



**SBSS CONSULTING, LDA**  
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## Privacy Policy (last updated: 25.05.2018)

### Who is responsible for collecting and processing data?

SBSS CONSULTING LDA is the entity responsible for the collection and processing of personal data and may, within the scope of its activity, use entities subcontracted by itself to carry out the purposes indicated herein.

### Who is the Data Protection Officer?

N/A

### What is personal data?

Personal data is any information of any nature and regardless of its support, including sound and image, relating to an identified or identifiable natural person. Any person who can be identified directly or indirectly, namely by reference to an identification number or one or more specific elements of his / her physical, physiological, psychic, economic, cultural or social identity, shall be considered identifiable.

### What personal data are collected and processed?

SBSS CONSULTING LDA mainly collects data on companies, however, and because companies are necessarily represented by natural persons collects the personal data of these owners, only to the strictest extent necessary for the pursuit of the purposes below indicate. The data collected directly from the persons / structure of the client or partner company are as follows:

- Name
- Email
- Telephone
- Mobile Phone

SBSS CONSULTING LDA assumes that the data has been provided by the owner or that the user has given permission to do so and presumes that it is true and up to date.

### How is the data collected by SBSS CONSULTING LDA collected?

Personal data may be collected by the following means:

- a) Electronic mail;
- b) Website;
- c) Telephone calls;

The collected data are processed and stored in a computerized manner and strictly in compliance with the law of protection of personal data being stored in central databases, used by SBSS CONSULTING LDA or the entities contracted by it.

### What is the purpose of the data collected?

The data is intended to integrate a personal data file that SBSS CONSULTING LDA may use for the following purposes:

- a) Response to contact requests;

- b) Agenda of contacts;
- c) Opening new Customers and updating the data;
- d) Sending of newsletters, commercial campaigns, notifications;
- e) Sending commercial information about the services of SBSS CONSULTING LDA;
- f) Compliance with legal or regulatory obligations;

In order to achieve the purposes identified above, SBSS CONSULTING LDA may proceed with the interconnection of the data collected, with the purpose of updating and completing such data.

#### **What is the basis for the processing of your data?**

The treatment of the data collected is based mainly on the contract for the provision of the services of SBSS CONSULTING LDA or pre-contractual procedures for the provision of these same services.

The processing of your data may also be based on compliance with legal obligations.

#### **With whom are your data shared?**

The data collected and held by SBSS CONSULTING LDA may be transmitted, with respect for the duty of confidentiality and the principle of the purpose that led to its collection, for the following entities:

- a) Judicial or administrative authorities, in cases in which such assignment is obligatory;
- b) Subcontractors that will process the data on behalf of the Company and according to the purposes determined by the Company.

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

Under the terms of the Personal Data Protection Act, we guarantee you the right to access, update, rectify, delete, portability and erase your personal data.

We also give you the right to object to the use of the data provided for marketing purposes, to send informative communications or to include them in lists or information services.

As we process data on the basis of legitimate interest, may oppose the treatment of data, and it will cease as long as the interests you invoke prevail over our reasons for treatment.

The exercise of these rights must be done through the following email address [protecaodados@sbssconsulting.pt](mailto:protecaodados@sbssconsulting.pt) or by letter CTT to the address of the registered office of SBSS CONSULTING LDA, currently:

Edif. Tower Plaza - Via Eng<sup>o</sup> Edgar Cardoso n<sup>o</sup> 23 7<sup>o</sup>E 4400-676 Vila Nova de Gaia PORTUGAL.

You may also file complaints to the CNPD.

#### **How long are your data stored?**

The length of time during which the data is stored and stored varies according to the purpose for which the information is processed. Where there is no specific legal requirement, data shall be stored and retained only for the minimum period necessary for the purposes for which it was collected or later processed, after which time the data shall be deleted.

#### **Is your data taken Secure?**

SBSS CONSULTING LDA is committed to ensuring the protection of the security of your data. To that end, it has adopted a number of technical and organizational security measures in order to protect the personal data it makes available to us against its unauthorized diffusion, loss, misuse, alteration, treatment or access, as well as against any other form of illicit treatment. SBSS CONSULTING LDA requires its subcontractors and its partners to adopt safety measures equivalent to those it practices. Notwithstanding the safety measures practiced by SBSS CONSULTING LDA, the user must adopt additional safety measures, namely to ensure that he / she uses equipment and software updated security and properly configured with active firewall, anti-virus and anti-spyware, and make sure the authenticity of the sites you visit on the internet, and avoid websites whose reputation you do not trust so that information exchange with SBSS CONSULTING

**Communications**

SBSS CONSULTING LDA acknowledges that it will be able to communicate customer data within merger, acquisition and / or incorporation processes in which it is located, not considering this communication as a transfer of data to third parties, nor existing any subcontracted treatment.

**Data Transfer**

SBSS CONSULTING LDA may also transmit data to third parties in the context of investigations, inquiries and judicial and / or administrative proceedings or of a similar nature, provided that it is duly ordered by judicial order accordingly. Transfer of Data third countries which are not members of the European Union or the European Economic Area, SBSS CONSULTING LDA shall comply with the law, in particular as regards the suitability of the country of destination for the protection of personal data and the requirements applicable to such transfers, and personal data are not transferred to jurisdictions that do not offer guarantees of security and protection.

**Privacy Policy Updates**

SBSS CONSULTING LDA reserves the right to make any adjustments or changes to this Privacy Policy at any time, duly publicized and notified via email and on our website: [www.sbssconsulting.pt](http://www.sbssconsulting.pt) .

Kind Regards,

A handwritten signature in black ink, appearing to read 'Luís Barros', with a stylized flourish at the end.

(Luís Barros - CEO)