

LIST OF REVISIONS CARRIED OUT

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WEBSITE PRIVACY POLICY

Your privacy is important to us.

Who are we?

PASSIO CONSULTORIA E ENGENHARIA, LDA. aims to be one of the leading IT companies specialising in **decision support systems and focused on Business Intelligence, Artificial Intelligence, Data Platforms and Data Virtualisation solutions**, supporting organisations by transforming data into valuable *insights* for real business value.

Committed to excellence and the satisfaction of its clients, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** strives to make a difference by defending and promoting the values of ethics, rigour, transparency, fairness, a culture of continuous improvement and responsibility.

Why this Privacy Policy?

The purpose of this Policy is to inform Clients of the general rules governing the processing of personal data by **PASSIO CONSULTORIA E ENGENHARIA, LDA**, which are collected and processed in strict compliance with the provisions of the personal data protection legislation in force at all times, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR") and Law no. 58/2019 of 8 August 2019.

PASSIO CONSULTORIA E ENGENHARIA, LDA. respects the best practices in the field of security and protection of personal data, and to this end has taken the necessary technical and organisational measures in order to comply with personal data protection legislation and ensure that the processing of personal data is lawful, fair, transparent and limited to the authorised purposes.

PASSIO CONSULTORIA E ENGENHARIA, LDA. is committed to the protection and confidentiality of personal data and has adopted the measures it deems appropriate to ensure the accuracy, integrity and confidentiality of personal data, as well as all other rights that the respective owners have.

The rules laid down in this Personal Data Privacy Policy complement the provisions on the protection and processing of personal data laid down in the contracts that Clients enter into with **PASSIO CONSULTORIA E ENGENHARIA, LDA.** as well as the rules laid down in the terms and conditions that regulate the offer of the various products and services and which are duly publicised on the respective website.

What is Personal Data?

Personal data is any information of any nature and regardless of its medium, including sound and image, relating to an identified or identifiable natural person.

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An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location data, an electronic identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

What does the processing of personal data consist of?

The processing of personal data consists of an operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, namely collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, comparison, interconnection, restriction, erasure or destruction.

Who is the Data Controller?

The entity responsible for processing personal data is **PASSIO CONSULTORIA E ENGENHARIA, LDA.**, which determines the purposes and means of processing such data.

To this end, if the holder of the personal data needs to contact the data controller, they can send a written communication addressed to the controller at the following address:

Espaço Sete Rios, LEAP, Rua de Campolide, n.º 351, 0.05, 1070-034 Lisboa

or

Email: cdo@passio-consulting.com

Data covered by this Privacy Policy

This privacy policy describes the privacy practices of **PASSIO CONSULTORIA E ENGENHARIA, LDA.** for the data we collect:

- through **sites** operated by **PASSIO CONSULTORIA E ENGENHARIA, LDA.** and other sites owned or controlled by **PASSIO CONSULTORIA E ENGENHARIA, LDA.**;
- through the software **applications** made available by **PASSIO CONSULTORIA E ENGENHARIA, LDA.** for use on or through computers and mobile devices;
- through pages controlled by **PASSIO CONSULTORIA E ENGENHARIA, LDA.** on **social networks** and from which you are accessing this privacy policy;
- through **e-mail** messages that **PASSIO CONSULTORIA E ENGENHARIA, LDA.** sends with the link to this privacy policy and through communications established online or in person;
- from third parties, such as **Authorised Licensees, Strategic Business Partners, Owners** and other Sources.

General principles applicable to the processing of personal data

PASSIO CONSULTORIA E ENGENHARIA, LDA. undertakes to ensure that the personal data it processes are:

- Object of lawful, fair and transparent processing in relation to data subjects;

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- Collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes for which they are processed;
- Accurate and updated whenever necessary;
- Kept in a form that allows the identification of data subjects for no longer than is necessary for the purposes for which they are processed;
- Handled in a way that guarantees their security, including protection against unauthorised or unlawful processing and against their loss, destruction or unforeseen damage, and appropriate technical or organisational measures are taken.

