



- PRIVACY AND PERSONAL DATA PROCESS POLICY -

Last update: June 2019

- PRIVACY AND PERSONAL DATA PROCESS POLICY -

OUR MISSION:

“PEDRO CÉSAR SAMPAIO E SOUSA, UNIPESSOAL LDA.” (hereinafter “PEDRO CÉSAR SAMPAIO E SOUSA”), taxpayer n.º 505 997 878, based in Norton de Rua Norton de Matos, 628E – Gulpilhares, 4405-671 Vila Nova de Gaia, established as a priority of its internal policies, the protection of personal data which it treats in the exercise of its activity.

As such it is the purpose of this POLICY to integrate the necessary concepts and guidelines for a good understanding of what will be a good conduct under Regulation (EU) 2016/679, of April 27, 2016 (“General Data Protection Regulation” ou “GDPR”) which binds PEDRO CÉSAR SAMPAIO E SOUSA as Controller.

PEDRO CÉSAR SAMPAIO E SOUSA is essentially dedicated to two distinct business areas – practice of sports activities, such as ballroom dancing, developed by "ACADEMIA PEDRO SOUSA", and, on the other hand, the exploitation of commercial activities related to sports, namely the trade in shoes and related products for ballroom dancing, carried out through the trade mark "PORTDANCE" -, which is why this POLICY should guide all the activity developed.

In addition, it should be noted that this POLICY binds not only PEDRO CÉSAR SAMPAIO E SOUSA in the exercise of its activity and its employees in the exercise of their functions, but also its relations with partners, service providers and other professionals, and may be changed at any time as necessary to update and rectify it.

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I. DATA CONTROLLER

PEDRO CÉSAR SAMPAIO E SOUSA, UNIPessoal LDA. ("PEDRO CÉSAR SAMPAIO E SOUSA")

NIPC: 505 997 878

Head office: Rua Norton de Matos, 628E – Gulpilhares, 4405-671 Vila Nova de Gaia, Portugal

PEDRO CÉSAR SAMPAIO E SOUSA is in the terms of the GDPR and under this POLICY, a Data Controller, being responsible for any damages that result to the data subjects, object of the processing operations that it performs. This quality arises from collecting and processing (processing operations) personal data of natural persons who, regardless of their nationality or place of residence, are in the European Union.

As such, PEDRO CÉSAR SAMPAIO E SOUSA considered the need for a control, maintenance and protection plan regarding the privacy of its data subjects.

In fact, PEDRO CÉSAR SAMPAIO E SOUSA assumes the following duties:

1. Apply appropriate technical and organizational measures to ensure and demonstrate that the processing operations it performs are compliant with the GDPR;
2. Cooperate with the Supervision Authority – Comissão Nacional de Proteção de Dados (CNPd) - reporting incidents and requesting opinions, when necessary and/or appropriate;
3. Adopt fast and effective communication mechanisms and procedures with the data subjects as well as technical and organizational measures necessary to assist and safeguard their rights;
4. Identify processors in order to regulate relations under the GDPR;
5. Cooperate actively with the Data Protection Officer.

II. ABOUT PERSONAL DATA AND ITS PROCESS

PEDRO CÉSAR SAMPAIO E SOUSA recognizes that in order for this POLICY to be as transparent and enlightening as possible it's necessary to identify the type of personal data processed and the processing operations conducted as well as to understand what is involved in each of them.

In addition it's essential that the data subject's data processed by the company can understand and assimilate their duties and their rights which assist them in the protection of personal data.

A. IDENTIFICATION OF PERSONAL DATA AND PROCESSION OPERATIONS

PERSONAL DATA: It includes any information, independently of the nature and its support, including sound and image, relating to a natural person, susceptible of identify it or make it identifiable, directly or indirectly, by reference to an identifier, in particular:

- .1 Name.
- .2 Identification Numbers (such as costumer number and number of registration).
- .3 Specific elements of your physical, physiological, psychic, economic, cultural identity or collected through representation by photographs, voice, digital printing and video surveillance services, social media publications, clinical and/or school history, musical tastes, etc.
- .4 Location data (eg. coordinates).
- .5 Identifiers by digital tools (IP addresses, cookies).

PERSONAL DATA PROCESSING OPERATIONS: It includes all activity that affects personal data, regardless of the means - automated or not - through which it is carried out, such as "collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" in accordance with the GDPR.

PROCESSING WHICH DOES NOT REQUIRE IDENTIFICATION: It's not data the anonymous information or those which are made anonymously so that the subject is not - or is no longer - identified or identifiable ("anonymous data"). On the other hand the "pseudonymisated" data, which allows the subject to be identified through additional information (eg. encrypted email address or a user ID) it's considered personal data.

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Whenever in the processing of personal data PEDRO CÉSAR SAMPAIO E SOUSA has not obtained, doesn't maintain or doesn't treat information that allows to identify a data subject, it's only obliged to observe their rights if the data subject has provided additional information. This happens, for example, when anonymous or anonymised data are treated.

DECISIONS BASED ON AUTOMATED DATA PROCESSING: "Automated processing" comprehends operations carried out using automated processes, for example: registration of data, application to such data of logical and/or arithmetic operations, but also its modification, suppression, extraction or diffusion. The data subjects will not be subjected to decisions taken exclusively on the basis of automated processing of their personal data - especially for the creation and evaluation of profiles based on the qualities of the person or their particular situation, determination of habits, interests or behaviors -, unless they expressly consent to this. Exceptions will occur if automated processing is necessary for the celebration or execution of a contract in which the data subject is a party or if such is legally established. In all cases, the data subjects will be duly informed that such processing will be performed, what are the reasons for it and what consequences might exist for their rights, freedoms and interests. They will also be informed that they have the possibility of:

- .1 Refusing that their data are treated in this terms.
- .2 Getting human intervention by PEDRO CÉSAR SAMPAIO E SOUSA in the processing.
- .3 Manifesting their point of view and contesting the decision.

