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FINGESTE'S PRIVACY POLICY

This text refers to the Privacy Policy applicable to the platforms and / or sites controlled by FINGESTE (hereinafter collectively referred to as "FINGESTE Sites").

OMNICAPITAL LDA (FINGESTE ABBREVIATED) is a public corporation that is registered at the ENTITY WHERE REGISTERED, with the unique registration and identification number of PT 510 685 870 and is based at Rua da Bela Vista à Graça N75 – 3D, Lisbon.

This Privacy Policy explains how FINGESTE handles the personal data that users of the FINGESTE Sites provide to it or that are otherwise collected through the FINGESTE Sites. The privacy practices of the FINGESTE Sites comply with this Privacy Policy.

However, before using the FINGESTE Sites or providing personal data to FINGESTE, we recommend reading this Privacy Policy, as the collection and processing of personal data may vary according to the specific characteristics of each FINGESTE site or platform.

By accessing and using the FINGESTE Sites, the user (hereinafter "User" or "Users") accepts and authorizes the collection, use and disclosure of his/hers personal data (information that may identify the user), as provided in this Privacy Policy.

Unless otherwise stated, this Privacy Policy does not apply to the collection of offline data from the User, nor to the third-party sites to which the FINGESTE Sites may be linked. It is recommended that the user reads this Privacy Policy whenever the user visits each of the FINGESTE Sites.

The Responsible for processing

FINGESTE Sites belong to FINGESTE, a public corporation, enrolled in the ENTITY WHERE REGISTERED, with the unique registration and identification number of REGISTRATION NUMBER, with headquarters at FINGESTE ADDRESS, which is the entity Responsible for the Processing of Personal Data provided by Users through the FINGESTE Sites.



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Before providing your personal data to FINGESTE, you should carefully read this Privacy Policy and confirm its acceptance in the specific field for this purpose.

The processing of personal data includes

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Additional information about the Privacy Policy

FINGESTE is governed by the legislation in force and is bound by compliance with this Privacy Policy of the Site.

Without prejudice, FINGESTE reserves the right to change without notice this Privacy Policy. Any changes to this Privacy Policy will be published on the FINGESTE Sites, so it is advisable to regularly consult this document. The version published in FINGESTE Sites is the one currently in force, as well as the specific rules applicable to the processing of Personal Data collected through each of the FINGESTE Sites. If you do not agree to this Privacy Policy, please do not provide your Personal Information. However, we caution that the



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use of the services provided on the FINGESTE Sites is conditional on the provision of your Personal Data, without which you will not be able to benefit from the services available there.

More detailed information on the protection of personal data may be obtained by consulting the applicable legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of April, 27th 2016.

Legitimacy for processing

FINGESTE makes available to FINGESTE Website Users a set of information and services described there. FINGESTE needs to collect and process a set of personal data, which, being essential to the provision of services, are inserted in a computerized database owned by FINGESTE.

The provision of personal data is optional. However, if Users of the FINGESTE Sites wish to benefit from the services offered and / or receive information about the services and / or be contacted by FINGESTE, they will have to provide their personal data and authorize their processing, filling in all the mandatory fields of the applicable forms.

FINGESTE will only treat your data for the purpose of sending commercial and marketing information if expressly authorized by the User.

The processed data

As the Responsible for the Processing of your Personal Data, FINGESTE collects the following personal data from FINGESTE Website Users: name and e-mail, without prejudice to other data that may be requested later for the purposes described in this Policy of Privacy, in accordance with the specificities of the relationship that the holder of the personal data intends to establish with FINGESTE through each of the FINGESTE Sites.

As a rule, if FINGESTE develops sites that collect data for minors, FINGESTE does not collect or process on these sites any data of minors without the consent given or authorized by the parents and / or legal representatives thereof, in accordance with the provisions of Articles 6 (1) (a) and 8 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and in accordance with the applicable national law.



