PRIVACY POLICY

Updated on 24.02.2026

This policy applies to all companies that are part of the Grupo Vista Alegre Atlantis S.A. (hereinafter "Grupo Vista Alegre") and aims to inform Clients, Users and the general public about the personal data process.
At Grupo Vista Alegre, we value your privacy and, therefore, we want you to know how we handle your personal data, what your rights are and how you can clarify any doubts you may have. Thus, we would appreciate it if you could take a few minutes of your time to read the terms below.

This Privacy Policy is intended to provide Customers of physical stores and Users of websites hosted at:

- vistaalegre.com
- bordallopinheiro.com
- casaalegre.com
- cartaoprivate.vistaalegre.com
- ccva.vistaalegre.com
- hotelware.vistaalegre.com
- b2b.vistaalegre.com

(hereinafter referred to as the "website"), detailed information on how Grupo Vista Alegre Atlantis, S.A., with its headquarters at Lugar da Vista Alegre, 3830-292 Ílhavo - Portugal, processes your personal data as the data controller.

As a rule, Personal Data is collected from the Client/User at the time of establishing a contractual relationship with Grupo Vista Alegre, whether through a purchase in one of our physical stores or through our websites, a request, a contact or information request, subscription to a newsletter or a certain service or upon joining a loyalty program.

The use of the Website by any user shall be governed by the Terms and Conditions of use ("Terms and Conditions"), and its use implies acceptance by the User. If the User rejects the Terms and Conditions, he/she must immediately cease using the Website.

Whenever Grupo Vista Alegre determines the purposes and means of processing Personal Data, it will be considered an autonomous Data Controller, ensuring compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, and other applicable legislation and data protection and privacy matters ("Data Protection Legislation"). With regard to the Personal Data processing activities carried out through the Website, Grupo Vista Alegre will act as the Personal Data Controller, and the Data Subjects must use the contacts provided in Point 10 for any question related to data protection.
Under the terms of the Data Protection Legislation, Grupo Vista Alegre strives for the processing of Personal Data in accordance with all applicable principles, namely: i) Principle of Lawfulness, Loyalty and Transparency; ii) Principle of Purpose Limitation; iii) Data Minimization Principle; iv) Principle of Accuracy; v) Principle of Conservation; and, vi) Principle of Integrity and Confidentiality.
In view of the above, this Data Protection and Privacy Policy ("Privacy Policy") is established, and the Grupo Vista Alegre undertakes to carry out any and all Personal Data processing operations in accordance with the provisions of the following points:

1. GROUNDS OF LAWFULNESS AND PURPOSES OF DATA PROCESSING

The Personal Data of the Data Subjects will be processed by Grupo Vista Alegre on the following legal grounds:

Grounds for Lawfulness	What do they consist of?
Consent	The Data Subject may consent to the respective processing through a free, specific, informed and explicit expression of will, by which he/she accepts, by means of a declaration (in writing or orally) or an unequivocal positive act (by filling in an option), that his/her Personal Data will be processed.
Pre-contractual measures or the performance of a contract	Personal Data may be processed if necessary, including but not limited to, for the performance of a contract to provide services and/or supply products to which you are

Grounds for Lawfulness	What do they consist of?
	a party as an Employee, Client and/or Supplier, or to carry out pre-contractual measures at your request.
Compliance with a legal obligation	Personal Data may be processed to ensure and guarantee compliance with legal obligations to which it is subject under the legislation of a Member State and/or the European Union.
Defence of the vital interests of the Data Subject	Personal Data may be processed to ensure the defence of your vital interests, namely when the same processing is essential to your life.
Legitimate Interests	Grupo Vista Alegre, other Controllers or Third Parties may process Personal Data provided that such processing does not override your interests or fundamental rights and freedoms. In view of the above, the collection of Personal Data based on the grounds of lawfulness set out above will be essentially for purposes related to the development of the activities of Grupo Vista Alegre.

2. DISCLOSURE AND TRANSMISSION OF PERSONAL DATA

The employees of Grupo Vista Alegre will process the Personal Data of the Data Subjects in the course of their job functions and will process the Personal Data exclusively under the terms specified in this Privacy Policy. Personal Data may be made available to third parties in charge of providing services to Grupo Vista Alegre ("Subcontractors"), bound by a written contract and processing the data under the terms of this Privacy Policy, and may not process them, directly or indirectly, for any other purpose, for their own benefit or that of a third party.

Data Subjects have the right to obtain a complete and updated list of Subcontractors (if any) contracted by the Grupo Vista Alegre, and for this purpose they must submit a specific request to Grupo Vista Alegre under the terms set out in Point 10 of this Privacy Policy.