B. PROCESSING LEGAL BASIS

The processing operations of personal data carried out by PEDRO CÉSAR SAMPAIO E SOUSA will always be subject to verification of a legal basis, which may be:

PERFORMANCE OF A CONTRACT TO WHICH THE DATA SUBJECT IS PARTY OR IN ORDER TO TAKE STEPS AT THE REQUEST OF THE DATA SUBJECT PRIOR TO ENTERING INTO A CONTRACT: The processing operations of personal data based on a contract that the data subjects has submitted or intends to submit (eg. employment contract, provision of a service or the sale of a good), depend on their need to celebrate the intended contract, to the extent that this is duly justified and documented. This data may be used to prepare commercial offers and contract proposals, following the request of the data subject related to the execution and/or conclusion of the contract.

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LEGAL OBLIGATION: The data subject's data may be processed if this is required by European Union or Member State legislation, as is the case of Portugal.

PURPOSE COMPATIBLE WITH THAT FOR WHICH THE DATA WERE INITIALLY COLLECTED: If the data is collected for one purpose it can be used for another that is compatible with it. In these cases it isn't necessary to justify the processing of personal data with a legal basis different from the one that allowed the initial collection of those data. However, PEDRO CÉSAR SAMPAIO E SOUSA should verify:

- .1 The compliance of the licit requirements of the initial process.
- .2 The existence of a link between the first purpose and the one intended for the new processing operation.
- .3 The context in which the personal data were collected, in particular the reasonable expectations of the data subject in their subsequent use, based on their relation with the data controller.
- .4 The personal data's nature.
- .5 The consequences that the subsequent processing of the data may have for the data subject.
- .6 The existence of appropriate safeguards both in the initial process and in the other planned processing operations.

LEGITIMATE INTERESTS PURSUED BY THE PROCESSOR OR BY A THIRD PARTY: The processing of data based on the interests of PEDRO CÉSAR SAMPAIO E SOUSA or any partners may only be lawful if it does not imply that any fundamental right or interest of the data subject is neglected. There may be legitimate interest when:

- .1 There is a relevant and appropriate relationship between PEDRO CÉSAR SAMPAIO E SOUSA and the data subjects (for example, in case the data subject is a client or employee), and they can expect additional process of their data.
- .2 Data processing is necessary for the prevention and control of fraud.
- .3 Data processing serves direct marketing effects.

CONSENT: Consent will be the last ground of data processing to be used by PEDRO CÉSAR SAMPAIO E SOUSA, to justify the data processing operations it performs. PEDRO CÉSAR SAMPAIO E SOUSA will only request the consent of the data subject for the process of their data, when there is no other legit basis. Whenever possible, the consent will be documented.

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Consent will only be considered valid if it results from a positive and clear act and that reflects the free, specific, informed and unequivocal will of the data subject, regarding a certain process of their personal data, which may be withdrawn at any time.

There cannot be used any means to obtain the consent of the data subject, such as the use of pre-validated options or silence as a form of implied consent.

C. TIME AND PURPOSE OF PROCESS

The processing of personal data may also require the identification of a specific purpose of process and will always depend on the definition of the periods of time process and the consecutive conservation of the processed personal data.

ABOUT THE TIME: The processing of personal data must be carried out for the minimum period necessary, after which PEDRO CÉSAR SAMPAIO E SOUSA will cease the process activity or request the authorization from the data subject to continue the process of their data.

The duration of the processing operation may exceed the expected time limit if there are legal rules requiring process (in particular data conservation) for a longer period.

ABOUT THE PURPOSE: At the time of the collecting personal data, the data subjects must authorize the processing of his data in relation to one or more specific purposes communicated to them. In fact, if at the time of data collection the process activity that PEDRO CÉSAR SAMPAIO E SOUSA intends to conduct is associated with several purposes, the data subject must give consent to all of them.

D. PERSONAL DATA CATEGORIES

The GDPR in addition to defining the concept of personal data also introduced the need to categorize them, including through the adoption of obligations on the data controller in this regard.

PEDRO CÉSAR SAMPAIO E SOUSA, the processes the following categories of personal data:

CHILDREN UNDER 13 YEARS OLD DATA: It's a subject of special protection when the Data Controller collects and processes data of children under 13 years old, for purposes which do not only seek to protect their fundamental rights and interests. This happens specially when the data

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controller uses them for the purposes of marketing or to create personality or user profiles, as well as when it collects them to use services made available directly to children.

PEDRO CÉSAR SAMPAIO E SOUSA, within the scope of the business area developed by the ACADEMIA PEDRO SOUSA, collects data from this category, right from the moment its data subjects register for attendance in dance classes, filling in their registration form and providing their personal data for that purpose.

PEDRO CÉSAR SAMPAIO E SOUSA hereby undertakes to treat the data of these children only with the authorization of the holders of parental responsibilities, committing to the necessary efforts to obtain it. It also undertakes to comply with the requirements of simplicity and clarity which should guide the communications addressed to children and the information duty necessary in this context.

SENSITIVE DATA: the data that deserve further protection are thus categorized, since its process may not justify the risk on the rights, freedoms and interests of the data subject (namely, their right to privacy and other related rights).

PEDRO CÉSAR SAMPAIO E SOUSA only deals with data of this nature - mainly data concerning health - in relation to its employees in the area of Information Management of the Health, Safety and Hygiene Services at Work.

III. PERSONAL DATA IN THE BUSINESS STRUCTURE

Personal data relate to DATA SUBJECTS, which in the business area may be employees or other people with whom the company relates, mainly clients.

A. PERSONAL DATA FROM EMPLOYEES

In its activity, PEDRO CÉSAR SAMPAIO E SOUSA collects personal data from employees at various and different times:

IN THE FIELD OF RECRUITMENT AND HIRING: Recruitment can either be based on a process promoted by PEDRO CÉSAR SAMPAIO E SOUSA - namely with the advertising of job offers - such as receiving a *Curriculum Vitae* as spontaneous applications. PEDRO CÉSAR SAMPAIO E SOUSA has two emails for recruitment and delivery of spontaneous applications - **curriculos@academiapedrosousa.pt** and **curriculos@portdance.pt** – regarding ACADEMIA PEDRO SOUSA and PORTDANCE, so that all the information that the candidates refer to will be centralized in this addresses.

