

About us

Acacia Point was established in 2014 and is an independently owned, European-focussed, real estate investment and asset management company.

Our commitment

The protection of privacy and personal data is a fundamental commitment of ACACIA POINT CAPITAL ADVISORS to the holders of personal data that use our products and our services.

In this policy we explain what categories of personal data we collect for what purposes and how we treat them, with whom we share them, how long we retain them, the principles we respect, how we contact and exercise their rights.

General Regulation on Data Protection

The GDPR lays down the principles and rules concerning the processing by a person, company or organization of personal data relating to persons in the European Union.

GDPR protects personal data irrespective of the technology used for processing such data, protection is technologically neutral, and applies to both automated and manual processing, provided the data is organized according to predefined criteria (for example, in alphabetical order). Also irrelevant is the way data is stored, in a computer system, via video surveillance, or on paper; in all these cases, personal data are subject to the protection requirements of the GDPR.

What is personal data?

Personal Data is any information of any nature and in any medium relating to an identified or identifiable natural person. Any identifiable person, directly or indirectly, identified by reference to a name, identification number, location data, identifiers by electronic means or one or more specific elements of his or her physical, physiological, genetic, mental, economic, cultural or social.

Who owns the personal data?

The owners of personal data are the natural persons to whom the data relates and who intend to use or have used the products and services of ACACIA POINT CAPITAL ADVISORS, or who collaborate directly or indirectly with ACACIA POINT CAPITAL ADVISORS in the scope of our activity, are users of our websites, are buyers of our properties, are clients and their companions who use our tourist accommodations, are clients or interlocutors of our partners, employees or service providers and job seekers.

ACACIA POINT CAPITAL ADVISORS may collect data from minors and other accompanying persons holding reservation of tourist accommodation in compliance with the legislation in force regarding the control of foreign citizens in the national territory.

Categories of personal data

ACACIA POINT CAPITAL ADVISORS addresses a number of categories of data necessary for the purposes and ensuring compliance with the **Data Minimization Principle**, including contact details, identification data, address, tax data, bank and credit card data and also the professional data of its

employees, service providers and job seekers, images of people and goods that are in our offices for security purposes (video surveillance).

What is the processing of personal data?

The processing of personal data consists of an operation or set of operations carried out on personal data or personal data sets, by automated means or not, namely collection, registration, organization, structuring, preservation, adaptation, retrieval, consultation, use, disclosure, dissemination, comparison, interconnection, limitation, erasure or destruction

The Principles of Data Protection

All personal data processing at ACACIA POINT CAPITAL ADVISORS is conducted in accordance with the principles of data protection as established by the RGPD. ACACIA POINT CAPITAL ADVISORS's policies, processes, procedures and records are designed to ensure compliance with the principles.

Principle of Legality, Loyalty and Transparency

- We always identify a legal basis, pre-contractual at the request of the data subject, contractual in which the data subject is a party, legitimate interest or when not applicable, consent of the data subject and when the data subject is a child below 16 years or unenforceable, the holder of the parental responsibility or of the guardianship will be asked to sign the consent;
- We provide Privacy Notices to data holders who will provide more detailed information on ACACIA POINT CAPITAL ADVISORS data processing.

Principle of Limitation of Purposes

Data are collected for specific, explicit and legitimate purposes and are not subsequently processed in a manner incompatible with those purposes.

Principle of Data Minimization

The data collected and processed are adequate, relevant and limited to what is necessary having regard to the purposes.

Principle of Accuracy

Appropriate measures have been taken to ensure that inaccurate data, considering the purposes for which they are processed, are erased or rectified without delay, and the data subject can exercise his right to rectification at any time.

Principle of Conservation Limitation

The data are stored in a way that allows the data subjects to be identified only for the period necessary for the purposes for which they are processed and in compliance with the regulations and legislation in force.

Principle of Integrity and Confidentiality

ACACIA POINT CAPITAL ADVISORS makes reasonable efforts to ensure that the data is processed in a way that guarantees its safety, protects it from unauthorized or unlawful processing and from accidental loss, destruction or damage.

Principle of Responsibility

ACACIA POINT CAPITAL ADVISORS is able to demonstrate in a responsible manner its commitment to the principles of the RGPD. ACACIA POINT CAPITAL ADVISORS implemented policies, processes and procedures for data protection, inventory personal data and treatments performed on them, took measures to raise awareness of its employees and service providers, obtained the commitment of these and its subcontractors to privacy, is prepared to respond to data subjects' concerns in the exercise of their rights, takes into account privacy in the design of new services, assesses the risk of potentially resulting treatments, and has data breach notification procedures and response plans to incidents.

Who is responsible for the treatment?

The person responsible for the collection and processing of your personal data will be ACACIA POINT CAPITAL ADVISORS who provides you with the service or provides the product and in that scope decides what data collected, means of processing and purposes for which the data is used.

Legal basis for the treatment

Consent: Your consent must be expressed in writing or through the validation of an option - and prior, provided in a free, informed, specific and unambiguous manner.

