

PRIVACY POLICY

We present the *Blue Smile – Unipessoal, Lda.* Privacy Policy, which informs you of your rights and establishes the mode how we collect and use your personal data.

At *Blue Smile – Unipessoal, Lda.* we are committed to use your data only for clearly clarified purposes, and we have taken a lot of security measures, both technical and organizational, in order to protect the personal data that you provide to us against its dissemination, loss, misuse, alteration, treatment or unauthorized access, as well as against any other form of unlawful treatment.

RESPONSIBLE FOR PERSONAL DATA PROCESSING

Blue Smile – Unipessoal, Lda., headquartered at Rua da Aldeia, 375, Paços de Brandão, 4535-279 Paços de Brandão Vfr, is the entity responsible for the processing of personal data, as it defines which data is collected, the means of processing and the purposes for which the data are used.

Our company is mainly engaged in the rental of light passenger and commercial vehicles without driver, from various brands of car manufacturers.

We advise you to read the privacy policies of these brands, as they may collect autonomously, directly or indirectly, your personal data. You should directly contact your car manufacturer's trademark in relation to any questions regarding the use of your personal data.

DATA PROTECTION OFFICER

Blue Smile – Unipessoal, Lda. does not have a Data Protection Officer (DPO) derived from the nature of its business and the processing of the data that is required for the exercise of such activity.

If you have any questions or complaints, please contact the *Blue Smile – Unipessoal, Lda.* data controller, through the e-mail address *info@bluesmile.pt*.

You also have the right to file a complaint with the National Data Protection Commission (CNPD) regarding the processing of your personal data by *Blue Smile – Unipessoal, Lda.*

PERSONAL DATA, HOLDERS, CATEGORIES AND COLLECTION OF PERSONAL DATA

WHAT IS PERSONAL DATA?

Personal data is any and all information concerning an individual, identified or identifiable. It is considered identifiable an individual who can be identified, directly or indirectly, in particular by reference to an identifier. An identifier may be, for example, the name, identification number, location data, electronic identifiers or one or more specific elements of that individual's physical, physiological, genetic, mental, economic, cultural or social identity.

WHO ARE PERSONAL DATA HOLDERS?

The customer or potential customer, individual, to whom the data relate and who enjoys, or intends to enjoy, the products or services provided by *Blue Smile – Unipessoal, Lda.*

The representative/employee or point of contact in the company, in the case of collective people, in a contract performance, or pre-contractual diligence, celebrated between that company and *Blue Smile – Unipessoal, Lda.*

WHAT CATEGORIES OF PERSONAL DATA ARE TREATED BLUE SMILE – UNIPESSOAL, LDA.?

<i>Identification Data</i>	<i>Examples</i>
<i>Personal and Contact Information</i>	Name, tax or civil identification data, payment details, billing address, date of birth, gender, telephone contact, e-mail address, driving license data. In the case of representatives/ employees of collective people, we only collect the data indispensable for the proper performance of the contract, such as name, e-mail address and telephone contact;
<i>Service</i>	Products purchased or services purchased;
<i>Profile and interests</i>	Interests in the products or services provided by <i>Blue Smile – Unipessoal, Lda.</i> ;
<i>Customer History</i>	Customer satisfaction ratio and response to satisfaction survey; offers received; Rented car(s), including model information, model configuration, rental date(s), check-out and check-in dates, rentals; campaign history response history; participation in events; history of complaints; among other situations and recurring issues of rent-a-car activity.

HOW AND WHEN IS YOUR PERSONAL INFORMATION COLLECTED?

Your personal data may be collected under the following circumstances:

1 - For the purpose of celebration and contract execution, namely when renting us a product or purchasing a service from us;

2 - Through the *Blue Smile – Unipessoal, Lda.* website when you fill out the following forms, namely:

2.1 - When booking a particular car group, we mean a reserved or similar car, namely in steps no. 4 (Personal Data) and no. 5 (Payment);

2.2 - On the page "Contact Us";

2.3 - When you subscribe the sending of our newsletters, giving us your consent;

3 - In the event that you wish to make a car booking request;

4 - When you go to one of our Customer Service spaces, as a potential customer, and by express consent you provide us with your personal data;

5 - When you participate in events organized by *Blue Smile – Unipessoal, Lda.*, or by the brands/companies with which we collaborate, and with express consent you provide us with your personal data.

