

# PRIVACY POLICY

**NUCASE - CONTABILIDADE E FISCALIDADE, S.A.**, hereinafter referred to as “NUCASE” with head office at Avenida General Eduardo Galhardo, 115, Edifício NUCASE, 2775-564 Carcavelos, processes the personal data of its employees, candidates, service providers, clients and suppliers in strict compliance with the privacy and personal data protection rules contained in the General Data Protection Regulation (hereinafter referred to as “GDPR”), approved by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

This Privacy Policy aims to inform the form and purposes of processing, for how long the data will be kept, as well as to inform the rights of the data subjects and the ways to contact NUCASE.

## **Responsible for Data Processing**

NUCASE is responsible for the processing of personal data, as it determines the purposes and means of processing the personal data of its employees, candidates, suppliers, clients and service providers.

## **Types of Personal Data Processed**

Personal data is any information relating to an identified or identifiable. An identifiable natural person can be identified, directly or indirectly, in particular by reference to an identifier, such as in particular by respect to a name, an identification number, location data, electronic identifiers, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

On the NUCASE website, we only collect the identification data necessary to contact you: name, e-mail and telephone number. For application purposes, we will collect your Curriculum Vitae and all other documents with personal data sent by you.

All clients are entitled to access the area reserved for clients on the NUCASE website, i.e., the “Client Portal”, using the username and password provided by NUCASE when they became clients. NUCASE collects the data of its clients necessary for the execution of the contract at the time of contracting the services.

## **Purposes of Processing Personal Data and Legal Basis**

When you fill in the fields of the “Message” form on our website, NUCASE collects your personal data and processes them solely to respond to your questions and requests or provide you with the information requested by you. The legal basis for processing your data is the performance of a contract or pre-contractual steps at the data subject’s request and legitimate interest.

In the event you subscribe to the NUCASE newsletter, by email or via our website, the personal data you provide will be processed only for the purpose of NUCASE sending you the newsletter. The legal basis for processing your data is based on your consent.

If you register for one of our events, workshops, seminars, or conferences, your personal data will only be used to register and enrol participants in these events. Please note that some of your personal data may be shared

with event organisers. The legal basis for the processing of your data is the execution of a contract as well as a legitimate interest.

In the event you send an application to collaborate with NUCASE by email or via our website, your personal data is collected by NUCASE and processed for the purposes of the recruitment process. The legal basis for processing your data is for pre-contractual diligence at the request of the data subject and NUCASE's legitimate interest. If you consent, NUCASE will only keep your data to be considered in future applications.

When you fill in the fields of the "Request for Assistance" form via our website, NUCASE collects your personal data and processes it for the purpose of responding to the request for assistance/support within the scope of the information systems. The legal basis for processing your data is the execution of a contract as well as a legitimate interest.

If you request remote assistance through our website, your personal data will be collected and processed by NUCASE for this purpose. The legal basis for such processing is the performance of a contract as well as a legitimate interest.

When you contract our services, NUCASE may contact you to market its services, provided that you have consented to process your personal data for this purpose. The legal basis for the processing of your personal data is your consent.

### **Time Limits for Storing Personal Data**

Our policy is to retain personal data only for as long as is necessary for the purposes for which the data is processed.

Personal data (name, e-mail and telephone) processed to respond to requests for information will be kept for two years if no further contact is made by the data subject or the company does not become a customer, and the data will not be shared with third parties.

Personal data, which is processed to send newsletters, will be kept for ten years.

The retention period for personal data collected when registering for events, conferences, workshops and training actions will be 2 years counted from the contact or participation in the event if there is no contact or involvement in another event by the data subject.

The personal data of job applicants kept for the purpose of future applications will be held for four years.

Personal data for the purpose of requests for assistance and remote assistance requests shall be kept for as long as the company is a NUCASE client, and their conservation shall respect the guarantees of secrecy and confidentiality recommended by the GDPR.

Personal data collected for marketing purposes and for sending advertising will be stored for a period of ten years.

Data for billing and accounting purposes will be kept for 10 years.

Once the maximum storage period has elapsed, personal data will be anonymised irreversibly anonymised or securely destroyed.

### **Transmission of your Personal Data**

NUCASE does not transmit your personal data to third parties, except in cases where this is necessary for the provision of services by NUCASE, namely to providers of IT, technical and operational support service providers, or when required to comply with legal obligations to which NUCASE is subject.