The recruitment procedure may imply that PEDRO CÉSAR SAMPAIO E SOUSA establishes several phases of information processing, ranging from the reception of the curriculum, to its evaluation and the ranking of candidates. Finally, recruitment culminates in negotiation and hiring, in which the data collected during the recruitment phase will be transversal to the employment contract to be celebrated.

This personal information – mainly **personal identifying data** such as name and contacts, and **academic and professional data** such as course certificates and work experience -, will be treated by PEDRO CÉSAR SAMPAIO E SOUSA, being guaranteed the confidentiality in its process, under the terms of this POLICY.

This process will always be done with human intervention and by reference to the legal term of conservation of 5 years.

IN LEGAL OBLIGATIONS COMPLIANCE: As for to the processing of employee data, there is a well-defined data processing format, which is based on existing legal obligations:

- .1 Submission of data to Social Security and accounting services, for registration and termination of employees at Social Security, or for the purposes of registration and termination of employees in the Wage Guarantee Fund.

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- .2 Data processing for time, holiday, distribution, maintenance of travel maps, among others required by the Labor Code.
- .3 Communication of fatal accidents or serious physical injury to the Working Conditions Authority.
- .4 Sending information to courts, solicitors and enforcement agents.
- .5 Sending information to Finance services, such as income statements for discounts.
- .6 Sending information to National Statistical Institute, for example for the purposes of official statistics about accidents at work.
- .7 Data communication to Safety, Hygiene and Health Services at Work.
- .8 Sending data to Insurance Companies for the purpose of celebration compulsory work accident insurance.

The transactions based on compliance of a legal obligation do not hurt the duty of PEDRO CÉSAR SAMPAIO E SOUSA regarding the limitation of data processing to the minimum necessary and the guarantees of security of this data.

PEDRO CÉSAR SAMPAIO E SOUSA will only collect the necessary data of its employees for the purposes of processing legally required.

IN THE FIELD OF SECURITY SERVICES INFORMATION MANAGEMENT, HYGIENE AND HEALTH AT WORK: PEDRO CÉSAR SAMPAIO E SOUSA, as an employer, is obliged to organize its Safety, Hygiene and Health at Work activities to prevent occupational risks and to promote employee health. For this, PEDRO CÉSAR SAMPAIO E SOUSA hires an external company to provide this service.

Personal data processed in the area of Health, Safety and Health at Work – such as the execution of reports to identify the risk of occupational disease - will be handled by safety technicians duly legally qualified and capable of ensuring the necessary security conditions. The health information, the technical responsibility, and effective process, shall concern the doctors, medical assistants and nurses at work.

All these professionals cooperate with each other in the performance of their duties, in full respect of the obligations of secrecy and confidentiality to which they are legally and professionally bound.

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Against the sensitivity inherent to employees' health data - such as information regarding their medical results, the occurrence of sick or accident -, and related to personal habits data - such as tendency to smoking -, PEDRO CÉSAR SAMPAIO E SOUSA undertakes to:

1. Ensure non-discrimination measures;
2. Control personal habits only when strictly necessary, when this information can be related to certain symptoms and other health data;
3. Ensure information security measures. This includes the proper preservation of documents in a secure manner and for the legally defined period of time, the adoption of internal measures regarding the circulation and access of such information, and the separation of these personal data from the others that circulate in the structure.

Regarding health information, PEDRO CÉSAR SAMPAIO E SOUSA will only have access to the employee's certificate of aptitude and other medical indications that are necessary for the performance of his duties and that aren't covered by professional secrecy.

In organizational terms, each employee will be associated with an "individual clinical file" which will include all the registration related to health information about him. This will integrate the "medical information" entered by the health professional responsible for assisting the employee in the field of Occupational Medicine, namely, the results of the medical examinations performed.

Access to health information by the employee will always be done through an intermediary of the health professional who assists him, without prejudice to the responsible doctor must deliver a copy of his clinical file when he ceases to provide service in the company.

Records and archives relating to occupational health and safety services shall be kept for at least 40 years from the end of exposure to the dangers inherent in their workplace.

RELATIONS WITH INSURANCE COMPANIES: In compliance with its legal obligations in terms of assignment of liabilities, PEDRO CÉSAR SAMPAIO E SOUSA interacts with insurance companies that cover work accidents of its employees.

Therefore it communicates with insurance companies, yielding information regarding the professional activity of the employee, such as wage and other regular remuneration (ex: food allowance) - and the accidents, by filling the insurance participation. It may also communicate non-detailed information on care provided to employees if it is strictly necessary for billing and collection of values, within the management of those health services.

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The health information of the employee will only be communicated to a health professional obliged to confidentiality indicated by the insurance company

ABOUT VIDEO SURVEILLANCE: In the access areas (entrance and exit of the facilities), parking areas and reception areas, PEDRO CÉSAR SAMPAIO E SOUSA uses video surveillance systems, – duly authorized by the supervision authority – for the safety of all its employees, clients (especially the students of ACADEMIA PEDRO SOUSA) and other entities that relate to the academy. It's in this context that the employees' data and other visitors of PEDRO CÉSAR SAMPAIO E SOUSA's facilities will be processed, specially, their image.

PEDRO CÉSAR SAMPAIO E SOUSA will never use these resources to regularly film the execution of the work by its employees in order to control their activity, nor will use the data collected without the authorization of the data subjects, unless superior reasons superimposed, or if it's in the context of properly identified criminal investigations.

In this regard, the data will always be duly assured under this POLICY, being accessed only in the event of an alert or audit and will not be transferred to third parties.

During the time that PEDRO CÉSAR SAMPAIO E SOUSA is legally obliged to keep these data - 30 days - the data subject may exercise his rights under this POLICY. After the 30 days the recordings will be destroyed. This will not happen, of course, if superior reasons overlap, namely of public interest, and in the context of properly identified criminal investigations.