The data we collect and how we process it

PASSIO CONSULTORIA E ENGENHARIA, LDA. may have access to your data through our websites, customer platform, forms, equipment and/or social networks. The data collected is strictly necessary to fulfil the purposes for which it is collected, namely:

- For **contractual** purposes, when we provide you with one of our services;
- To provide you with **our newsletter services**, only and only when requested (name and e-mail) - By subscribing to our newsletter you agree to receive our e-mails. The purpose of our newsletter service is to send you information about our services, events and training. Subscribing to our newsletter service is not compulsory. The frequency of the newsletters to be sent will be adapted to the amount of information we collect and think may be of interest to our subscribers;
- When you sign up for our events and training programmes;
- For recruitment purposes with regard to responses to job vacancies;
Note: We are not interested in spontaneous applications, so if we receive any via email, we will automatically delete all the information.
- When you report a complaint through our Whistleblowing Channels;
- Enforce the **applicable terms of use**, establish or safeguard the right or legal defence to prevent fraud or other illegal activities, including attacks on **PASSIO CONSULTORIA E ENGENHARIA, LDA.** information systems;
- Ensuring compliance with legal obligations (e.g. tax data, customs obligations, obligations arising from funded projects);

We can therefore state that we only process your personal data in the following cases:

- When you have given us your **consent**;
- When **carrying out a contract** - for example, to enrol on a training course or request a service;
- It is in the **legitimate interest of PASSIO CONSULTORIA E ENGENHARIA, LDA.** - i.e. for the protection of our tools, ensuring that they are protected and secure;
- In cases where **treatment is mandatory by law.**

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Cookies and other Data

PASSIO CONSULTORIA E ENGENHARIA, LDA. may also collect "**Other Data**" which, in general, does not reveal your identity specifically or does not relate directly to an individual. Where other data specifically reveals your identity, or relates to an individual, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** will treat such "Other Data" as Personal Data.

Data Transfer

As a rule, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** does not transfer your personal data, but only in cases where it is necessary for one or more of the options listed below, always in such a way as to guarantee identical protection for your data:


- If we have your consent to do so;
- If necessary to carry out one of our services and in the case of partners, such as training and events;
- If we are authorised to do so by law;
- **PASSIO CONSULTORIA E ENGENHARIA, LDA.** may also transfer your personal data to other companies in the Group or to third parties, but only if and to the extent that such transfer is necessary for the purposes for which they are intended. In cases where Group companies are located outside the European Economic Area, third countries, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** will take all necessary measures to guarantee the security and confidentiality of this data, namely through the legal procedure "data protection clauses" adopted and recommended by the European Commission.
- Where legally permitted, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** may also transfer your personal data to courts, law enforcement authorities, regulators or lawyers if this is necessary to comply with the law or for the establishment, exercise or defence of a legal claim.
- In cases where the recipients of personal data may be located in "third countries", **PASSIO CONSULTORIA E ENGENHARIA, LDA.** undertakes to guarantee the same level of protection for your data.

AT NO TIME DO WE SELL YOUR DATA

Why do we collect your data?

(Legal basis)

