

Scope

Blueticket is committed to protecting the personal data entrusted to it, ensuring that it is processed in a rigorous and transparent manner.

Therefore, within the scope of this commitment, the purpose of this privacy policy ('**Policy**') is to disclose how personal data provided when using the blueticket.meo.pt website ('**Website**'), its Reserved Area, and the MeoBlueticket application ('**MeoBlueticket App**') is processed. The Website and the MeoBlueticket App are collectively referred to as '**Digital Channels**'.

The provision of personal data when using the Digital Channels implies knowledge and express acceptance of the provisions of this Policy. Accordingly, users ('**Users**' or, in the singular, '**User**') should read the Policy carefully and decide freely and voluntarily whether or not they wish to use the Digital Channels.

The User hereby declares and guarantees that they are of legal age and that the data provided in connection with their use of the Digital Channels is true, accurate, complete and up to date, and that they are responsible for any non-compliance. Whenever the data provided belongs to a third party, the User guarantees that they have informed that third party of the conditions set out in this document and that they have obtained their authorisation to provide their data for the purposes indicated herein.

We recommend that you read this Policy together with our **Cookie Policy** and **General Conditions**.

1. Data Controller

This Policy regulates the processing of personal data collected in the context of the User's interactions with Blueticket – Serviços de Bilhética SA., with registered office at Rossio dos Olivais, lote 2.13.01A, 1990-231 Lisbon and with company registration number 508668050 ('Blueticket'), in its capacity as the website manager, and as the entity responsible for the processing of personal data, which is responsible for defining what data to collect, the purposes for which it is used and the means of processing to be applied,



in accordance with the General Data Protection Regulation ('**GDPR**') and other applicable legislation on the protection of personal data ('**Data Protection Legislation**').

2. Processing and collection of personal data

The personal data we collect, as well as how it is collected, may vary depending on the nature of your interactions with the Digital Channels.

Access and browsing do not necessarily imply the provision of personal data. However, there are certain features that require the provision of personal data (e.g. online purchase of tickets for events, subscription to the newsletter or submission of contact forms by the User).

The Website may also include links to other websites that are not related to Blueticket. These links are provided in good faith, and Blueticket cannot be held responsible for the collection and processing of personal data carried out through these websites and does not assume any responsibility for them, namely regarding the accuracy of the information and features available on the websites.

2.1. Personal data processed within the Reserved Area and the MeoBlueticket App

The features available in the Reserved Area of the Website and in the MeoBlueticket App include the purchase and booking of tickets for shows, cultural, sporting and entertainment events, the consultation of purchased tickets and their details, the management of orders and payment methods, as well as access to purchase history. Users can also view detailed information about events, artists, venues and schedules, save events as favourites and receive personalised notifications, where applicable.

To register and access the Reserved Area on the Website and the MeoBlueticket App, the User must provide the following personal data: email address, name, mobile phone number and password. The data requested on the registration form is necessary to create an account in the Reserved Area and to access



features such as (i) purchasing or booking tickets; (ii) viewing purchase and booking history; (iii) managing billing information; and (iv) managing preferences and setting favourites.

In addition, the User may, optionally, enter other personal data in the Reserved Area, namely their date of birth and interests, in order to personalise their browsing experience and enjoyment of the services provided by Blueticket.

2.2. Personal data processed within the scope of the Website

Users are given the option of submitting contact forms, namely for clarifying doubts and submitting requests for information. The forms request the following personal data: name and email address, which are mandatory and without which it is not possible to respond to the requests submitted. In the institutional contact form, the type of contact in question must also be indicated.

These forms also include free text fields where the User can explain the subject and content of their message and provide other personal data on a voluntary basis. In these fields, the User should only provide information that is strictly necessary for the subject or request, refraining, as far as possible, from providing sensitive data or data relating to third parties, for example.

3. Purposes and legal basis for processing

The User's personal data may be processed for the purpose of following up and responding to contacts made, including questions, suggestions or requests for information submitted. This processing takes place within the scope of the execution of a contract entered into, pre-contractual steps requested by the User, or based on Blueticket's legitimate interest in maintaining contact with the User and responding to their requests.

