

## **PRIVACY POLICY**

This website was developed and is owned by Empathy Talent, Lda., with registered office at Edifício LACS, Rocha Conde de Óbidos, 1350 - 352 Lisboa, which is hereinafter referred to as LACS.

We have adopted procedures to ensure full transparency and clarity with regard to the processing of your personal data.

Therefore, please read this Privacy Policy carefully, because by accessing the website and providing your personal data, you are expressly accepting and declaring that you are aware of the conditions contained herein. In particular, by providing your personal data through the website reservation and contact forms, you acknowledge and agree to its collection and processing in accordance with these rules.

### **What is personal data?**

Personal data is defined as information relating to an identified or identifiable natural person - the data subject. An identifiable person is considered to be one who can be identified, directly or indirectly, in particular by reference to elements such as, for example, a name, an identification number, location data, electronic identifiers or to one or more specific elements of their identity.

### **Who is the data subject?**

Under this policy, the data subject will be the User of the LACS website, [www.lacs.pt](http://www.lacs.pt).

### **Who is the processor of your personal data?**

LACS is the controller of the personal data that you provide to us and is responsible for it in accordance with the applicable law on data protection, having as its purpose the use of the creative cluster also called LACS.

For any contact on this subject you can use the following email: [info@lacs.pt](mailto:info@lacs.pt)

### **What is the processing of personal data?**

The processing of personal data is an operation or set of operations which is performed on personal data or on sets of personal data, by automated or non-automated means, such as collection, recording, organisation, structuring, conservation, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of provision, collating or interconnection, limitation, erasure or destruction.

### **For how long will we keep your data?**

Personal data will be kept for as long as you are an active customer and up to a maximum of 2 (two) years. If we notice that the User does not access emails sent, or the website, for a period of 2 (two) years, for example because no booking was made, we will ask you to review your consent. If you do not renew your consent or say nothing, we will delete your data.

### **Who has access to your data?**

We will never transfer, sell or exchange your data with third parties outside of our company for commercial and marketing purposes. The data available to third parties is only used to provide our services to you. Below you will find the categories of third parties related to each specific process.

### **What is the lawful basis for processing?**

The lawful basis for the processing of data is Regulation (EU) No 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (commonly known as General Data Protection Regulation or GDPR).

### **What are your rights?**

Right of access: You have the right to request, at any time, information about the personal data that we process about you.

Right to rectification: You have the right to request the rectification of your personal data if it is inaccurate, incomplete, or outdated.

Right to data portability: Whenever LACS processes your personal data by automated means, on the basis of consent or performance of a contract, you have the right to request a copy of your personal data, or to require the transfer of it to another entity.

Right to erasure: The right to the erasure of your data will be possible only in the following situations:

- If you do not have any booking or contact request in progress;
- The deletion of your data for direct marketing purposes;

The right to erasure may be restricted or limited by legal, administrative or judicial obligations to which LACS is subject.

You can request the deletion of your data by sending an email to [info@lacs.pt](mailto:info@lacs.pt).

The right to object to the processing: At any time, you have the right to object to the processing of your personal data. In these cases, we will cease processing, except if there are compelling legitimate grounds for this processing that prevail over the interests, rights and freedoms of the data subject, or for the purpose of declaration, exercise or defence of a right in legal proceedings.

The right to restrict processing: The right to restrict the processing of your data will be possible only in relation to direct marketing or when there are no active reservations or contact requests on the website.

The right to complain to a supervisory authority: The User will also have the right to submit complaints to be heard by the supervisory authority which, in the case of Portugal, is the National Commission for Data Protection, whose contacts are available at [www.cnpd.pt](http://www.cnpd.pt).

With the exception of the latter, you may exercise all the rights set out above by communication to the following email: [info@lacs.pt](mailto:info@lacs.pt).

### **What guarantees can we give you?**

That our company will always adopt appropriate technical and organisational security measures to protect the integrity, security and confidentiality of your personal data, taking into consideration advanced techniques of digital storage of data available on the market, reasonably implemented in accordance with the needs and capabilities of our company.

### **Updates to the Privacy Policy:**

LACS reserves the right to make adjustments or amendments to this Policy at any time, and these amendments shall be duly published on the website. The version published on the website is always that which is currently in force.

### **Your personal data is required so that we can provide our services:**

In order to be able to provide our services (e.g., reserve rooms), you will need to provide us with your data, without which we cannot provide our services. So, if you wish to use our services, you cannot oppose the processing of your data. However, you can oppose the use of your data for direct marketing purposes.

### **Specific Processes for Data Processing:**

#### **I. CONTACT REQUEST**

We will use your personal data to contact you, if you so request by filling in the information collection field "Do you want to know about LACS?" or the field "Talk to us", available on our website.

We will use your personal data, provided through the completion of contact forms, for the purposes of booking meeting rooms, as well as to better understand our creative clusters.

We will process personal data about your name, company, address, email address and phone number, city and creative industry.

The data made available to third parties is used only to provide the services referred to above. We use technical software providers to manage user contacts.

## II. DIRECT MARKETING

We will use your personal data to send you marketing offers, satisfaction and quality surveys and invitations by email (newsletter).

To optimise your experience with our company, we will provide you with relevant information, recommend rooms and personalised offers. All these personalised services are based on your previous reservations, the options you clicked and the options you selected.

We will process the following categories of personal data:

- Contact information such as an email address, phone number, address, postcode and company;
- Date of birth (to check your legal age) and sex (optional information).

The data available to third parties is used only to provide the services referred to above. We use media agencies and technical suppliers for the distribution of direct marketing in physical and digital format. We do not transmit, sell or trade your personal data with third parties outside of our company for commercial purposes.

The processing of your personal data is based on your consent, when you agree to receive direct marketing material. If you revoke your consent, our company will no longer be able to send further direct marketing offers or information based on your prior consent.

You may cancel your direct marketing subscription in the following ways:

- By following the instructions in each newsletter sent;
- By sending an email to [info@lacs.pt](mailto:info@lacs.pt).

### III. CUSTOMER SUPPORT

We use your personal data to manage any request, to manage complaints or concerns about the security of the services provided and matters of technical assistance via email, by phone or through social networks. We may also contact you if a problem arises with your request.

We process any information that you provide to us, including the following categories: name, contact information, such as address, email address and telephone number, date of birth, taxpayer identification number, payment information and payment history, information on services requested.

Data provided to third parties is used only to provide the services listed above and will not be shared with any other entity, except in the case of legal action, in which case it will be shared with our legal partners.

### IV. COMPLIANCE WITH LEGAL OBLIGATIONS

We will use your personal data to comply with legal obligations, court judgments and decisions of the authorities.

This includes the use of your personal data to collect and verify accounting data in order to comply with accounting standards. We shall process the following categories of personal data: name, contact information, such as address, email and phone number, amount and dates of reservations.

Your data will be shared within our company and with the competent public authority for the purpose for which they request access. We will also share your personal data with the companies that provide or supply us with accounting solutions.

The processing of your personal data is necessary for our company to meet its legal obligations.