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH THE PURPOSE	LEGAL BASIS
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Services	<p>There are various activities associated with this purpose, such as:</p> <ul style="list-style-type: none"> - Responding to information - Payment processing 	<ul style="list-style-type: none"> - Execution of the contract with the customer who purchases the service; - Legal obligations related to financial transactions, such as the obligation to invoice and record.
Recruitment / Opportunity	<ul style="list-style-type: none"> - Receive applications in response to offers published by us. <p>We are not interested in spontaneous applications, so if we receive any via email, we will automatically delete all the information.</p>	<ul style="list-style-type: none"> - Legitimate Interest (Job Offer Reply)
Newsletter - Subscribe	<p>There are various activities associated with this purpose, such as:</p> <ul style="list-style-type: none"> - communicating with customers about services and general information 	<ul style="list-style-type: none"> - Consent.
Registration Events and Training	<p>Registration of events and training that the company organises.</p>	<ul style="list-style-type: none"> - Legitimate Interest
Internal Whistleblowing Channel	<ul style="list-style-type: none"> - Compliance with the tax in Law no. 93/2021 of 20 December 	<ul style="list-style-type: none"> - Legitimate interest in preventing and repressing irregularities within the company; - Legal obligations.
Legal compliance	<p>There are various activities associated with this purpose, such as: complying with applicable laws; complying with legal process; responding to requests from public and government authorities; meeting national security or law enforcement requirements; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety or property of PASSIO CONSULTORIA E ENGENHARIA, LDA., customers, visitors and other relevant individuals; pursuing available legal remedies and limiting the damages that</p>	<ul style="list-style-type: none"> - Legal obligations, such as compliance with legal processes; - Legitimate interests, such as imposing terms and conditions for trade mark protection.

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	PASSIO CONSULTORIA E ENGENHARIA, LDA. may suffer.	
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Other uses and disclosures:

We will use and disclose Personal Data as we deem necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) protect our operations, such as in the event of any reorganisation, merger, sale, assignment, transfer or other disposition of all or any portion of the business, assets (including bankruptcy or similar proceedings); (f) protect the rights, privacy, safety or property, you or others; and (g) allow us to pursue available remedies or limit the damages we may suffer.

We may use and disclose other data for any purpose, except where we are not permitted to do so by applicable law.

Your Rights

1. **Right to be informed** - You have the right to clear, transparent and easily understandable information about how we use your data and what your rights are. That's why we provide you with all this information in this Privacy Policy.
2. **Right of access** - You have the right to obtain a copy of your data and certain information about how that data is processed. This right allows you to know and confirm that we use your data in accordance with data protection laws. We may refuse to provide you with the requested information where to do so would disclose another person's Personal Data or adversely impact another person's rights.
3. **Right to rectification** - If your data is incorrect or incomplete, you can ask us to rectify/correct it.
4. **Right to erasure of data** - Allows you to request the erasure or deletion of your data, provided there are no valid grounds for us to continue using it or its use is unlawful. This is not a general right to erasure, as exceptions are allowed (for example, whenever this data is necessary for the defence of a right in legal proceedings).
5. **Right to restriction of processing** - You have the right to "block" or prevent the further use of your data when we assess a request for rectification or as an alternative to erasure. Whenever processing is limited, we can still store your data, but we cannot use it at a later date. We keep lists of people who have requested that we "block" the future use of their data to ensure that this limitation is respected in the future.
6. **Right to data portability** - You have the right to obtain and re-use certain Personal Data for your own purposes in various organisations. This right applies only to data you have provided to us and which we process with your consent, and which is processed by automated means.
7. **Right to object** - You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time during which such processing takes place, for the purposes of the legitimate interests of **PASSIO CONSULTORIA E ENGENHARIA, LDA.** or third parties. We may continue to process this data if we can prove "overriding

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legitimate grounds for processing which override your interests, rights and freedoms" or if this data is necessary for the establishment, exercise or defence of legal claims.

8. Right to lodge a complaint with the Supervisory Authority - if you consider that your data is not being processed legitimately by **PASSIO CONSULTORIA E ENGENHARIA, LDA.** under the terms of the applicable legislation and this Policy.

Under the terms of the law, you are also guaranteed the right to withdraw your consent for the processing of data whose consent constitutes the basis for the legitimacy of the respective processing. To this end, you have the right to withdraw your consent at any time, which does not, however, invalidate the processing carried out up to that date on the basis of the consent previously given. These rights may be exercised at any time by the User, via the following e-mail address: cdo@passio-consulting.com

PASSIO CONSULTORIA E ENGENHARIA, LDA. will respond in writing (including by electronic means) to the User's request within a maximum period of one month from receipt of the request, except in cases of special complexity, where this period may be extended. If the requests submitted by the User are manifestly unjustified or excessive, particularly due to their repetitive nature, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** reserves the right to charge administrative costs or refuse to comply with the request.