In places with video surveillance there will always be informative warnings to alert to this situation and the data subjects will be informed about the possibility of exercising their rights regarding these data with PEDRO CÉSAR SAMPAIO E SOUSA.

IN THE FOLLOW-UP OF GOOD MANAGEMENT HUMAN RESOURCES AND CONTRACTUAL RELATIONSHPS: As regards the management of jobs and the human structure of the company, PEDRO CÉSAR SAMPAIO E SOUSA adopts several administrative measures that involve the processing of personal data of its employees, such as:

1. Exchange of correspondence with employees, by email;
2. Implementation of business management programs (ERPs) organized by modules and associated with access policies;
3. Sending of internal communications, for example through circulars;
4. Conservation and destruction of *Curricula Vitae*;

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5. Celebration of work contracts;
6. Implementation of safe procedures for collecting personal information of the employee, namely to justify faults;
7. Communication of the employee's identification data to the services that provide him with health care in case of an accident, in case he is unable to do it on its own;

They are **essentially employee identification data** (name, employee number, professional category and possible contacts).

The employee will be informed of this POLICY and of the processing operations that PEDRO CÉSAR SAMPAIO E SOUSA carries out on their personal data. The data will be kept during the employment relationship, except if there are other legal deadlines, or if there are superior interests of PEDRO CÉSAR SAMPAIO E SOUSA or others, duly identified and defined, in which cases they can be kept for longer.

LEGAL DEADLINES FOR PERSONAL DATA CONSERVATION IN A WORK CONTEXT:

- .1 Data obtained during recruitment: 5 years. However, if the employee is hired, the data must be kept during the work relationship.
- .2 Employment contracts: up to 12 years after their end.
- .3 Registration documents and termination with the Social Security, Wage Guarantee Fund, Authority for the Conditions of Work: up to 12 years after the end of the employment contract.
- .4 Accounting elements, such as pay slip or the single report: up to 12 years after the end of the employment contract.
- .5 Obligatory elements for Safety, Hygiene and Health at Work - the term of retention is defined in 40 years, but there is an obligation to transfer all this data to the competent ministries if, before 40 years, the employer (PEDRO CÉSAR SAMPAIO E SOUSA) ceases to exist.
- .6 Elements of vocational training: up to 1 year after the end of the employment contract, but always 3 years after the employee's training.
- .7 Mandatory work records (such as time and holiday registration and working time map): the period of retention will be up to 1 year after the end of the employment contract, but the data may be kept for up to 12 years, and an assessment of the situation is required in each case.

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- .8 Insurance documents: at least 5 years, and, depending on the insurance policy, can reach the deadline of 1 year after the end of the employment contract.

B. PERSONAL DATA FROM SERVICE PROVIDERS

In the exercise of its activity, PEDRO CÉSAR SAMPAIO E SOUSA hires individual service providers (namely dance teachers), collecting and processing their personal data at various times, in particular in the context of pre-contractual procedures. During these business and hiring moments, personal information - mainly personal identifying information such as name and contacts, and academic and professional data such as course certificates, *curriculum vitae*, references and professional experience - can be collected by PEDRO CÉSAR SAMPAIO E SOUSA, and the confidentiality in its process is guaranteed, under the terms of this POLICY.

LEGAL DEADLINES FOR PERSONAL DATA CONSERVATION IN A SERVICE PROVISION CONTEXT:

- .1 Data obtained of *Curriculum Vitae* or similar: during the term of the contractual relationship.
- .2 Service contracts: up to 12 years after the assignment.
- .3 Accounting elements (invoices, income tax returns and others): up to 12 years after the assignment of the service contract.

C. PERSONAL DATA FROM CLIENTS

In its activities, PEDRO CÉSAR SAMPAIO E SOUSA collects personal data from clients at various and different times:

REGISTRATION IN THE DANCE CLASSES OF ACADEMIA PEDRO SOUSA: At the time of registration for attendance in dance classes of ACADEMIA PEDRO SOUSA, by completing the application form, personal data is collected for this purpose, such as: name, date of birth, mobile phone number, email, tax number, etc.

CAPTURING, REPRODUCING AND IMAGE DISCLOSURE: During classes, dance shows and other events promoted by PEDRO CÉSAR SAMPAIO E SOUSA, there may be photographic and video recordings, in which case there may be collection of personal data of the participants (students). Such photographs and videos may be disseminated not only in social networks used by PEDRO CÉSAR SAMPAIO E SOUSA, but also in promotional and institutional campaigns.

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Therefore, and considering that we are in the area of personality rights - right to image - at the moment they fill out the registration form of ACADEMIA PEDRO SOUSA, the data subjects of those personal data - or their legal representatives, in cases where they are under 13 years of age, - give their consent for that matter.

WEBSITE USE: Whenever personal data are collected in the use of PEDRO CÉSAR SAMPAIO E SOUSA's websites, its data subjects will be informed of this POLICY and of other existing policies designed to regulate the processing of personal data. This information shall be easily accessible and clearly provided and, when necessary, associated with a request for consent for the intended process of the collected data.

The use of technologies capable of controlling the behavior of the data subject, to define profiles of data subjects that use a website, to make decisions regarding the data subject, or simply to analyze preferences, behaviors or attitudes, implies the express authorization, requested before the actual collection of personal data, as long as they serve other purposes than the functional needs of your website.

BUY AND SELL: During the activity developed by PORTDANCE, PEDRO CÉSAR SAMPAIO E SOUSA may collect personal data of clients who wish to relate. The data provided under a contract may be used in pre-contractual procedures and execution of the contract itself to which the customer submitted.

The data will be used for budgeting, billing, credit and distribution notes, technical specifications, collaboration with processors.

PEDRO CÉSAR SAMPAIO E SOUSA shall comply with the information, registration and documentation obligations associated with personal data processing operations based on a contract, and other resulting from this POLICY.

NEWSLETTER SUBSCRIPTIONS BY EMAIL: Through the websites of PEDRO CÉSAR SAMPAIO E SOUSA - both regarding the PEDRO SOUSA ACADEMY (<https://www.academiapedrosousa.pt/>) and the one related to PORTDANCE (<https://www.portdance.pt/>) - their users can subscribe newsletters so that requests sending of information, offers, special promotions and other news related to the products marketed by PORTDANCE, as well as to the dance activities developed and promoted by ACADEMIA PEDRO SOUSA – that may interest the subscribers.