In compliance with legal obligations, the Personal Data of Data Subjects may be transmitted to third parties for their own purposes, namely banks and insurance companies, judicial, administrative, supervisory or regulatory authorities and also entities that lawfully carry out data collection actions, actions to prevent and combat fraud.

In accordance with the duty of information to which Grupo Vista Alegre is obliged, below are the categories of sub-contractors to whom the personal data Grupo Vista Alegre customers and other website users are disclosed:

Categories of subcontracting companies	Purposes of processing personal data
Shared services companies	Provision of services for administrative and financial management and information systems of Grupo Vista Alegre
Companies providing licensing, maintenance, support and technical assistance for software and systems	Management / maintenance / support of systems and software that support Grupo Vista Alegre's business
Companies processing payment services, EDI services and electronic billing, accounting, tax and administrative management and support software	Economic and accounting management of customer, supplier and service provider billing
Logistical support companies / Carriers	Delivery service for products purchased by customers

Commercial Promoters	Promotion / Sales of Grupo Vista Alegre services
Direct marketing support companies / digital marketing partners	Help in managing e-mail marketing, performance analysis, user profile analysis and impact and dissemination of advertising
Companies that evaluate customer satisfaction	Sending customer evaluation questionnaires
Security / surveillance companies and security systems preventive and corrective maintenance companies	Video surveillance and surveillance for the security of people and property
Customer service companies	Customer care and contact services.

3. TREATMENT METHODS

The processing of Personal Data will be carried out both automatically and manually using IT tools, applying logics strictly related to the purposes and, in any case, promoting the security and confidentiality of Personal Data.

4. INTERNATIONAL TRANSFERS

Grupo Vista Alegre may transfer the Data Subject's Personal Data outside the European Economic Area ("EEA") to locations that may not guarantee the same level of protection. However, if applicable, Grupo Vista Alegre will only carry out transfers of Personal Data outside the EEA, in accordance with the following measures:
Where the transfer is carried out to a location or by a method or in circumstances that the European Commission considers to ensure adequate protection of Personal Data;
Where it has implemented standard contractual data protection clauses approved by the European Commission or a competent supervisory authority; or
Where none of the above applies, but the law nevertheless authorizes such a transfer, for example, if it is necessary for the establishment, exercise or defence of legal claims

in judicial proceedings. You may request detailed information on the security measures that Grupo Vista Alegre has in place regarding transfers of Personal Data outside the EEA and, where applicable, a copy of the standard contractual data protection clauses in force at Grupo Vista Alegre through the contacts provided in Section 10.

5. PROCESSING OF PERSONAL DATA

The processing of your personal data has the following purposes:

Purpose	Ground for Lawfulness	Retention Period
Website Management	Performance of the contract, the terms of which are governed by the Terms and Conditions of the Website	Up to 1 year after the last visit to the Website
Contractual Relationship Management	Contract Performance	Up to 3 years after the last contact or the end of the contract
Recording electronic communications by web chat within the contractual relationship	Consent	Up to 24 months after call recording
Recording calls within the contractual relationship		
Recording calls for monitoring quality of service		Up to 30 months after call recording
Satisfaction questionnaire	Legitimate interest	Up to 30 days after interaction
General profile analysis	Legitimate interest	Up to 3 years after collection

Sending commercial communications	Consent	Up to 1 year after the last contact
	Legitimate interest	Up to 1 year after collection
Participation in campaigns and competitions	Contract Performance, based on the respective campaign regulations	Up to 1 year after the end of the competition
Loyalty program subscription and management	Contract execution	For the period of membership in the loyalty program
Statistical analysis for marketing purposes, including market segmentation studies.	Legitimate interest	For the data retention period for tax purposes.

6. TECHNICAL, ORGANISATIONAL AND SECURITY MEASURES IMPLEMENTED

To ensure the security and confidentiality of Personal Data, protected databases are used along with appropriate firewalls and passwords, in accordance with the provisions of Data Protection Legislation. Access to Personal Data is only possible to authorized employees who have a legitimate need to use Personal Data, in accordance with the principles of security and confidentiality. Violations of this Privacy Policy by employees of Grupo Vista Alegre may result in disciplinary action. Compliance with the rules and procedures of Grupo Vista Alegre is regularly monitored and verified.

7. USE OF COOKIES

With regard to the processing of Personal Data that Grupo Vista Alegre carries out through the use of cookies, please consult Grupo Vista Alegre's Cookies Policy and customize your settings according to your preferences.

8. THIRD-PARTY TOOLS INTEGRATED INTO THE WEBSITE

On some of our Websites (vistaalegre.com; bordallopinheiro.com; casaalegre.com) there is interaction with the social media platforms Facebook and Instagram via a connection to the servers of these social networks – the Meta Pixel or Conversions API tools. This will allow us to identify which website the User is visiting and may also result in the storage other data, such as the IP address. If you give your consent, the following additional data may also be processed: name, e-mail, telephone contact and city in which you are located.