Additionally, in the context of the Reserved Area, the User's personal data may be processed within the scope of the execution of the contract entered into, namely for the provision of the services defined in the



<u>General Conditions</u>, previously accepted by the User when creating the account. Examples of such processing include the management of ticket purchase orders and reservations through the Website, the presentation of the range of events available, the sending of service communications (such as ticket purchase or reservation confirmations), issuing and personalising tickets and managing deliveries, sending communications relating to the event for which tickets have been purchased and related information, and providing after-sales services. In order to guarantee the availability of tickets, it may be necessary to send an SMS message to the telephone number identified, provided and validated by the User.

The User's personal data may also be processed for the purposes of issuing invoices, complying with legal obligations of a fiscal and accounting nature, as well as for the purposes of fraud prevention, detection and control.

If you subscribe to the Newsletter and give your prior, free, specific, informed and explicit consent, Blueticket may send you commercial and promotional communications relating to events via the contact details provided (namely, email, SMS or notifications on the app). In addition, and also with consent, whenever necessary to ensure that such communications are in line with the User's interests, Blueticket may analyse their consumption preferences by processing the following data and categories of personal data: ticket purchase and booking history, gender, age, district and location.

4. Retention of personal data

Personal data will only be kept for as long as necessary for the purposes for which it is processed, unless the right to object or to erasure is exercised within the legal limits.

Exceptionally, data may be kept for longer periods, particularly in cases where there is a specific legal requirement, for the exercise of a right in legal proceedings or for archiving purposes in the public interest, with Blueticket applying the appropriate technical and organisational measures for this purpose.



5. Sharing of personal data

In certain cases, personal data may be transmitted to subcontractors who process personal data on behalf of Blueticket and in accordance with its instructions (e.g. IT service providers, Digital Channel maintenance service providers, marketing and advertising companies, legal and accounting services, logistical support, document management, event promoters and payment service providers for the completion of transactions carried out through the Website), which adopt appropriate technical and organisational measures to ensure the protection of personal data.

Blueticket may also transmit personal data to other entities, such as Arena Atlântico, which will process it as data controller, when necessary for the purposes described above and for other internal administrative purposes.

Finally, Blueticket may also communicate Users' personal data to other third parties, provided that the transmission is carried out in compliance with a legal obligation, a court order, a decision of the National Data Protection Commission or another relevant supervisory authority, or to respond to requests from public or government authorities.

6. Data transfers to third countries

Blueticket has chosen servers located in the European Economic Area ('**EEA**') to support and operate the Digital Channels, thereby ensuring that data processing takes place within the EEA.

However, in exceptional cases, the processing of data for the purposes indicated may involve its transfer to entities established in third countries, i.e. outside the EEA. Users' personal data will be transferred when there is an adequacy decision by the European Commission in relation to a particular country or when the appropriate safeguards provided for in the GDPR are implemented, namely the conclusion of standard data protection clauses adopted by the European Commission and the adoption of additional measures



to ensure that personal data enjoy a level of protection essentially equivalent to that existing in the European Union. Exceptionally, data may also be transferred on the basis of the derogations provided for in Article 49 of the GDPR, such as the User's explicit consent to the transfer.

Browsing the Digital Channels may also involve the transfer of your personal data collected through cookies or similar tracking technologies to third countries located outside the EEA (e.g. to the United States of America). In such cases, Blueticket may not be able to configure the operation of these cookies or similar technologies and/or prevent such transfer.

For more information on the use of these *cookies*, please refer to our <u>Cookie Policy</u>.

To request further information on the safeguards adopted for data transfers, you can use the contact details provided in section 10. 'How to contact us'.

7. Cookies

Digital Channels use *cookies* and similar tracking technologies. For more information, please visit our <u>Cookie Policy.</u>

8. Security

Blueticket respects best practices in the field of security and personal data protection, and has adopted the necessary technical and organisational measures to comply with Data Protection Legislation at all times.