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The subscriber will always have at his disposal, in each newsletter, a command that will allow him to revoke the consent previously provided (unsubscribe option), just as easily as he gave it.

DATA SUBJECT VOLUNTARY COMMUNICATIONS: On its websites, PEDRO CÉSAR SAMPAIO E SOUSA provides contacts that are publicly available to its users. These contacts will be duly identified and limited as necessary, as they may be used for requesting information, clarifications and suggestions regarding the services provided, as well as for making complaints and other similar communications.

The retention period of this data shall be limited to the context of the communication established and the duration of the communication, except there are other deadlines resulting from legal provisions on the exercise of rights.

DATA PROCESSING OPERATIONS FOR ADVERTISING PURPOSES: Some of the data provided will be used to serve advertising purposes. This happens, for example, with the newsletters subscription.

Note that the marketing by electronic means will only be realized if there has already been commercial interaction between CÉSAR PEDRO SAMPAIO E SOUSA and data subjects and the communications sent for advertising allow the immediate cancellation of subscriptions.

If the data subject has not agreed to receive advertising, a communication will be sent to them with an invitation to subscribe, thus collecting the consent. PEDRO CÉSAR SAMPAIO E SOUSA will only process data for this purpose with the express consent of the subscriber, in particular, when he validates the option to newsletter subscription available on the websites, indicating the contacts (email address) to receive such advertising. That is, provided that the process is duly authorized by the data subject, knowing that the data in this content are voluntarily provided and that you can revoke your consent or oppose to this type of process at any time. When processing operations are carried out under this framework, the data subject will have at his disposal fast and effective procedures to exercise his rights of withdrawal of consent or object.

It is also reported that the websites managed by PEDRO CÉSAR SAMPAIO E SOUSA are associated with a database that may be in charge of subcontracted entities for this purpose and where all the information collected is kept.

These entities are subcontracted regarding they provide the necessary security for the data to which they have access and may have eventually and in the performance of their duties.

- PRIVACY AND PERSONAL DATA PROCESS POLICY -

It is further informed that a " PERSONAL DATA PROTECTION STATEMENT" is available on its websites about the personal data processing operations carried out on it, as well as a "COOKIE POLICY", which can be seen either on the ACADEMIA PEDRO SOUSA website - <https://www.academiapedrosousa.pt/>, or at PORTDANCE – <https://www.portdance.pt/>.

These policies are destined to the users of the websites at the moment of the personal data collection, and will be followed by a request for consent whenever this is deemed necessary. First of all, in the absence of a legitimate interest of PEDRO CÉSAR SAMPAIO E SOUSA to justify it.

At all times the data subject may exercise their rights in relation to them, including the special "right to forget". The exercise of this right implicates that PEDRO CÉSAR SAMPAIO E SOUSA immediately delete its data (including copies) from its databases in accordance with the efforts that are required, except if it doesn't have to fulfill such obligation under this POLICY terms.

LEGAL TERMS OF CONSERVATION IN CONTRACTUAL CONTEXT:

The legal deadlines will be added to the conservation periods according to the purpose of the data process.

1. Storage periods of books, accounting records, invoicing and respective supporting documents: 12 years.
2. Period of prescription of trader credits for goods sold to non-traders or who do not use them to trade: 2 years.
3. General prescription period, especially in case the client considers himself contractually injured: 20 years.
4. Prescription period of criminal procedure: 15 years.

LICIT CONSERVATION DEADLINES IN FUNCTION OF THE PROCESS PURPOSE:

1. Duration of the contract;
2. Term corresponding to the period during which subscription of newsletters is in force, without prejudice to the data being periodically deleted;
3. Term foreseen in the cookie policy regarding the expiration date of the data stored by these technologies;
4. Term during the period which the communications exchanged between the parties last;

The extension of these deadlines and the support to the data subjects' use of rights by PEDRO CÉSAR SAMPAIO E SOUSA will depend on the verification of superior interests that overlap,

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concretely of own legitimate interests, of third parties, or public interests as well as any other legal obligation that may be identified.

IV – PARTNERS AND SERVICE PROVIDERS

In a service context, PEDRO CÉSAR SAMPAIO E SOUSA may cooperate with other entities that treat personal data on their behalf ("processors"), or are authorized to have contact with them, or that deal with them in a purely incidentally way ("third parties"). Therefore, PEDRO CÉSAR SAMPAIO E SOUSA will have to transfer the personal data that for that people or those companies that may be: financial institutions, insurance companies, technical advisory service companies, entities of detection and prevention of fraud or provision of security services, medicine at work, and even service providers related to marketing and advertising.

This may include on one hand the provision of a cleaning service of its facilities, whose purpose is not to carry out personal data processing operations, and on the other hand the subcontracting of service providers which, in a contract execution will have to access and process data collected and initially processed by PEDRO CÉSAR SAMPAIO E SOUSA.

In these situations and for reasons of transparency, whenever possible, the data subjects will be informed of who these entities are and what they do with their data. On the other hand, where the rights, freedoms and interests of data subjects cannot be safeguarded because there are insufficient guarantees of protection, such transfer depends on their express consent.

The Partners and Service Providers that with PEDRO CÉSAR SAMPAIO E SOUSA relates with celebrate agreements of regulation of responsibilities in matter of data protection. Such agreements should be reduced to writing, and should also mention the object of the contract, with particular regard to the actual operation of data processing to be performed, their duration, purpose of processing, type of personal data processed and categories of personal data subjects involved.

The data subject may at any time request information about the terms in which their data are processed by PEDRO CÉSAR SAMPAIO E SOUSA's Service Providers and Partners.