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Purposes of processing

The personal data referred to above, supplied by the users to FINGESTE, are processed by FINGESTE for the following purposes:

- Provision of the various services available on the FINGESTE Sites;
- Fulfilment of legal obligations in the capacity of System Manager or others;
- To satisfy and respond to all the requests of the Users of the FINGESTE Sites and, thus, manage their relationship with FINGESTE;
- Creation of an FINGESTE's field of expertise consumer profile with a view to presenting to users the best solutions offered by the various economic operators for that particular User, within the scope of their legal attributions; - *if applicable*
- For statistical purposes;
- For quality control;
- Sending information and promotional communications. If you provide your express consent in the field included in the registration form, FINGESTE may use your personal data for the purpose of sending promotional information about FINGESTE's field of expertise, offers, news, initiatives, events, promotions and newsletters from FINGESTE and / or from third parties related to the FINGESTE's field of expertise or type of service. Please note that you may at any time withdraw your consent to receive these promotional communications by using the "Remove" link available in all communications sent to you or by sending an email to the Data Protection Officer to the address FINGESTE's designated Data Protection Officer's email. If you refuse to give your consent or withdraw your consent, FINGESTE will not be able to inform you of initiatives, offers, news or advantages that may interest you and / or to send you other information of a commercial nature about solutions in the area of FINGESTE's field of expertise, in particular for the promotion of FINGESTE's themes or services.

In no case will the Personal Data of the Users be used by FINGESTE for the purpose of sending promotional communications, without their express consent.



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Subcontractors and communication of data to third entities

The User's Personal Data will be processed by FINGESTE's employees and employees who are duly authorized to carry out their processing in the performance of their duties, who are functional and contractually obliged to treat Users' Personal Data, in accordance with the law and this Privacy policy.

Users' Personal Data may also be processed by subcontracting entities of FINGESTE, which will handle the same according to instructions and on behalf of FINGESTE, for example, for the maintenance and technical management of the computer system and management of information systems, management of campaigns, or other. FINGESTE requires subcontractors to comply with a set of obligations, among which are included, the ones to adequately protect Users' Personal Data, ensuring its confidentiality and the prohibition of the use of such data for any purpose other than those mentioned herein and / or consented to by the User.

Depending on the specific processing purposes, the grounds of legitimacy and the specific consents provided by the Users, the Personal Data of the Users may be communicated to suppliers or service providers of list of entities related to the FINGESTE or other entities with which FINGESTE relates by virtue of its attributions.

FINGESTE may transfer User data abroad in accordance with applicable law, including for countries outside the European Union. FINGESTE will not transfer its data to countries that do not guarantee an adequate level of protection according to the applicable legislation.

In addition to the above entities, the Personal Data of Users may be communicated, when required by applicable legal provisions, to judicial or police authorities or any authorities that may legitimately receive them under the legal terms. Your personal data may be communicated to such administrative and judicial entities in the context of proceedings for breach of the general conditions of use of the FINGESTE Sites for the purpose of determining any civil, administrative or criminal liability.



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Processing conditions

FINGESTE, as the Responsible for the Processing of Personal Data made available by Users of the FINGESTE Sites, observes all applicable legal provisions regarding the processing of the data collected by them.

FINGESTE guarantees the quality, accuracy, integrity and confidentiality of the data entrusted to it, as well as the legitimacy for its processing under the legal terms, namely the lawfulness, security and confidentiality of the processing, the non-after use of the personal data for purposes other than those stated at the time of collection, except with the express prior consent of the data subject, and the retention of the data only for the period necessary for the purposes of the collection / processing.

Security measures

FINGESTE has appropriate technical and organizational measures to protect the personal data of users of FINGESTE Sites against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure and / or access. FINGESTE uses appropriate systems and procedures to protect and safeguard the integrity of Personal Data provided to it, namely, organizational, technical and physical security restrictions to access servers, and only authorized employees can access personal data during the performance of their work and for the purposes indicated herein. Without prejudice, and to the maximum extent permitted by Law, FINGESTE shall not be liable for attacks or any unlawful acts of third parties.

FINGESTE makes every effort to protect Users' Personal Data from unauthorized access through the Internet. For this purpose, it uses security systems, rules and other procedures, in order to guarantee the protection of the personal data of Users, as well as to prevent unauthorized access to the data, its improper use, its disclosure, loss or destruction.

