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MADEIRA MANAGEMENT

Personal Data Protection Policy

Date: 15.01.2019

Personal Data Protection Policy

CONNECT MIND considers that the security of your personal data is very important and, for this reason, works to ensure the adequate protection of any personal data that has been entrusted to it.

This policy seeks to briefly explain how personal information collected is handled and how its owners are guaranteed full confidence and privacy in all data processing operations concerning their data.

For the purposes of this policy, "personal data" means all information by which a person may be identified, and includes, without being limited to, his/her name, surname, address, telephone number, e-mail contact, age, date of birth, gender, IBAN, nationality, marital status, place of birth, passport, marital regime, personal taxation regime, profession, criminal record, preferences or satisfaction with products.

The processing of all data is carried out in accordance with the General Data Protection Regulation (GDPR) - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Within the scope of the GDPR, CONNECT MIND established an Internal Regulation and a set of procedures aiming the fulfilment of the GDPR by all its employees and the accountability of its subcontractors, committing itself to:

- Establish organizational measures that meet the requirements of the Regulation;
- Adopt internal procedures that promote the lawful and safe handling of personal data;
- Adopt, whenever possible, safety by design measures in order to minimize the data being processed and the risks in the treatment circuit thereof;
- Train and raise awareness amongst its employees and service providers to the requirements of the Regulation;
- Monitor and internally audit its procedures, promoting their continuous improvement;
- Invest in technological advances that promote the security of the data;

- Promote a clear and objective communication with the data owners and their representatives;
- Allow an easy access to the data owners who wish to exercise their rights;
- Report and handle any incidents that violate the integrity, use or conservation status of the data for which is responsible for.

What kind of data is processed by the company?

CONNECT MIND only processes personal data necessary to carry out the tasks for which it has been engaged to.

Under no circumstances, the personal data is used to send advertising or granted to third parties without express authorization.

Within the scope of its provision of services, CONNECT MIND collects and maintains personal data of its individual (natural persons) clients, as well as of both employees and shareholders of corporate clients, such as: names, complete addresses, personal and tax identification numbers, family household information, professional data, among others.

Whenever CONNECT MIND requires an external entity to treat personal data under its responsibility, a consent will be asked from the owners of such data or their representatives, who will also be informed of the purpose of such treatment.

When CONNECT MIND needs to use personal data for a different purpose than the one initially established, a consent will be asked from the owners of such data or their representatives, who will also be informed of the purpose of such treatment.

Personal data provided through forms available on the website:

The data entered in the contact form available on CONNECT MIND's website (www.connectmind.pt) is used for the sole purpose of answering the requests that originated the contacts made.

In turn, the data entered in the forms for downloading documents is used solely for the purpose of emailing such documents and subsequent follow-up mail, as well as for internal statistical purposes.

Personal data provided through other forms:

When a data owner cedes personal data through the completion of forms or by delivering copies of documents or through other means, in paper or in digital format, is expressly authorizing CONNECT MIND to process his/her personal data for the purposes included in the provision of services requested.

Within the scope of recruitment and selection:

All resumes that are received spontaneously by e-mail, postal mail or in person, are analysed and may be filed for future contacts or for the purpose of being used in recruitment processes conducted by CONNECT MIND's clients, unless the applicant expressly does not authorize further use.

In active recruitment campaigns, through advertisements in newspapers or by other means, the candidates are required to send their contacts and relevant data enabling the analyses of their professional competence.

The data filed in CONNECT MIND's database is erased after two years.

What other entities have access to your data?

Within the scope of the services rendered by CONNECT MIND, your data may be processed by the following entities:

- Zacarias da Silva Gabinete de Contabilidade Lda.
- DCS - Sociedade de Advogados RL (law firm)
- Government entities
- IT Services

- Internal and external Auditors

- Statutory Auditors

- Insurance companies

- Legal advisors

- Other advisors

Whenever this is the case, the correct data usage is ensured, only for the purpose initially established.

How does CONNECT MIND protect your personal data?

CONNECT MIND has implemented the adequate logical, physical, organizational and security measures, necessary and sufficient to protect your personal data against destruction, loss, alteration, dissemination, unauthorized access or any other form of accidental or illicit treatment.

CONNECT MIND has implemented an Internal Policy and a set of procedures aiming the fulfilment of the GDPR by all its employees and that ensure the accountability of its subcontractors.

CONNECT MIND has implemented a set of logical security measures such as the use of firewalls and intrusion detection technologies in its systems.

Among the physical security measures, CONNECT MIND implemented a rigorous access control to its physical facilities by employees, service providers, clients and visitors.

How can you exercise your rights as a Personal Data Holder?

As the responsible for the processing of your personal data, CONNECT MIND has appointed a Data Protection Officer (DPO) who is at your disposal for any questions and whenever you wish to exercise any of your rights through the following e-mail address:

dpo@connectmind.pt

Alternatively, any question can be clarified in person at the company's registered office, at Rua Direita, 35, 3rd floor, Suites A and B.

Date: 15.01.2019

The Management