PEDRO CÉSAR SAMPAIO E SOUSA will only agree to engage with entities that ensure the compliance of its obligations in the terms of this POLICY, (without prejudice to others that the parties consider to be the most advantageous for the data subject), namely:

- .1 No other entities may be subcontracted to process the data of the existing agreement with PEDRO CÉSAR SAMPAIO E SOUSA, without its previous and express written

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consent. And when they do, they must ensure that the subsequent processor complies with the other obligations of the GDPR on equal terms.

- .2 They may not transfer the personal data to people or entities outside the European Union, except when this is necessary by legal requirement or in the presence of a prevailing public interest, and shall inform PEDRO CÉSAR SAMPAIO E SOUSA.
- .3 They shall keep confidential all information to which they have access in the execution of the agreement.
- .4 They must have and maintain adequate and sufficient organizational measures to ensure that the personal data processing operations carried out comply with the requirements of the GDPR, in particular with regard to the protection of the rights of the respective data subjects and the security of mentioned processing, in order to assure the safety of the personal data processed.
- .5 They must delete or return to PEDRO CÉSAR SAMPAIO E SOUSA the personal data to which they have access, at the end of the agreement signed, erasing all existing copies, unless there is a legal obligation or a priority public interest, and must inform PEDRO CÉSAR SAMPAIO E SOUSA.
- .6 They shall make available to PEDRO CÉSAR SAMPAIO E SOUSA all information necessary for it to comply with its obligations under the GDPR, facilitating and contributing to audits, inspections and other examinations.
- .7 They shall keep written records of personal data processing operations carried out on behalf of PEDRO CÉSAR SAMPAIO E SOUSA under the terms of the GDPR, making records available to the CNPD.
- .8 They may not process personal data for any other purpose than the one of the service, let alone to pursue their own interests.
- .9 They shall provide the necessary training in data protection to authorized personnel to process personal data.
- .10 When necessary, they should designate a Data Protection Officer and reveal his contacts to PEDRO CÉSAR SAMPAIO E SOUSA.
- .11 When they consider that their instructions are contrary to the GDPR, the law of the European Union or of the Member States they should inform PEDRO CÉSAR SAMPAIO E SOUSA.

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Whenever PEDRO CÉSAR SAMPAIO E SOUSA appears as a Partner or Service Provider in an agreement entered into with another entity, it shall act in accordance with the guidelines and instructions provided by that Data Protection Officer and in accordance with this POLICY.

V. PRINCIPLES THAT BIND THE PROCESS OF PERSONAL DATA

LAWFULNESS: Personal data will only be processed when there is a legitimate and legal basis in total safeguarding of the data subject's rights.

TRANSPARENCY: All communication and information related to personal data processing operations shall be easily accessible and formulated in clear and precise language. PEDRO CÉSAR SAMPAIO E SOUSA privileges the collection of personal data from the data subject, acting as far as possible to safeguard that he is properly informed about the processing operations conducted on his personal data.

PURPOSE LIMITATION: Personal data will only be processed when the purposes of process cannot be achieved by other ways.

DATA MINIMIZATION AND RESTRICTION OF PROCESSING: Only appropriate, relevant and limited personal data will be used in accordance with the purposes for which they are processed, and will only be kept for at least the minimum period required for processing. PEDRO CÉSAR SAMPAIO E SOUSA guarantees to establish periods of data retention for each process operation that concerns them, after which they will be erased, further committing itself to review, regularly and periodically, the legality of the data processed. Whenever possible, the personal data used should be anonymised.

ACCURACY, INTEGRITY AND FAIRNESS OF DATA: In order to prevent the personal data being treated improperly, PEDRO CÉSAR SAMPAIO E SOUSA adopts measures capable of keeping this data correct and up to date, namely against its loss, destruction or damage, or else they will be erased.

CONFIDENTIALITY: The personal data will be treated in a way that guarantees the proper security and confidentiality.

VI. DATA SUBJECTS RIGHTS

The privacy of the person is an increasingly privileged fundamental right.

A. DATA SUBJECTS RIGHTS

RIGHT OF ACCESS: The data subject may request to PEDRO CÉSAR SAMPAIO E SOUSA to access the data that they provided, as well as to seek from that person the information related to their processing – about who actually processes their personal data, the associated processing times, the categories of data, and even their rights.

RIGHT OF RETIFICATION: The data subject can and should rectify them, and PEDRO CÉSAR SAMPAIO E SOUSA shall not be liable for damages resulting from the negligence of the data subject in the rectification of his data, whenever the pertinent and appropriate security measures have been taken.

RIGHT TO RESTRICTION AND ERASURE (RIGHT TO BE FORGOTTEN): When the data subjects understands that the presented privacy policies are not sufficient and want "to be forgotten" of the databases of PEDRO CÉSAR SAMPAIO E SOUSA, they may request the restriction of processing of all or some of the personal data processed and at the limit request the erasing of them in cases they:

- .1 Verify that the data kept is not accurate.
- .2 Consider or not that the data are unnecessary for the purposes for which they were collected.
- .3 In case of exercise of the right to object.
- .4 If the data is treated unlawfully.
- .5 To comply a legal obligation.
- .6 When consent for process was given by a minor.

RIGHT TO PORTABILITY: The data subject may request portability of his personal data by completing and submitting a "PERSONAL DATA PORTABILITY REQUEST" form sent to PEDRO CÉSAR SAMPAIO E SOUSA or directly to the Data Protection Officer.

Provided that this is technically possible, in structured format, of current use and machine-readable, the data requested must be transferred.

- PRIVACY AND PERSONAL DATA PROCESS POLICY -

RIGHT TO OBJECT: Whenever personal data processed is used to safeguard the legitimate interests of PEDRO CÉSAR SAMPAIO E SOUSA, or of its, or when there are public interests, and the data subject understands that the way in which his personal data are treated is not the best suited to their particular situation or does not serve the purposes for which they were provided, he has the right to object such process.

Whenever it assists data subjects in the exercise of his rights, PEDRO CÉSAR SAMPAIO E SOUSA may request additional information in order to prove the ownership of the data and nature of the request and may, if appropriate, charge fees associated with this data provision service.