It is, however, the User's responsibility to ensure that the computer he/she is using is properly protected from harmful software, computer viruses and worms. In addition, the User should be aware that without the adoption of appropriate security measures (for example, safe configuration of the browsing program, up-to-date antivirus software, security barrier software and non-use of software from a suspicious source), the risk



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of personal data and passwords to be accessed by third parties, without authorization to do so, is aggravated.

However, it should be noted that whenever data collection takes place on open networks, such as the Internet, your data may be unsafe and may be viewed and used by unauthorized third parties.

Data preservation

In accordance with the law, FINGESTE will only process the Personal Data of the Users during the period necessary for its processing. At the end of this period the data will be deleted or anonymised so as not to allow its identification.

For the purposes of providing the various services available on the FINGESTE Sites, Users' data will be kept for a period of 24 (twenty four) months after the termination of service or payment, whichever is later, without prejudice to the need to maintain compliance with legal and contractual obligations, including but not limited to accounting and tax. In case of a complaint, the data will be kept for an additional period of 90 (ninety) days or until the resolution of the complaint.

The pre-contractual data will be retained for a period of 60 (sixty) days.

For the purposes of complying with legal obligations, as Systems Administrator or other entity, User data will be kept for a period of 5 (five) years.

For the purpose of creating a FINGESTE's business sector user profile with a view to presenting to users the best solutions made available by the various economic operators for that particular User, within the scope of their legal attributions, the users' data will be kept for a maximum period of 24 (twenty-four) months after the last access to the FINGESTE Site.

For statistical purposes, the data of the Users will be anonymised in a way that does not allow the identification of their holders and will therefore be kept indefinitely.



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For quality control purposes, User data will be kept for a period of 30 (thirty) days.

For the purpose of sending information and promotional communications, User data will be kept for a period of five (5) years after last contact.

Rights of the data subjects

FINGESTE assures to the Users of the FINGESTE Websites all legally established rights, namely the right to obtain confirmation that their data are being processed, as well as all information related to such processing, to know the source of the data, the recipients or categories of recipients to whom the Personal Data has been or will be disclosed, as well as know the expected period of storing of user's Personal Data. FINGESTE also assures the exercise of the rights of access, opposition and / or limitation to the processing, revocation of consent, portability, as well as the possibility of update, rectification or elimination of the personal data by the respective holder.

FINGESTE will allow Users of the FINGESTE Sites to exercise their rights at all times in accordance with the applicable law, by contacting FINGESTE in writing.

FINGESTE has a Data Protection Officer who can be contacted to clarify doubts, provide information, resolve any question or satisfy any request for exercise of rights or any other regarding the Processing of Personal Data carried out by FINGESTE.

The Data Protection Officer can be contacted through the following addresses, which may also be used to clarify any doubts and questions related to this Privacy Policy:

- FINGESTE's designated Data Protection Officer's email: eunicemarques@fingeste.com
- FINGESTE's designated Data Protection Officer's professional address: Rua da Bela Vista à Graça N75 – 3D. 1170-055 Lisboa



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Any request addressed to FINGESTE Data Protection Officer should be sent to FINGESTE's designated Data Protection Officer's email.

The legitimate requests of Users will be analysed and answered by FINGESTE within 30 (thirty) days. This period may be extended for a further 30 (thirty) days, if absolutely necessary and upon sending prior justification by FINGESTE to the requesting User.

FINGESTE processes the Personal Data of the Users in accordance with the requirements of legislation in force.

Without prejudice to that referred to in the last paragraph, if any User believes that FINGESTE does not comply with the law or does not respect its rights, it may submit a complaint to the National Data Protection Commission.

Browsing data

FINGESTE uses in its Sites software and computer systems that collect, during their normal operation, some personal data (called registration files), the transmission of which is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified people. However, due to their nature they can, through the processing and integration with data held by third parties, allow the identification of Users. Such information includes the IP addresses or domain names of the computers used by Users to connect to the Site, addresses in the form of URL (Uniform Resource Locator) of the requested resources, the time of the request, the method used to submit the request to the server, the file size obtained in the response, the numerical code indicating the status of the response issued by the server (completed, error, etc.) and other parameters related to the user's operating system and computer environment.

