

# LUSITANO HERITAGE — PRIVACY POLICY

*(Proezas Diárias Lda — Primary Data Controller)*

**Last updated: December 2025**

This Privacy Policy explains how **Proezas Diárias Lda**, trading as **Lusitano Heritage**, collects, uses, stores, and protects your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

By using our website, booking a retreat, making a purchase, or interacting with our services, you agree to the practices described in this policy.

## 1. WHO WE ARE

### Primary Data Controller (GDPR Article 4(7))

**Proezas Diárias Lda**

NIPC: **513940685**

Registered Address:

Praceta Dr. Eduardo Vieira de Mascarenhas 3, R/C Dto

2640–800 Mafra, Portugal

Email: [info@lusitanoheritage.com](mailto:info@lusitanoheritage.com)

### Joint/Secondary Data Controller

**Lusitano Heritage Group Ltd**

(Registered office address will be updated upon completion of incorporation documents.)

Both entities operate under the brand **Lusitano Heritage**.

## 2. WHAT DATA WE COLLECT

We may collect the following categories of personal data:

### 2.1 Data you provide directly

- Name
- Email address
- Phone number
- Address
- Riding experience
- Health or dietary information relevant to retreats

- Payment information (processed securely by Stripe or WeTravel)
- Messages or enquiries sent through our forms
- Newsletter subscription information

## **2.2 Automatically collected data**

- IP address
- Browser type
- Device information
- Pages visited
- Time on site
- Cookies (see Cookie Policy)

Collected via:

- **Google Analytics 4**
- **WordPress cookies**
- **WeTravel analytics**
- **Ecwid/Shopify performance cookies**

## **2.3 Special category data (GDPR Article 9)**

For retreat safety we may collect:

- Relevant health restrictions
- Dietary requirements
- Emergency contacts

We only collect this with **explicit consent**.

## **3. LEGAL BASES FOR PROCESSING (GDPR Article 6)**

We process your data based on:

### **✓ Contractual necessity**

For: bookings, payments, communication, retreat participation.

### **✓ Legitimate interests**

For: site analytics, fraud prevention, service improvement.

### ✓ **Legal obligations**

For: accounting, invoices, safety documentation.

### ✓ **Explicit consent**

For: newsletters, promotional materials, wellness/health information.

You may withdraw consent at any time by contacting us.

## **4. WHY WE COLLECT YOUR DATA**

We use your data to:

- Process retreat bookings & payments
- Manage scheduling and safety
- Provide customer support
- Send retreat information & updates
- Deliver newsletters (if subscribed)
- Improve website performance
- Ensure horse, guest, and staff safety
- Comply with legal and accounting requirements

## **5. THIRD-PARTY DATA PROCESSORS**

We use trusted partners to operate our business. They process data strictly on our behalf.

### **5.1 Essential Processors**

- **WeTravel** – retreat bookings & payment processing
- **Stripe** – secure online payments
- **Mailchimp** – newsletters & automated emails
- **Google Analytics 4** – anonymised analytics
- **Ecwid (current shop)** – ecommerce platform
- **Shopify (future shop)** – ecommerce platform

## 5.2 Hosting & Infrastructure

- Website hosting via WordPress servers
- Email servers (hosting provider)

All third-party processors comply with GDPR and provide appropriate data protection safeguards.

## 6. DATA SHARING

We **never** sell your data.

We only share data:

- With service providers listed above
- When legally required (e.g., tax authority, law enforcement)
- When necessary for retreat safety (e.g., emergency contact)

## 7. INTERNATIONAL DATA TRANSFERS

Some processors (e.g., Mailchimp, Stripe) store data outside the EU.

Where this occurs, transfers are protected by:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- GDPR-compliant safeguards

## 8. DATA RETENTION

We keep your data only for as long as necessary:

- Booking & payment information: **7 years**
- Retreat safety information: **12 months after retreat**
- Accident or incident reports: **10 years**
- Newsletter data: **until you unsubscribe**
- Analytics data: **26 months**

Full schedule in Appendix.

## 9. YOUR RIGHTS (GDPR Articles 12–23)

You may request:

- Access to your data
- Correction of inaccurate data
- Deletion of your data (“right to be forgotten”)
- Restriction of processing
- Portability of data
- Objection to processing
- Withdrawal of consent

To exercise these rights, contact:

**info@lusitanoheritage.com**

You also have the right to lodge a complaint with the **Portuguese Data Protection Authority (CNPD)**.

## 10. SECURITY MEASURES

We protect your data by:

- SSL-encrypted website
- Secure payment gateways (WeTravel/Stripe)
- Access controls
- Staff confidentiality requirements
- Encrypted storage of sensitive data
- Minimisation of data kept

## 11. LINKS TO OTHER SITES

We cannot control the privacy practices of external websites linked from ours.

## 12. POLICY UPDATES

We may update this Privacy Policy periodically.

All updates will be posted on this page with a new “Last Updated” date.

## 13. CONTACT INFORMATION

For privacy questions or GDPR requests:  
**info@lusitanoheritage.com**

Proezas Diárias Lda  
Praceta Dr. Eduardo Vieira de Mascarenhas 3,  
R/C Dto, 2640–800 Mafra, Portugal

# LUSITANO HERITAGE COOKIE POLICY

**Lusitano Heritage / Proezas Diárias Lda**

*Last updated: December 2025*

This Cookie Policy explains how Lusitano Heritage (Proezas Diárias Lda) uses cookies and similar technologies on our website. It should be read together with our **Privacy Policy**, which explains how we process personal data.