PEDRO CÉSAR SAMPAIO E SOUSA is not obliged to assist the requests of the data subjects if it results from legal provisions, in particular as it happens with the deadlines of prescription or expiration of credits.

B. GUARANTEE OF THE DATA SUBJECT RIGHTS

This Policy aims primarily informative and transparency purposes, not invalidating the personal data subject who feel impaired in their rights to relieve the means appropriate to their guardianship.

The data subject can submit complaints to the CNPD or resort to courts or try to resolve his situation directly with PEDRO CÉSAR SAMPAIO E SOUSA or its Data Protection Officer.

For the purpose of processing complaints, the data provided will be processed according to the duration of the communication established and the time required to resolve the conflict presented.

C. INFORMATION OBLIGATION

In addition to other information duties reflected in this POLICY, the data subjects treated by PEDRO CÉSAR SAMPAIO E SOUSA, will be informed about:

1. The identity and contacts of PEDRO CÉSAR SAMPAIO E SOUSA;
2. The Data Protection Officer contacts;
3. The purposes of the processing to which personal data are intended or the legal basis for that process;
4. The recipients or categories of recipients of personal data;
5. The transfer of personal data to a third country or an international organization and the existence or not of a compliance decision adopted by the European Commission;

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6. The existence of legitimate interests of PEDRO CÉSAR SAMPAIO E SOUSA or a third party, underlying the data processing;
7. The period of retention of personal data or, if not possible, the criteria used to define this period;
8. His rights and the way of exercise them;
9. The existence of automated decisions, including the definition of profiles and the following consequences.

VII. PERSONAL DATA TRANSFER

PARTNERS COOPERATION: PEDRO CÉSAR SAMPAIO E SOUSA cooperates with partners who may treat personal data on the behalf of the data subject (processor) or deal with them purely incidentally (third parties). An example is the provision of a cleaning service for its premises, the purpose of which is not to carry out personal data processing operations (although there may be in contact with them); as it may hire service providers who will have to access and process data of employees of PEDRO CÉSAR SAMPAIO E SOUSA in the execution of a contract.

In every case, PEDRO CÉSAR SAMPAIO E SOUSA will take appropriate measures to ensure that its partners and clients comply with all their obligations regarding the protection of personal data that are the object of the processing operations it leads, and ultimately, take responsibility for its realization, under the terms of this POLICY.

With this in mind all partners must agree to maintain a level of protection of personal data equivalent to the one incorporated in this POLICY.

Whenever fundamental rights, freedoms and interests of the data subjects cannot be adequately safeguarded - in particular as there are no relevant and sufficient safeguards for the protection of their data - such transfer depends of express consent.

Regardless of this, there may be data transfer - to third countries or international organizations - for reasons relating to:

1. Legal requirements;
2. Protection of data subjects, for example, to prevent spam or attempts to defraud users of our products, or to help prevent serious injury or loss of life;
3. Operability and maintenance of the security of the company's services, including stopping or preventing of attacks on computer systems or networks;
4. Protection of company rights, including the application of the terms governing the use of services - in such situations, the private life of the subject cannot be investigated for the offender's own account, but the latter may report the issue to the competent authorities;
5. Contractual requirements promoted by the data subject.

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PEDRO CÉSAR SAMPAIO E SOUSA will always ensure the security of the personal data transferred to it, as well as those to which it has access and treats in compliance with this POLICY.

VIII. CONFIDENTIALITY

Personal data processing operations - either done directly by PEDRO CÉSAR SAMPAIO E SOUSA or indirectly by processors - are covered by a duty of confidentiality that is transversal to its employees.

In this way, employees and other professionals are prohibited from accessing personal data without authorization (as part of their duties) and dispose of them in violation of the contractual terms to which they are linked. They shall be informed of this duty of confidentiality which binds them under the contracts celebrated with PEDRO CÉSAR SAMPAIO E SOUSA, even after termination of their duties, although different solutions may result from European legislation.

PEDRO CÉSAR SAMPAIO E SOUSA will establish policies for accessing personal data due to the needs arising from the functions inherent to the various workstations in its structure, and the principle of "need for information" will be respected, preventing the misappropriation of personal data object of the processing operations conducted.

IX. DATA PROTECTION IMPACT ASSESSMENT

The GDPR stipulates that the Controller has the burden of implementing effective measures and procedures in the protection of the rights and freedoms of natural persons in order to mitigate the high risks that fall upon when processing their personal data.

Whenever the processing of personal data held by PEDRO CÉSAR SAMPAIO E SOUSA raises doubts as to whether or not it poses a high risk to the rights and freedoms of natural persons, they must carry out an Impact Assessment "in order to assess the particular likelihood and severity of the high risk, taking into account the nature, scope, context and purposes of the processing and the sources of the risk"- in accordance with recital (90) of the GDPR.

That obligation is also extended to the processors with whom it relates.

In addition, PEDRO CÉSAR SAMPAIO E SOUSA undertakes to conduct such evaluation when:

- .1 Introduces new technologies in data processing operations.
- .2 Makes a large-scale data processing operation that implicates high risk for the exercise of the data subjects rights, in particular because of the sensitivity of these data.
- .3 Uses a new technology massively and for large-scale data control.
- .4 Treats personal data in order to take decisions based on automated processing of data, in particular following any systematic and complete assessment of personal aspects related to natural persons based on the definition of the profiles of those data or following the processing of special categories of personal data.
- .5 Introduces a system of systematic control of large-scale publicly accessible areas.

PEDRO CÉSAR SAMPAIO E SOUSA shall use these assessments to demonstrate the proper fulfillment of its duty to protect personal data, obliging itself to request the opinion of personal data subjects or the opinion of CNPD whenever necessary.

To this end, it shall be guided by transparent and effective procedures capable of:

- .1 Performing a systematic description of processing operations and purposes.
- .2 Evaluating the necessity and proportionality of the processing operations.
- .3 Identifying existing safety and control mechanisms.
- .4 Assessing the risks to the rights and freedoms of data subjects.
- .5 Developing risk mitigation measures.
- .6 Identifying the periodicity of the Impact Assessment realization.