If the User has their Facebook and/or Instagram session started, data will be associated with their accounts. To prevent this from happening, the User must log out of Facebook and Instagram before visiting the website. The information regarding data processing by these social media is available at:

https://www.facebook.com/about/privacy/

https://help.instagram.com/519522125107875

9. RIGHTS OF DATA SUBJECTS

Under the terms of the current or future Data Protection Legislation, Grupo Vista Alegre informs you that Data Subjects have the right of access, rectification, limitation, portability, erasure and the right to oppose the processing of Personal Data, in certain circumstances, which may be exercised under the terms of this chapter of the Privacy Policy.

Rights	What do they consist of?
Right to information	The Data Subject has the right to obtain clear, transparent and easily understandable information about how Grupo Vista Alegre uses his/her Personal Data and what his/her rights are. It is for this reason

Rights	What do they consist of?
	that Grupo Vista Alegre provides all this information in this Privacy Policy.
Right of access	The Data Subject has the right to obtain information about what Personal Data Grupo Vista Alegre processes (if at all) and certain information (similar to that provided in this Privacy Policy) about how such Data is processed. Grupo Vista Alegre may refuse to provide the requested information whenever; in order to do so, Grupo Vista Alegre has to disclose another person's Personal Data or the information negatively impacts another person's rights.
Right to rectification	If the Data Subject's Personal Data is incorrect or incomplete (for example, if his/her name or address is incorrect), a request may be made to Grupo Vista Alegre to take reasonable steps to correct it.
Right to erasure of Personal Data	This right is also known as the "right to be forgotten" and, in a simple way, it allows the Data Subject to request the erasure or deletion of their data, provided that there are no valid grounds for Grupo Vista Alegre to continue using them or their use is unlawful. This is not a generic right to erasure, as exceptions are allowed (e.g. where such data is necessary for the defence of a right in legal proceedings).
Right to restriction of processing	The Data Subject has the right to "block" or prevent the future use of his/her Data while Grupo Vista Alegre evaluates a request for rectification or as an alternative to erasure. Whenever the Processing is limited, Grupo Vista Alegre may still store your data, but may not use it later. Grupo Vista Alegre keeps a list of data subjects who have requested "blocking" of future use of their data to ensure that this limitation is respected.
Right to portability of Personal Data	The Data Subject has the right to obtain and reuse certain Personal Data for his or her own purposes in various organizations. This right applies only to personal Data that you provide to Grupo Vista Alegre and processed with consent and those processed by automated means.
Right to object	The Data Subject has the right to object to certain types of processing, for reasons related to his/her particular situation, at any time when such processing takes place, for the purposes of the legitimate interest of Grupo Vista Alegre or of third parties. Grupo Vista Alegre may continue to process such Data if it can prove "overriding legitimate reasons for the processing that override your

Rights	What do they consist of?
	interests, rights and freedoms" or if such Data is necessary for the establishment, exercise or defence of a right in a legal proceeding.
Right to lodge a complaint	The Data Subject has the right to lodge a complaint with the competent supervisory authority, the *Comissão Nacional de Proteção de Dados - CNPD* [National Data Protection Commission], if he/she considers that the Processing of Personal Data violates his/her rights and/or the Data Protection Legislation.

If the lawful basis for the processing of your personal data is consent or legitimate interest, you may respectively withdraw consent or oppose processing, at any time, without any consequences arising there from, but without compromising the lawfulness of the processing carried out in the meantime. If consent is withdrawn or if you expressly object, Grupo Vista Alegre will immediately cease processing your personal data for the purpose in question, unless there is a need to process the data for the fulfilment of legal and/or contractual obligations.

You may, at any time, in writing, exercise the rights enshrined in the Data Protection Legislation and other applicable legislation through the means described in Point 10 of this Privacy Policy.

10. HOW TO CONTACT GRUPO VISTA ALEGRE REGARDING PRIVACY AND DATA PROTECTION

Data Subjects may exercise their rights by contacting Grupo Vista Alegre by sending an email to rgpd@vistaalegre.com. Data Subjects may also contact the Personal Data Protection Officer of Grupo Vista Alegre by sending an e-mail to dpo@vistaalegre.com or by letter addressed to the DPO of Grupo Vista Alegre at: Lugar da Vista Alegre, 3830-292 Ílhavo - Portugal.

11. CHANGES TO PRIVACY POLICY

Grupo Vista Alegre reserves the right to change this Privacy Policy at any time. We encourage you to read this document regularly.