Examples of your consent to ACACIA POINT CAPITAL ADVISORS are to register applications through our websites, customer loyalty actions and corporate events, or to make recommendations or send marketing messages.

Execution of contract or pre-contractual procedures: when the processing of personal data is necessary to propose our products or services and to fulfil the obligations assumed by ACACIA POINT CAPITAL ADVISORS in contracting the supply of these products or services. Compliance with a legal obligation: when the processing of personal data is necessary to fulfil a legal obligation to which ACACIA POINT CAPITAL ADVISORS is subject, such as the Commercial Code, the Tax Code, the Labour Code or the Civil Code. Legitimate interests: the processing of personal data by ACACIA POINT CAPITAL ADVISORS may be justified on grounds of legitimate interest related to the execution of its activities as a company, such as the geolocation of the fleet of vehicles in a labour context, the monitoring of the computer media and the Internet, the control of assiduity of its employees by biometric system, the video surveillance of our office for the security of people and goods.

Purposes of treatment

ACACIA POINT CAPITAL ADVISORS treats personal data for the purposes of promotion, commercialization and contracting of its properties, the management of projects for the rehabilitation of these properties, the management of the necessary means to achieve such the management of partnerships, human resources, its employees and service providers and the necessary infrastructures.

Duration of treatment

Your personal data are treated by ACACIA POINT CAPITAL ADVISORS only for the period of time necessary to achieve the defined purpose or, depending on the applicable, until you exercise your right of opposition, right to be forgotten or withdraw consent.

ACACIA POINT CAPITAL ADVISORS will, after the expiration of its period of validity, eliminate or anonymize the data whenever they are not to be kept for a purpose other than that which may last.

Transmission of your personal data

Personal data may be transmitted to subcontractors for processing in the name and on behalf of ACACIA POINT CAPITAL ADVISORS. In this case, ACACIA POINT CAPITAL ADVISORS takes the necessary contractual measures to ensure that subcontractors respect and protect the personal data of the holder.

Data may also be transmitted to third parties - entities other than ACACIA POINT CAPITAL ADVISORS or subcontractors – such as companies with which ACACIA POINT CAPITAL ADVISORS develops partnerships, if the holder has consented - or entities to whom the data must be communicated by law, such as the Tax Authority, the Aliens and Borders Service, judicial authorities, criminal police agencies, among others.

Cookies

A cookie is a small amount of text sent to your browser by a website you visit. This helps the website to remember information about your visit and other settings, so that we can provide you with a next visit easier and more useful.

We use cookies for different purposes:

Technical Cookies: We use technical cookies to display our websites, so that it works properly, allowing you to provide you with an advanced and user-friendly website.

Functional Cookies: We also use these cookies to remind you of your preferences and to help you use our websites more efficiently.

Analytic Cookies: We use analytic cookies to help us understand how visitors engage with the website.

You can use a set of cookies to collect information and disseminate website usage statistics without personally identifying individual visitors. This means that we can find out what works best for improving our website.

Regarding the use and processing of personal data of ACACIA POINT CAPITAL ADVISORS digital platforms, please consult our Cookies Policy.

Personal data holder Which are they?

The holder of personal data has rights to information, access and rectification or erasure of personal data and the right to portability of data, the right to limit or oppose the treatment of their data, under the terms of the RGPD and other applicable legislation.

The holder may withdraw, at any time, the consent that he has given for the processing of his personal data, within the framework of the RGPD. The revocation of consent shall not affect the lawfulness of the processing of personal data hitherto made, based on the consent you have previously provided. You also have the right to submit a complaint regarding the processing of your data to the CNPD-National Commission for Data Protection on its website - www.cnpd.pt (RGPD Notifications).

Mode of use?

E-mail: vida@quintadafonte.com

Letter:

ACACIA POINT CAPITAL ADVISORS
Quinta da Fonte, Q56 Level 2, Rua dos Malhões,5
2770-071 Paço de Arcos, Lisbon, Portugal

The exercise of rights is free of charge, except in the case of a manifestly unfounded or excessive or unjustifiably reiterated request, in which case a reasonable fee may be charged against costs.

Replies to requests shall be made without undue delay within 30 days of receipt of the request, unless it is a particularly complex request or occurs in exceptional circumstances. That period may be extended by up to one month, where necessary, taking into account the complexity of the request and the number of applications received.

In the context of your request, you may be asked to prove your identity so as to ensure that the sharing of personal data is only done with its owner.

Security measures

ACACIA POINT CAPITAL ADVISORS takes all necessary and legally required technical and organizational precautions to ensure the privacy of personal data processed and / or transmitted through its digital platforms. These precautions ensure online and offline security of this information.

Doubts

If you have any questions about any of the topics addressed in this document, please contact us:

E-mail: vida@quintadafonte.com

Letter:

ACACIA POINT CAPITAL ADVISORS
Quinta da Fonte, Q56 Level 2, Rua dos Malhões,5
2770-071 Paço de Arcos, Lisbon, Portugal