

Privacy Policy in the Treatment of Personal Data

General Data Protection Regulation (GDPR)

Since May 25, 2018, it's applicable to all entities that process personal data or the General Data Protection Regulation (Regulation No. 2016/679 of the European Parliament and the Council, of April 27, 2016) or whatever:

- a) Define the rules defined for the protection of natural persons who do not respect the processing of personal data and the free movement of such data;
- b) Defends the fundamental right and freedoms of natural persons, namely the right to protection of personal data.

FERRÃO & GUERRA, LDA., As the entity responsible for Data Processing, under the GDPR comes to inform the following:

a) Responsible for the processing of personal data and respective contacts:

FERRÃO & GUERRA, LDA.

Bairro Industrial da Alagoa

3750-301 Águeda

Phone: 234 623 471

Email: contabilidade@ferraoguerra.pt

b) Purpose of the processing of personal data

The processing of your personal data allows, among other purposes:

- The development and direct marketing of products / services that we believe are the most appropriate to the profile and needs of each Client;
- Response to the contact request;
- Commercial management;
- Maintenance of internal registration;
- Sending newsletters and newsletters. Customers can cancel their subscription to the newsletters by email, by clicking on the link in the newsletter we send by email;
- Compliance with legal requirements.

c) Legal basis for the processing of personal data

Reasons for the processing of personal data - *Article 6 and recitals 40, 41 to 49 of the GDPR:*

FERRÃO & GUERRA, LDA. it only processes personal data based on the following circumstances:

- With the consent of natural persons;
- When there is a contractual obligation between FERRÃO & GUERRA, LDA. and a customer;
- To comply with a legal obligation (provided for in EU law or national law)

All data processing operations comply with the fundamental legal principles in the scope of data protection and privacy, namely regarding their circulation, lawfulness, loyalty, transparency, purpose, minimization, conservation, accuracy, integrity and confidentiality, being FERRÃO & GUERRA, LDA. available to demonstrate its responsibility towards the data subject.

All operations of processing personal data related to the provision of services by FERRÃO & GUERRA, LDA. they are a necessary requirement for the fulfillment of the same, and the failure to provide personal data by the holders makes the provision of these same services unfeasible, resulting in their termination.

d) Categories of personal data to be collected

The categories of personal data to be collected are as follows:

- Identification info;
- Contact details;
- Data billing;
- Family life data;
- Data on professional life;
- Financial information;
- Traffic and location data;
- Internet browsing data;
- Other categories of non-sensitive personal data.

e) Period of retention of personal data

The period of conservation of the data collected in the scope of the services provided by FERRÃO & GUERRA, LDA. derives from what is stipulated in general or specific legislation, applied to each type of document generated or treatment carried out, and as a general principle, personal data will only be kept for the strictly necessary period, that is, during the term of the service provision contract. services, or until the end of the purpose for which the data was processed.

With regard to documents of a fiscal or administrative nature, the conservation period is carried out for a period of 10 years. For other documentation, the respective conservation periods are defined on a case-by-case basis in the data mapping procedure, taking into account specific legislation.

f) Recipients of personal data

FERRÃO & GUERRA, LDA. may send personal data in the context of mandatory communications imposed by law to public authorities. However, public authorities that may receive personal data in the context of specific investigations under European Union law are not considered to be recipients (see Art. 4, paragraph 9 of the GDPR).

FERRÃO & GUERRA, LDA. it may also send personal data to financial institutions or accounting service providers, within the scope of compliance with the commercial and tax obligations to which the parties involved in the services provided are subject, or the company providing Safety and Health at Work services and training entities.

FERRÃO & GUERRA, LDA. it only sends data to third parties that attest to the adoption and compliance with the GDPR.

g) Rights of data subjects

Without prejudice to the applicable legislation or the contracts under which personal data were provided, data subjects are entitled to: - article 15 to 22 of the GDPR

- **Obtain information** about the treatment of your personal data;
- **Obtain access** to the preserved personal data concerning them;
- Request the **correction** of incorrect, inaccurate or incomplete personal data;
- Request the **deletion of personal data** that is no longer needed;
- **Oppose** the processing of your personal data for reasons that relate to your specific situation;
- Request to **limit the processing** of your personal data in specific cases;
- Receive your personal data in automatic reading format and send it to another responsible for the processing (**data portability**).

Personal data holders are also entitled to:

- Withdraw consent at any time, without compromising the lawfulness of the treatment carried out based on the consent previously given - article 7, paragraph 3 of the GDPR;
- Submit a complaint to a supervisory authority - article 77 of the GDPR.

h) Security measures adopted by FERRÃO & GUERRA, LDA.

FERRÃO & GUERRA, LDA. is committed to ensuring the confidentiality, protection and security of personal data to its customers, by implementing the appropriate technical and organizational measures to protect them against any form of improper or illegitimate treatment and against any accidental loss or destruction of this data.

For this purpose, FERRÃO & GUERRA, LDA. has systems designed to guarantee the security of processed personal data, creating and updating procedures that prevent unauthorized access, accidental loss and / or destruction of personal data, committing itself to respect the legislation on the protection of customers' personal data and the treat this data only for the purposes for which it was collected, as well as to ensure that this data is treated with adequate levels of security and confidentiality.

FERRÃO & GUERRA, LDA. it includes practices and standards regarding the protection of personal data, with a view to ensuring that workers are aware of the obligations imposed on them in this area. In order to ensure the permanent awareness of its workers, it has also developed training with them, who undertake not to reveal to third parties or use for purposes contrary to the law, any personal information of customers, whose knowledge comes from the exercise of their functions.

i) Exercises of rights

All rights listed can be exercised free of charge to the following email address: Contabilidade@ferraoeguerra.pt

If you are dissatisfied with our use of your personal data or with our response after exercising any of these rights, you have the right to file a complaint with your supervisory authority (National Data Protection Commission - CNPD | Rua de São Bento, no. 148, 3º, 1200-821 Lisboa | Tel: 351 213928400 | Fax: +351 213976832 | e-mail: geral@cnpd.pt).

j) Communication in case of violation of access to personal data

Notwithstanding the technical and organizational measures adopted by FERRÃO & GUERRA, LDA., In the event of improper or unauthorized access to personal data, which may compromise the rights and freedoms of individuals, the data controller will inform the supervisory authority within 72 hours of becoming aware of the occurrence.

The data controller will also inform the data subject about the breach, when there is a likelihood that it will result in a high risk to the rights and freedoms of the natural person, in order to allow him to take the necessary precautions.

Águeda, September 6, 2019

Ferrão & Guerra, Lda.