BACKGROUND, PURPOSE AND DURATION OF THE PERSONAL DATA PROCESSING

The reasons that legitimize the processing of your personal data by *Blue Smile – Unipessoal, Lda.* are the following:

- ✓ Consent: Your personal data may be processed by express, free, specific, informed and explicit expression of consent, whereby you accept, by means of an unambiguous positive statement or act, that your personal data are processed by the Communication Proposal for data processing by *Blue Smile – Unipessoal, Lda.*
- ✓ Pre-contractual diligences and/or contract performance: your personal data may be needed to clarify doubts, to present you a proposal, for the celebration, execution and management of the contract with *Blue Smile – Unipessoal, Lda.*;
- ✓ Compliance with legal obligation: your data may be required to comply with a legal obligation to which the controller, in this case *Blue Smile – Unipessoal, Lda.* is subject.
- ✓ Legitimate interest: Your data may be required to perform certain tasks related to *Blue Smile – Unipessoal, Lda.* business activity, except the case where your privacy and data protection rights should prevail.

Thus, *Blue Smile – Unipessoal, Lda.* will process your personal data, according to the following:

Legal basis	Purposes
Consent	We treat customers personal data, and potential customers, with consent, for business and marketing purposes, including: marketing campaigns, events, promotions, new product information, satisfaction surveys of services provided by <i>Blue Smile – Unipessoal, Lda.</i> and within the follow up of the sale and rent.

<p>Pre-contractual diligences and/ or contract performance</p>	<p>We process personal data for the purpose of celebration, executing and managing of the contract celebrated between the customer and <i>Blue Smile – Unipessoal, Lda.</i>, namely for the preparation of proposal and contract; in the context of a complaint; for the workshop service marking; in buying auto parts.</p>
<p>Compliance with legal obligation</p>	<p>When processing is required to comply with legal obligations, your personal data will be transmitted to law enforcement and tax authorities, for example for billing purposes, for the car registration process; driver identification within the notification(s) resulting in the imposition of a fine (s); response and resolution of any complaints registered in the Complaints Book.</p>
<p>Legitimate interest</p>	<p>We treat personal data based on legitimate interest, namely for business monitoring and management; in the context of customer contact request via website and social networks; respond to complaints made through third parties of which <i>Blue Smile – Unipessoal, Lda.</i> markets and also, response to requests/ complaints made through the complaint portal/ DECO or through direct contact with <i>Blue Smile – Unipessoal, Lda.</i>; when we need to contact the representative of a legal person when performing a contract or pre-contractual diligence.</p>

Blue Smile – Unipessoal, Lda., if the customer is a legal person, in order to fulfill their contractual obligations, needs to collect some personal data (i.e.: name, e-mail address, telephone contact and all other data relating to the performance of a rental) of the representative or employee of that company, for the sole purpose of enabling the proper performance of that contract.

In this case, the legal person customer must ensure that the data collected from its representatives/collaborators is collected and transmitted to *Blue Smile – Unipessoal, Lda.* in a lawful manner (under one of the legal grounds provided for in the applicable law), and should give the holders of personal data, their representatives or collaborators, the right to information on the processing of such data.

STATEMENT OF PERSONAL DATA

Blue Smile – Unipessoal, Lda. retains the personal data of the holders only for the period strictly necessary for the purpose for which they were collected.

In certain cases, the law requires data retention for a specific period, in particular for data required for information to the Tax Authority, which will be retained for 10 years, in accordance with current legislation.

We will also keep your data for as long as you have a contractual relationship with *Blue Smile – Unipessoal, Lda.* However, we may keep your personal data for longer than the duration of the contract, based on your consent, to ensure rights and duties related to the contract or in situations where there is a legitimate interest of *Blue Smile – Unipessoal, Lda.*, always respecting the period necessary for the purpose for which they were collected. If there is no specific legal obligation, your data will be processed only for the period necessary for the fulfillment of the purposes that motivated its collection, and as long as there are legitimate grounds to be retained by *Blue Smile – Unipessoal, Lda.* As a rule, your personal data, when processed for marketing and sale purposes, will be retained for a maximum of 3 years from your consent or last contact (whichever is later) and if, within this period, you have not withdrawn your consent.

Once the maximum retention period has been reached, the personal data will be irreversibly anonymised (the anonymized data may be retained) or be securely destroyed.

TRANSMISSION OF YOUR PERSONAL DATA

Blue Smile – Unipessoal, Lda. only transmits your personal data when necessary for the purposes described above, namely for the provision of services requested by you.

The suppliers and/or service providers from *Blue Smile – Unipessoal, Lda.* are contractually subject to the same terms and conditions for the processing of personal data, and they are prohibited from using, transferring, disclosing or recording the personal data of the holder to any purpose other than that for which they were specifically contracted (or without your consent, as applicable).

Blue Smile – Unipessoal, Lda. may transmit your personal data, depending on the purpose for which it was collected, to the following categories of recipients: insurance entities, brokers/mediators, when requested by you and only the data necessary for the development of an activity pursued by these entities will be transmitted.

Your personal data may also be transmitted to entities to whom the data must be communicated by law, such as the tax authority or judicial authority.

