitted by applicable law. If the request for access or correction of the Information is denied, the reasons for such refusal 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 to the Data Protection Officer through the contacts indicated in section 13 of the Notice.

If Windsor Premium Travel is requested to restrict or stop using Personal Data, withdrawing the consent previously provided for the processing of Personal Data, the ability to provide services or the quality of services may negatively impact the services. For example, most travel reservations must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details), and reservations cannot be made without this information.

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

Any individual may at any time ask Windsor Premium Travel to stop sending marketing communications and may use the cancellation links provided in the marketing emails or through the contacts indicated in section 13 Notice.

9. Integrations with Social networks

The Windsor Premium Travel websites and mobile applications can use social networking features and tools (like "Like" and "Share" buttons), ("Social Networks Resources"). These features are provided and operated by outside companies (for example, Facebook) and hosted by outside companies or directly on our website or mobile application. Social Networks Resources may collect data related to the page visited on the website / mobile application, the IP address and may set cookies to allow the RS Feature to function properly.

If the user has activated social networking accounts, then they may be able to share data about visiting and using our website or mobile application with social network accounts. Likewise, interactions with RS resource can be registered by third parties. In addition, the external company may share with Windsor Premium Travel personal data in accordance with its policies, such as your name, profile picture, friend lists or any other information you have chosen to make available, and we may share data with the outsourced company for promoting the marketing directed through the platform of social networks. Users can manage data sharing and turn off targeted marketing in the privacy settings of their social networks.

All interactions with Social Networks Resources are governed by the privacy policy of the external company that provides them. More information on the data protection practices of these companies should be consulted directly in the privacy policy of these companies.

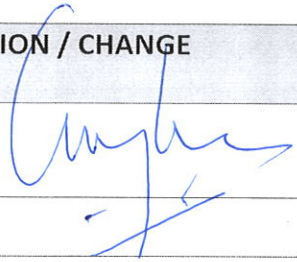
13.The changes to notice

This Notice may be changed from time to time. If a change to the Notice is made, the revised version will be published and dated on the Windsor Premium Travel website. If justified, in addition to updating the Notice, consent may be requested for certain types of treatment.

This Privacy Notice was last updated on August 03, 2018

14.Document control

Revision History / Changes

| VERSION | DATE | AUTHOR | APPROVER | REVISION / CHANGE |
|---------|------------|--------------|----------------|---|
| 0.1 | 03.08.2018 | Paulo Amaral | Willy de Sousa |  |
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Distribution list

| Recipients |
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| Website: www.windsormadeira.com |

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