By continuing to use our website, you agree to the use of cookies as described below, unless you withdraw or modify your consent through your browser or through our cookie banner (if enabled).

## 1. What Are Cookies?

Cookies are small text files stored on your device when you visit a website. They help websites function, improve user experience, and provide analytics to site owners.

Cookies may be:

- **Session cookies** (expire when you close your browser)
- **Persistent cookies** (remain until deleted or expire)
- **First-party cookies** (set by our website)
- **Third-party cookies** (set by external services we use)

## 2. Why We Use Cookies

We use cookies for the following purposes:

✓ **Strictly Necessary Cookies**

Required for the website to function.

Examples: website security, checkout pages, cookie preference storage.

### ✔ **Functional Cookies**

Enhance user experience (language preferences, login sessions, shop functionality).

### ✔ **Analytical / Performance Cookies**

Help us understand how users interact with our site.

Example: Google Analytics 4 (GA4).

### ✔ **Marketing / Tracking Cookies (limited use)**

Used by third-party processors (e.g., Mailchimp) for campaign analytics.

We do **not** use intrusive targeted advertising.

## 3. Cookies Used on This Website

Below is a list of the primary cookies and similar technologies we use.

### A. Strictly Necessary Cookies

Cookie	Provider	Purpose	Duration
PHPSESSID / WordPress session cookies	WordPress	Enables basic site functionality and security	Session
__stripe_mid / __stripe_sid	Stripe	Enables secure online payments and fraud prevention	1 year / Session
wt_session	WeTravel	Manages retreat booking sessions and checkout flows	Session
AWSALB / AWSALBCORS	Ecwid/Shopify hosting	Ensures load balancing and stable shop performance	7 days

These cookies do **not** require user consent (GDPR Article 5).

## B. Functional Cookies


Cookie	Provider	Purpose	Duration
wp-settings, wp-settings-time	WordPress	Stores user preferences for returning visitors	1 year
Ecwid-storefront cookies	Ecwid	Enables shop cart, product display, and checkout	Varies
Shopify functional cookies	Shopify	Required for store operation (cart, preferences)	Varies

## C. Analytical Cookies (Consent Required)

Cookie	Provider	Purpose	Duration
_ga, ga<container-id>	Google Analytics 4	Tracks site usage anonymously	2 years
_gat	Google Analytics	Helps limit data collection on busy sites	1 minute
_gid	Google Analytics	Tracks session-level page views	24 hours

These cookies help us improve navigation, understand visitor engagement, and optimise content.

## D. Marketing & Email Performance Cookies (Consent Required)

Cookie	Provider	Purpose	Duration	
Mailchimp campaign tracking	Mailchimp	Tracks newsletter engagement (if subscribed)	Varies	
mc_cid / mc_eid	Mailchimp	Tracks referral source for newsletters	Varies	

We do **not** run behavioural advertising or cross-site tracking.

## 4. Your Cookie Choices

You can manage cookies in the following ways:

### ✓ Via your browser settings

You can block, delete, or disable cookies at any time.

### ✓ Via our consent banner (if enabled)

You may accept only essential cookies or customise your preferences.

### ✓ Declining Google Analytics

You may install the GA opt-out tool:

<https://tools.google.com/dlpage/gaoptout/>

Please note:

Blocking essential cookies may affect site performance and retreat booking functionality.

## 5. Third-Party Services That Use Cookies

We use reputable third-party tools to operate our business. These include:

- **Google Analytics 4** (analytics)
- **WeTravel** (retreat bookings & payments)
- **Stripe** (secure payments)
- **Mailchimp** (email marketing)
- **Ecwid** (current online shop)
- **Shopify** (future shop)
- **WordPress hosting** (site performance & security)

These services may set their own cookies subject to their privacy policies.

## 6. Data Transfers Outside the EU

Some providers, such as Mailchimp or Stripe, may store data outside the EEA.

All transfers are protected by:

- Standard Contractual Clauses (SCCs)
- GDPR-compliant safeguards

## 7. Updates to This Cookie Policy

We may update this policy periodically.  
Any changes will appear on this page with a new “Last Updated” date.

## 8. Contact Information

If you have any questions about our Cookie Policy:

**info@lusitanoheritage.com**


Proezas Diárias Lda

Praceta Dr. Eduardo Vieira de Mascarenhas 3,

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## 2. Data Retention Schedule (GDPR Appendix)

Data Category	Retention Period	Legal Basis / Reason	
Retreat bookings & client details	7 years	Legal obligation (accounting & tax)	
Payment records (Stripe, WeTravel)	7 years	Legal obligation	
Invoices & financial	7 years	Legal obligation	
Client health / dietary information	12 months after retreat	Safety + explicit consent	
Accident or incident reports	10 years	Legal, insurance & liability requirements	
Emails & customer enquiries	24 months	Legitimate interest	
Mailchimp newsletter data	Until user unsubscribes	Consent	
Horse sale enquiries	24 months	Legitimate interest	
Horse PPE reports & sales documentation	10 years	Legal + contractual necessity	
Website analytics (GA4)	26 months	Legitimate interest (anonymised)	
Photos/videos with guest consent	Until consent withdrawn	Consent	
Staff records	Duration of employment + 7 years	Legal requirement	
Supplier/contractor agreements	Duration of contract + 7 years	Legal requirement	

” Ask ChatGPT