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- .7 Verifying if the Supervision Authority has to be previously consulted. This happens when: the impact assessment results in the verification of the lack of guarantees and of security measures and procedures to mitigate the high risks that the process entails for the rights and freedoms of natural persons, and the Controller considers that the risk cannot be mitigated taking into account the available technology and application costs.
- .8 Determining when assistance from a processor will be required to ensure the compliance of the obligations arising from impact assessments realization.

X. DATA BREACHES

A. OBLIGATION TO REPORT INCIDENTS

Whenever there is any type of incident that represents a breach of the personal data (Data Breach), the Data Protection Officer must be advised, as well as PEDRO CÉSAR SAMPAIO E SOUSA, when they have been their employees or partners to notice the occurrence.

The data subjects shall be informed of the violation of their data - without undue delay - when the incident presents a high risk to their fundamental rights, freedoms and interests through a written communication in clear language which informs:

1. About the contacts of the Data Protection Officer or the responsible person in the company so that more information can be requested;
2. About the expected consequences of the breach occurred;
3. About the company's ability to ensure the continued confidentiality, integrity, availability and resilience of data processing systems and services;
4. About the ability to restore availability and access to personal data quickly, in the event of a physical or technical incident;
5. About the process to regularly test and evaluate the effectiveness of technical and organizational measures to ensure the process safety.

This obligation shall not apply if existing or adopted technical and organizational measures are sufficient and appropriate for the protection of the data subjects or if it involves a disproportionate effort. In those cases a public communication is made for that purpose.

B. COOPERATION AND COMMUNICATION WITH THE CONTROL AUTHORITY

Whenever an incident of personal data violation causes a risk to the rights, freedoms and fundamental interests of its subjects, PEDRO CÉSAR SAMPAIO E SOUSA will inform the CNPD about the occurrence, as soon as possible and within a maximum period of 72 hours, under penalty of having to justify its delay.

Possible processors with whom PEDRO CÉSAR SAMPAIO E SOUSA relates are obliged to report occurrences or incidents of personal data breaches immediately after knowing the facts.

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There should exist reports that document the violations that occur and that identifies the remedial measures adopted in view of the need to repair present damages and to mitigate future damages; as well as fast and efficient communication mechanisms and procedures.

PEDRO CÉSAR SAMPAIO E SOUSA will cooperate, along with the processors with whom it relates, with the CNPD, sending of reports, requests of opinions and guidelines, and always that this entity requests.

XI. PERSONAL DATA PROTECTION OFFICER

DATA PROTECTION OFFICER:

HEDA - ENCARREGADOS DE PROTEÇÃO DE DADOS

Rua João Ramalho , n.º 141

4200-292 Porto (Portugal)

(+351) 220 995 423

info@hedadpo.pt

Having designated a Data Protection Officer for the good compliance of the GDPR, PEDRO CÉSAR SAMPAIO E SOUSA will ensure that he performs its duties independently, that will not be instructed in his performance and will be removed or penalized for doing his job. He will also not be liable for civil or criminal organization shortfalls which it operates or who provides functions, or be used as an "alibi" for non-compliance.

PEDRO CÉSAR SAMPAIO E SOUSA will ensure that the Data Protection Officer is involved in all matters related to data protection, supporting him in the performance of its duties, providing him with the necessary resources to perform to work and maintain his knowledges, giving him access to all the documentation; allowing him access to personal data and processing operations, as well as other services inside the organization. Will also involve him in the following aspects:

1. Registration or inventory of personal data;;
2. Development and implementation of data protection policies and internal process procedures;
3. Security control;
4. Drafting and alteration of contracts;
5. Privacy notifications;
6. Possible complaints and lawsuits;
7. Data Breaches.

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The exercise of Data Protection Officer functions foresees an obligation of secrecy and confidentiality of all the information of which it has knowledge in the exercise of its activity. These functions consist of:

1. Advising, monitoring and controlling the compliance of data protection rules, informing and advising PEDRO CÉSAR SAMPAIO E SOUSA, its partners and employees about the obligations under the GDPR;
2. Promoting the training and awareness of the entities with whom PEDRO CÉSAR SAMPAIO E SOUSA relates in data protection matters, especially its employees;
3. Performing periodic audits to check compliance with the RGPD;
4. Advising, controlling and issuing opinions in the ambit of Impact Assessments;
5. Collaborating with the CNPD and acting as a contact point with the CNPD, notifying it of the most risky control operations for data subjects and monitoring the implementation of their recommendations;
6. Relating to data subjects in particular in the exercise of their rights.

The contacts of the Data Protection Officer will be disclosed on the websites of PEDRO CÉSAR SAMPAIO E SOUSA, so that data subjects who wish to clarify any question or exercise any right, can do so directly.

XII. SECURITY AND PRIVACY IN DATA PROCESSING: INFORMATION AND COMMUNICATION TECHNOLOGIES, AND OTHER SAFETY MEASURES

PEDRO CÉSAR SAMPAIO E SOUSA is committed to ensure the protection and security of the personal data available to it through the implementation of physical and logical security measures against its diffusion, loss and misuse, as well as against its process or unauthorized access or any other form of illicit process.

This implies, firstly, that access points to personal data must be properly identified, authenticated and restricted by policies granting access rights and privilege, for the protection of data against unauthorized and improper access, against their loss, destruction and corruption (regardless of data being digitally processed or not). It also implies that the data stream provides for the encryption of the data, as well as other measures that allow the secrecy of the transmitted information.

All data processing operations shall be properly monitored and recorded not only for control purposes but also for evidence of data protection. Such monitoring and recording system shall:

1. Identify where the data is processed;
2. Identify the controller, processors, third parties and the data protection officer;
3. Identify the purpose of processing;
4. Categorize the data and describe its categories;
5. Record details of the flow of data transfers: categories of recipients, proof of adequate guarantees, etc.;
6. Generally describe the implemented security measures (technical and organizational), for example, by reference to internal policies, standards, etc.
7. Update the collected information and ensure the maintenance of the integrity of his content.
8. Involve “backup data up to date” and “disaster recovery testing” systems.