Personal Data retention period

We keep Personal Data only for the period/time necessary to fulfil the specific purposes for which it was collected. However, we may be obliged to store some Personal Data for a longer period, taking into account factors such as:

- legal obligations under the laws in force to retain Personal Data for a certain period;
- prescription/statute of limitations, under the laws in force;
- litigation; and,
- guidelines issued by the competent data protection authorities.

For as long as Personal Data is processed, we guarantee that it will be processed in accordance with this Privacy Policy. As soon as the Data is no longer needed, we will securely delete it.

With regard to consent, the withdrawal of consent does not invalidate the processing carried out up to that date on the basis of the consent previously given.

In the case of the Newsletter - Your personal data will be kept by **PASSIO CONSULTORIA E ENGENHARIA, LDA.** for the period necessary for the purpose communicated in this notice, and will be deleted when you unsubscribe (when you receive our newsletter, you are given the possibility to unsubscribe) or if you exercise your rights of opposition and limitation.

5 Your rights regarding your personal data

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Security

Personal Data will only be processed in the context of the purposes identified in this Policy, in accordance with the internal policies of **PASSIO CONSULTORIA E ENGENHARIA, LDA.** and using technical and organisational measures designed in accordance with the risks associated with the specific processing of Personal Data. We use appropriate security measures to guarantee the protection of your Personal Data and prevent access by unauthorised persons. We periodically review our security policies and procedures to ensure that our systems are safe and secure. However, since the transmission of information over the Internet is not completely secure, we cannot guarantee the security of your data transmitted to our Website.

Confidentiality

We recognise that the information you provide may be confidential in nature. Within the scope of its activity, **PASSIO CONSULTORIA E ENGENHARIA, LDA.** does not sell, rent, distribute or otherwise make Personal Data commercially available to any third party, except in cases where it needs to share information with Service Providers for the purposes set out in this Policy or with Third Parties for the purpose of complying with its legal obligations. We will preserve the confidentiality of your data and protect it in accordance with our Privacy Policy and all applicable laws.

Changes to this Privacy Policy

PASSIO CONSULTORIA E ENGENHARIA, LDA. will periodically update this Privacy Policy. Whenever it does so, the new version will be published on the website and will come into force immediately, so we advise you to consult it regularly.

Tools used

- LinkedIn:

The Website offers interactivity with LinkedIn, through the respective button, establishing a connection to LinkedIn's servers, which will identify the Website that the User is visiting and possibly store other data, such as the IP address. Information on data processing carried out by LinkedIn is available at: https://www.linkedin.com/legal/privacy-policy?_l=pt_BR.

- **Facebook:**

The Website offers interactivity with Facebook, through the respective button, establishing a connection to Facebook's servers, which will identify the Website that the User is visiting and possibly store other data, such as the IP address. Information on data processing carried out by Facebook is available at: https://pt-pt.facebook.com/privacy/policy/?entry_point=facebook_page_footer

- **Instagram :**

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The *Website* offers interactivity with Instagram, through the respective button, establishing a connection to Instagram's servers, which will identify the *Website* that the User is visiting and possibly store other data, such as the IP address. Information on data processing carried out by Instagram is available at: <https://about.instagram.com/pt-br/safety>

- **Youtube:**

The *Website* offers interactivity with Youtube, through the respective button, establishing a connection to Youtube's servers, which will identify the *Website* that the User is visiting and possibly store other data, such as the IP address. Information on data processing carried out by Youtube is available at: https://www.youtube.com/intl/ALL_pt/howyoutubeworks/user-settings/privacy/

- **X:**

The *Website* offers interactivity with Twitter, through the respective button, establishing a connection to X's servers, which will identify the *Website* that the User is visiting and possibly store other data, such as the IP address. Information on data processing carried out by X is available at: https://twitter.com/pt/privacy/previous/version_15

Contact

If you need more information, please contact us at: cdo@passio-consulting.com

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