

## **Privacy Policy**

At **COFIIM - Consultoria, Lda.**, we are committed to protecting your personal data, and respecting your right to privacy.

Our privacy policy explains how we collect, use, process and protect your personal data in accordance with the General Data Protection Regulation (GDPR), as of 27 April 2016, and other applicable legislation.

### **Personal Data**

Personal data means any information related to a natural person, identified or identifiable, directly or indirectly, in particular by name, photograph, identification number, or any other identification element provided for in the current legislation.

### **Entity Responsible for Processing:**

The entity responsible for the collection and processing of data is **COFIIM**, taking into account the nature, scope, context and purposes of data processing, as well as the risks to the rights and freedoms of natural persons, in accordance with the GDPR.

### **Personal Data Collection**

**COFIIM** is committed to protecting the privacy of the users of its services by developing and using technologies which guarantee the best levels of security and privacy.

Users are mostly given the option to browse the **COFIIM** site without providing personal data. Sometimes, however, some information which is essential for the provision of and access to services is collected and stored.

### **Processing of Personal Data**

**COFIIM** respects your right to privacy and does not collect personal data other than that which you voluntarily provide to us by filling a form, or by any other legitimate means. By providing personal data to **COFIIM**, the user acknowledges and consents that it will be processed in accordance with this privacy policy, which guarantees that it will only be used for the purposes described at the time of collection.

Whenever personal data is collected by **COFIIM**, the collection of which is dependent on the consent of the data subject, information is given on the specific, defined, explicit and legitimate purposes of the collection.

Should the processing of personal data for a purpose other than that initially described be justified, we will always request explicit consent for this purpose, with the exception of cases in which the processing is lawful without consent, in accordance with the current legislation.

### **Lawfulness of the Processing of Personal Data**

In accordance with the current legislation on the protection of personal data, **COFIIM** may also lawfully process your personal data in specific situations, such as:

1. where processing is necessary for the performance of a contract to which the data subject is party or for pre-contractual diligences at the request of the data subject;
2. where processing is necessary to comply with **COFIIM** 's legal obligations;

3. where processing is necessary in order to protect the vital interests of the data subject or of another natural person;
4. where processing is necessary for the purposes of the legitimate interests pursued by **COFIIM** or a third party, except where the interests, fundamental rights or freedoms of the data subject require protection of personal data;
5. where processing is necessary for the purposes of carrying out obligations and exercising specific rights of **COFIIM**, or of the data subject, in relation to labour law, social security and social protection under the terms of the GDPR.

### **Confidentiality**

The information collected is for use by **COFIIM** in accordance with the purposes stated at the time of collection or to comply with legal obligations.

The information collected will be treated confidentially and may be accessed by a restricted group of **COFIIM** employees, in compliance with their professional duties, within the strict limits and for the purposes of the performance of their functions.

### **Protection of Personal Data**

**COFIIM** will apply appropriate and necessary technical and organisational measures to protect the information stored in the system against access, use, modification or removal of personal data.

Personal data shall be stored for the minimum period of time necessary for the specific purposes of the processing which led to its collection or subsequent processing, in compliance with the current legislation.

### **Rights of the data subject**

The data subject has the right to request access to his personal data at any time, as well as to request their rectification or erasure, to restrict their processing, to withdraw their consent and to exercise any other rights provided for by law, within the limits of the current legislation.

Should you withdraw your consent, this shall not affect the lawfulness of the data processing carried out on the basis of the consent previously given.

The data subject also has the right to be notified in case of violation of their personal data, in accordance and under the terms of the GDPR.

For questions related to the processing of personal data and the exercise of your rights under the GDPR, please contact us at [info@cofiim.pt](mailto:info@cofiim.pt)

### **Applicability**

Generally, this privacy policy applies to all services provided by **COFIIM**, without prejudice to other policies, agreements or legislation applicable in more specific contexts of collection and processing of personal data.

### **Changes to this Policy**

**COFIIM** may change this privacy policy whenever technically or legally justified.

The changes will apply to new processing of personal data; if the changes have an impact on the processing of personal data already collected, **COFIIM** will inform the data subject about the changes so that they can give explicit consent, or assert their right to object or to erasure.

### **Collection of technical / anonymous information**

*This website collects anonymous information about its visitors, which is made available by browsers and web servers, such as browser type, language preferences, site of origin, pages visited, duration of visit(s), date and time of each request, search terms, among others. No information is collected intentionally that can be used to identify visitors to the site. The purpose of collecting this information is to understand how our users use the website, so that we can improve the quality and usefulness of the services we provide.*

*Notwithstanding the anonymous information collected and processed on our Web Analytics platform, technical information about your visit(s) may be collected by the technological infrastructure supporting the system. **COFIIM** does not share this information with third parties, subject to the legal requirements imposed by the current legislation (i.e., this information may be shared with the relevant public authorities in compliance with Portuguese and European legislation).*

### **Use of Cookies**

*When you use this website we store cookies (small files with information) on your device, which allow us to understand whether or not you want to contribute with anonymous information to our Web Analytics platform, and whether or not you are logged into the website, among others.*

*In our implementation, neither technical nor analytical cookies contain personal data and both are transferred securely. Third party cookies are not managed by our system and may therefore be subject to their own cookies and privacy policies, outside the scope of applicability of the **COFIIM** policy. Please note that our system does not transfer personal data intentionally under any circumstances to external services.*

*Cookies can be blocked and/or disabled using your browser's settings or add-ons. Please check your browser's documentation for more information.*

*Updated on 26/03/2021*