This data is used for the sole purpose of obtaining anonymous statistical information about the use of the Site and to verify that it is working correctly.



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Additional information about Cookies

A “cookie” is a piece of information a website sends to your Internet browser that helps the site remember information about you and your preferences.

Session cookies are temporary pieces of information that are used to improve browsing and identify the user through the same visit to the site. It can collect browsing information for statistical purposes. They are deleted when you turn off your browser or when, for whatever reason, it ceases to be active.

Permanent cookies are more permanent pieces of information that are placed on your computer's hard drive and remain there unless you delete them. Permanent cookies store information on your computer for a variety of purposes, such as retrieving certain information you previously provided (such as passwords), helping determine which zones of the website are considered most valuable by visitors, and configuring the site based on preferences on an ongoing basis. Persistent cookies installed by this site on your computer may contain personal data, but only if you have registered or otherwise authorized such data collection.

Otherwise, the server on our site only knows that an unidentified visitor with your cookie has re-entered the site.

The site may use Internet protocol (IP) addresses. An IP address is a number assigned to your computer by your Internet service provider so that you can access the Internet and is generally considered to be non-personally identifiable information, in that, in most cases, the IP address is dynamic (changing each time it connects to the Internet), and not static (own computer of a particular user). The IP address can be used to diagnose problems with the server, report aggregate information, determine the fastest way for your computer to connect to a site, and to administer and improve the site.

Internet tag (also known as single-pixel GIFs, pixel tag, clear GIFs, and 1x1 GIFs) are files that are smaller than cookies and transmit information such as the IP address to the site server and the type of browser relative to the user's computer. Tags can be placed in both online ads that attract people to the site and on different pages of the site. These tags indicate how often a page is opened and what information is queried.



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Browsing Data (log files, server log, and clickstream data) are used for system management, for improving site content, for market research purposes, and for communicating information to users.

Types of cookies used by FINGESTE

There are two main types of cookies: session and permanent cookies.

Session cookies are temporary and only remain in the cookie file until the user leaves the site, so they are deleted when you close the browser. The information obtained serves to analyse traffic patterns, which facilitates the identification of problems.

The permanent cookies are stored until the User manually deletes them or the expiration date expires. They are used whenever the User makes a new visit to the site for a more personalized service, adjusting the navigation to their interests.

Of these types of cookies, FINGESTE uses, in the FINGESTE Sites, cookies for various purposes. Analytical cookies are used anonymously for statistical purposes. Feature cookies retain User preferences. Third-party cookies measure the success of applications and can be used to customize buttons, menus, icons, and other graphical user interface components with user data (called widgets).

FINGESTE does not store personally identifiable information in the cookies it uses. It also does not use cookies to direct advertising to its Users due to its browsing, or for other FINGESTE advertising purposes or third parties'.

Cookies Management

All browsers allow the User to accept, decline or delete cookies at any time by configuring the appropriate settings in their browser. The User can configure cookies in the "options" or "preferences" menu of his/hers browser.



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Please note that when you disable cookies, you lose the auto-completion of some data, such as login. In addition, it may prevent some online services from functioning properly, affecting navigation on the FINGESTE Sites.

Web push Direct notifications

FINGESTE's sites may invite you to receive notifications directly in your browser (Web push notifications). You may accept or decline the request for notification each time you receive the notification. Direct notifications in the browser will always be on topics pertinent to the site and will not collect any personal information or your computer.

Links to third-party sites

FINGESTE's sites contains links to other sites of third parties, so it is recommended to consult the pages that, within those sites, refer to their respective privacy policies.

FINGESTE's sites Privacy Policy is not applicable to third-party sites, so if you visit another site from here you should always read the privacy policy of that site and verify that you agree to its terms before submitting your data.

FINGESTE is not responsible for the privacy policy or the content made available on third party websites.

Text reviewed and comply with the EU General Data Protection Regulations 2016/ 679 ("GDPR")