Also, and with your consent, your personal data may be transmitted to companies and/or brands worked by *Blue Smile – Unipessoal, Lda.*

LINKS TO OTHER WEBSITES

Please be advised that *Blue Smile – Unipessoal, Lda.* is not responsible for the privacy practices of third parties whose websites link to our website and cannot guarantee the accuracy or authenticity of the information contained therein. We advise you to read the privacy policies of any other website that is linked to the *Blue Smile – Unipessoal, Lda.* website.

RIGHTS OF THE PERSONAL DATA HOLDERS AND RESPONSE TO THE HOLDERS 'REQUESTS

Blue Smile – Unipessoal, Lda. guarantees the applicability and fulfillment of all the rights of the personal data holder provided for in the General Data Protection Regulation and in the national legislation in force.

RIGHT OF ACCESS

You have the right to obtain from *Blue Smile – Unipessoal, Lda.*, the confirmation that the personal data concerning you is processed or not, and if appropriate, the right to access your personal data and to the information concerning the same treatment, for example, you may require an exact copy of your compilation and request additional information about the treatment we perform.

RETIFICATION RIGHT

You also have the right to obtain, without justifiable delay, from *Blue Smile – Unipessoal, Lda.* the rectification of inaccurate personal data concerning you, including the right to correct or complete your personal data.

RIGHT TO DELETE DATA (“RIGHT TO BE FORGOTTEN”)

You may exercise the right to obtain the delete of your personal data by *Blue Smile – Unipessoal, Lda.*, and without undue delay, provided that: the data is no longer necessary for the purpose that motivated your processing; when you withdraw your consent and there is no other valid grounds for its conservation; when it opposes the treatment and there are no prevailing legitimate interests on the part of *Blue Smile – Unipessoal, Lda.*, as well as in other legally provided cases.

DATA PORTABILITY RIGHT

You have the right to receive the personal data concerning you that you have

provided to *Blue Smile – Unipessoal, Lda.*, in a structured, common use and automatic reading format, as well as the right to transmit such data to another controller (if technically possible), and if the treatment is based on a consent or in a contract, and if the treatment is carried out by automated means.

RIGHT TO WITHDRAW CONSENT

You may at any time change your consent, limit it to certain types of treatment or withdraw it, however, withdrawal of consent does not compromise the lawfulness of the treatment based on prior consent.

OPPOSITION RIGHT

You may also oppose, at any time, the processing of personal data concerning you, when there are no compelling and legitimate reasons for the processing of your personal interests, rights and freedoms, or for the purpose of declaration, exercise or defense of a right in judicial proceedings.

It should also be added that you have the right at any time to object to the processing of your data for direct marketing purposes. In this case, *Blue Smile – Unipessoal, Lda.* undertakes to cease processing of data for such purpose.

RIGHT TO TREATMENT LIMITATION

In certain situations you have the right to obtain from *Blue Smile – Unipessoal, Lda.* the limitation of your data processing, in particular if you dispute the accuracy of personal data during a period that allows *Blue Smile – Unipessoal, Lda.* to verify its accuracy, in cases where the data is no longer necessary for the purposes of processing, but it is still required by the holder for the purpose of declaring, exercising or defending a right in the court proceedings, and even when opposing the processing until it is found that the grounds for *Blue Smile – Unipessoal, Lda.* legitimate interest take precedence over yours, as well as in other legally provided

cases.

RIGHT NOT TO BE SUBJECT TO ANY AUTOMATED DECISION

You have the right not to be subject to any decision made solely on the basis of automated processing, including profiling, which has effects in your legal sphere or which significantly affects you in a similar way.

EXERCISE OF YOUR RIGHTS

You may exercise your rights for free, except in the case of a manifestly unfounded or excessive request, in which case a reasonable fee may be charged for the costs.

We will respond to your requests within 30 days, except for the most complex requests. In fact, you can exercise your rights through the email info@bluesime.pt.

Still, and if you are not satisfied with our response after exercising of any of these rights, you have the right to file a complaint with the CNPD.

PROCEDURAL AND TECHNICAL SAFETY MEASURES

Blue Smile – Unipessoal, Lda. makes use of appropriate physical, technological, organizational and security measures to protect your personal data in order to protect the personal data made available to us against its dissemination, loss, misuse, alteration, processing or unauthorized access as well as against any other form of unlawful treatment.

COOKIES

You can consult our Cookie Policy.

PRIVACY POLICY UPDATE

Blue Smile – Unipessoal, Lda. reserves the right at any time to update this PrivacyPolicy. Therefore, it is recommended to check this policy periodically on our website in order to stay informed about the processing of your personal data. Notwithstanding the consultation of this policy on our website, *Blue Smile – Unipessoal, Lda.* will inform you of the changes made through the various communication channels used and selected by you.

Privacy Policy was last updated on February 15th of 2023 at 06:57 p.m.