## Rights of Data Subjects

At any time, data subjects have the right to request:

### a. Access to personal data concerning him or her.

The data subject shall have the right to confirm whether or not data concerning him or her is being processed and, where appropriate, to access his or her personal data and access the information provided for in the GDPR.

### b. The rectification of inaccurate personal data.

The data subject shall have the right to obtain from NUCASE the rectification of his or her personal data that is inaccurate or incomplete personal data.

### c. The erasure of their personal data (“Right to be Forgotten”).

The data subject has the right to request NUCASE to erase his or her personal data held in NUCASE’s records, and NUCASE has an obligation to erase the personal data when one of the following reasons applies:

- The personal data is no longer necessary for the purpose that motivated its collection or processing;
- The data subject has withdrawn his/her consent to the processing of the personal data (in cases where the processing is based on consent), and there is no other legal basis for such processing;
- the data subject opposes the processing, and there are no overriding legitimate interests, which justify the processing;
- The personal data has been unlawfully processed.

### d. The limitation of the processing of their personal data.

The data subject has the right to request NUCASE to limit the processing of their data if one of the following situations applies:

- Contest the accuracy of their personal data for a period that allows NUCASE to verify its accuracy;
- The processing is unlawful, and the data subject opposes the erasure of personal data and instead requests the limitation of their use;
- NUCASE no longer needs personal data for processing purposes, but such data are required by the data subject for the establishment, exercise or defence of a right in legal proceedings;
- has opposed the processing until it is ascertained that the legitimate reasons of the NUCASE legitimate reasons prevail over those of the data subject.

### e. Data portability

The data subject shall have the right to receive the personal data concerning him/her that he/she provided to NUCASE, in a structured, commonly used and machine-readable format and the right to transmit such data to another controller without NUCASE being able to prevent this as well as have the right to have their personal data transmitted directly between controllers, whenever technically possible, when:

- The processing is based on consent given or a contract; and
- The processing is carried out by automated means.

### f. Opposition to the processing of your personal data

In cases in which the processing of personal data is carried out for the purposes of the legitimate interests of the NUCASE or the purposes of direct marketing or profiling, the data subject shall have the right to object at any time to the processing of their personal data.

g. If processing depends on your consent, you have the right to withdraw it. If consent is legally necessary for the processing of personal data, the data subject has the right to withdraw consent at any time, although this right shall not compromise the lawfulness of the processing carried out based on the consent previously given nor the subsequent processing of the same data based on another legal basis, such as the fulfilment of the contract, of the legal obligation to which NUCASE is subject or of the legitimate interest of NUCASE.

If you wish to exercise any of these rights, you should contact NUCASE, via the e-mail address [dpo@nucase.pt](mailto:dpo@nucase.pt), or by letter addressed to NUCASE, at the following address Avenida General Eduardo Galhardo, 115, Edifício NUCASE, 2775-564 Carcavelos.

Please note that you may be asked to provide proof of your identity in order to ensure that personal data is only provided to the data subject.

NUCASE shall provide information on the measures taken to comply with the request for the exercise of rights by the data subject within one month of receipt of the request.

If the request is submitted by electronic means, the information shall, where possible, be provided by electronic means unless the data subject requests otherwise.

If there is a legally imposed rule or obligation that overrides the aforementioned rights, your request cannot be granted. In this case, NUCASE shall inform you within one month of the request being made, stating the grounds.

You also have the right to complain to the National Commission for Data Protection:

<https://www.cnpd.pt/cidadaos/pedidos-de-informacao/>

### **Security of Personal Data**

NUCASE has applied measures of a technical and organizational nature in order to ensure the protection of personal data and prevent security breaches and the access of unauthorized persons to personal data, as well as their accidental or unlawful destruction, loss or alteration.

NUCASE respects the confidentiality of your information. Consequently, it does not sell, or in any way make the information commercially available to any third party. NUCASE is committed to keeping your information confidential under the terms of this Privacy Policy and the applicable legislation. NUCASE requires confidentiality from all its employees about any personal information they have access to.

Note that only authorized employees have access to personal information.

### **Changes to the Privacy Policy**

NUCASE may modify its Privacy Policy at any time. The most up-to-date version will always be available on this website.

### **Our contact details**

For any questions regarding the processing of your personal data, please contact the data protection officer (DPO) at the following contact:

Address: Avenida General Eduardo Galhardo, 115, Edifício NUCASE, 2775-564 Carcavelos

E-mail: [dpo@nucase.pt](mailto:dpo@nucase.pt)

Carcavelos, 19 June 2019