Blueticket makes every effort to protect Users' personal data against unauthorised access via the internet. To this end, it uses security systems, rules and other procedures to ensure the protection of personal data and prevent unauthorised access to data, its misuse, disclosure, loss or destruction. In this regard, for



example, personal data collection forms require encrypted browser sessions and all personal data is stored securely on Blueticket's systems.

Notwithstanding the security measures adopted, Blueticket warns that when data is circulated on an open internet network, it is not possible to completely eliminate the risk of unauthorised access and use, and therefore the User must implement appropriate security measures when using the Digital Channels (namely, ensuring that you use a device and browser that are up to date in terms of security patches and that they are properly configured and protected against harmful software, computer viruses and worms, with an active firewall, antivirus and anti-spyware, ensuring the authenticity of the websites you visit on the internet and avoiding websites whose reputation you do not trust). Without these, the risk of personal data and passwords being accessed by unauthorised third parties is increased.

If you detect any defect, *bug* or anomaly in the Digital Channels, the User must immediately notify Blueticket and not attempt to access commercial or sensitive information, personal data of other Users, alter the characteristics of the Digital Channels or, in any other way, exploit the defect, bug or anomaly to use the Digital Channels in an irregular, unlawful manner or in a manner other than that designed or authorised by Blueticket.

9. Rights of data subjects

Data subjects may exercise the rights listed below in accordance with the law. To do so, they must submit their request using the contact details provided in section 10, '**How to contact us**'.

Without prejudice to any other administrative or judicial remedy, the data subject also has the right to lodge a complaint with the National Data Protection Commission or another competent supervisory authority under the law if they consider that the processing of their data violates the provisions of the law in force.



RIGHTS OF THE DATA SUBJECT

Right of access

Obtain confirmation that personal data is being processed about you, request access to it, obtain information about the processing, and obtain a copy of the personal data being processed. In this case, Blueticket reserves the right to charge a reasonable fee taking into account the administrative costs involved.

Right to rectification or updating

Request the rectification or updating of your personal data that is inaccurate or has changed since the time of collection, or request that incomplete personal data be completed.

Right to erasure

Obtain the erasure of your personal data, including any links, copies or reproductions of such data, in particular if your personal data are no longer necessary for the purpose for which they were collected or processed, or if you object to the processing and there are no overriding legitimate interests that justify it, and provided that there are no valid grounds for its retention.

Right to restriction of processing

Request the restriction of the processing of your personal data in certain cases, namely if the processing is unlawful and you oppose the erasure of the data, requesting the suspension of the processing or the restriction of the scope of the processing to certain categories of data or processing purposes.

Right to portability



RIGHTS OF THE DATA SUBJECT

Receive the data you have provided to us in a commonly used and machine-readable format or request the direct transmission of your data to another entity that will become the new data controller, if the processing of your data is carried out by automated means and is based on your consent or the performance of a contract.

Right to object

Object, at any time, (i) on grounds relating to your particular situation, to the processing of your data based on the pursuit of the legitimate interests of the data controller or on the compatibility of the initial processing with the subsequent processing of such data, including profiling; and (ii) to the processing of your data for direct marketing purposes, including profiling for such purposes.

Right to withdraw consent

Withdraw your consent to the processing of data legitimised on this basis. Withdrawal of consent does not invalidate the processing carried out up to that point based on the consent previously given.

10. How to contact us

Blueticket has appointed a Data Protection Officer ("**DPO**").

For more information about the processing of your personal data, as well as to ask questions or send suggestions related to this Policy, you can do so using the following contact details:

- Postal Address: Rossio dos Olivais, lote 2.13.01A, 1990-231 Lisboa;
- <u>Email:</u> dados@blueticket.pt.



11. Changes to this Policy

Blueticket may, at any time and without prior notice, make adjustments or changes to this Policy, which will be duly publicised on the Digital Channels (for example, through the display of a *banner* or a *pop-up*) and/or on other channels that Blueticket deems appropriate, whenever justified.

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