

PRIVACY POLICY

Effective as of July 5, 2024.

At **MOD**, we care deeply about the protection of your personal data and we are determined to respect your privacy.

In this Privacy Policy, we describe how we collect and process personal data of all those who access and browse our website and contact us.

1. LEGAL FRAMEWORK

Your personal data shall be processed in a way to ensure compliance with the applicable legislation, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 or General Data Protection Regulation ("GDPR") and Law no. 58/2019 of 8 August, which ensures the execution of the GDPR in the Portuguese legal system.

2. DATA CONTROLLER

MOD, LDA. ("MOD"), with registered office at Rua Luz de Almeida, 1 A, São Domingos de Benfica, 1500 - 473 Lisboa, registered with the sole register and company number 516140990 and capital of €5.000,00 (five thousand euros), is the entity responsible for the processing of your data.

Throughout this Policy, references to "we" or "us" shall mean **MOD**.

If you have any questions about this Privacy Policy, or about how we treat your data, please refer to the "**CONTACT US**" section below.

3. WHICH TYPE OF DATA DO WE COLLECT?

Personal data are any information, of any nature and regardless of its medium, relating to an identified or identifiable natural person. Pursuant to the GDPR, an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We only collect the data we consider to be essential for you to browse our website, to provide you with information on your queries and to analyse and respond to your applications to our job offers.

To consult the purposes and legal basis for processing your data, please refer to the Section "**WHY WE PROCESS YOUR DATA AND FOR WHICH PURPOSES**" (below).

We may process, for example, the following categories and types of personal data:

Identification data: name, tax identification number, date of birth.

Contact details: e-mail address, telephone number, address.

CV Data: Education background, professional experience, skills, certifications

Connection and location data: IP address, type of device and country from which you access our website, pages visited, time spent on the website, navigation paths.

Communication Data: any data included in the messages or inquiries sent via contact form or e-mail.

Cookie Data: Information collected through cookies and other similar tracking technologies as detailed in our Cookies Policy.

4. USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies to track activity on our website and hold certain information. For detailed information on the cookies we use, the purposes for which we use them, and how you can manage your cookie preferences, please refer to our Cookies Policy.

5. WHY WE PROCESS YOUR DATA AND FOR WHICH PURPOSES?

MOD will process your personal data on the following legal basis:

- Compliance with contractual obligations or pre-contractual endeavours;
- Compliance with applicable legal obligations;
- For certain processing we will require your consent;
- Legitimate interests, insofar as the necessity of the processing of personal data is balanced with your interests or fundamental rights and freedoms.

We use the data we collect from you to provide you with the best possible experience. In particular, we collect and process personal data for:

- Communications and requests for information;
- Service proposals;
- Communication of offers, new services or products, and other advertising and marketing communications (e.g. sending our newsletters).
- Ensuring full functioning of our website.
- Recruitment purposes;
- Analyzing website usage and improving our services through cookies and similar tracking technologies.

The following table identifies some of the purposes for which we collect and process your personal data:

Purpose	Categories of data	Legal basis
Respond to communications you sent to us	Identification data, contact data, communication data	Performance of pre-contractual or contractual obligations with the customer you represent. Legitimate interests of the controller

Management of our relationship with the client you represent (e.g. contacts, sending proposals)	Identification data, contact data	Performance of a contract with the customer you represent. Compliance with legal obligations. Legitimate interests of the controller (for example, to understand how we can offer better services and products to our customers).
Ensuring full functioning of our website	Identification data, contact data, connection and location data, cookie data	Legitimate interests of the controller (for example, to keep our online services fully functional and secure)
Sending newsletters and other marketing communications	Identification and contact data.	Legitimate interests of the controller. Consent of the data subject.
Recruitment	Identification and contact data. CV Data	Consent of the data subject. Legitimate interests of the controller.

6. WHOM DO WE SHARE YOUR DATA WITH?

In the context of the rendering of our services or products, we may use service providers and intermediaries, such as companies that provide technological support, which must have access to some of your personal data.

However, these communications are made solely and exclusively for the fulfilment of the purposes for which the data are collected and in accordance with our instructions, in strict compliance with the regulations on the processing of personal data and information security. In any case, we will share all information regarding such communications with you.

We may also communicate your personal data to third parties where:

- you have expressly consented to it; or
- the communication is made in order to comply with a legal obligation or a court order.

We will only transfer your personal data outside the European Union or the European Economic Area, i.e. to a third country, ensuring strict compliance with European legislation on the transfer of data to third countries and will provide all necessary information, including, for example, an indication of the safeguards for such transfer:

- **Adequacy decisions:** where the European Commission determines that a third country offers an adequate level of data protection, personal data may be sent to that country without implementing any other measures mentioned above;
- **Standard contractual clauses:** we use standard contractual clauses for the transfer of personal data to organisations outside the EEA. These contractual commitments have been adopted by the European Commission and ensure adequate protection of personal data transferred to countries outside the EEA by binding recipients of personal

data to certain data protection standards, including the obligation to implement appropriate technical and security measures.

7. FOR HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

Your personal data will only be kept for the period necessary for the purposes for which they were collected or for the periods of time required by law.

8. WHAT ARE YOUR RIGHTS?

We make every effort to ensure that your personal information is accurate, up-to-date and complete in accordance with the purposes for which we use that information.

According to the GDPR, you have the right, at any time, to access and object to the processing of your personal information, as well as the right to update, correct and delete data collected by us that is incomplete, incorrect, out of date, or prohibited by law. You may exercise these rights by contacting us using the contact details provided below ("**CONTACTS**").

We explain your rights briefly below:

- **Right to be informed**

You have the right to obtain clear, transparent and easily understandable information about how we use your personal data.

- **Data subject's right of access**

You can request a copy of the data we hold about you.

- **Right of rectification**

You have the right to rectify your personal data if it is incorrect or out of date and/or to complete it if it is incomplete.

- **Right to erasure of data ("right to be forgotten")**

This right is not absolute, as we may have legal or legitimate reasons to retain your personal data.

- **Right to, at any time, object to the processing of data on the basis of consent**

You may object to the processing of data where such processing is based on consent. Withdrawing consent does not affect the lawfulness of the consent previously given.

- **Right to data portability**

You have the right to receive personal data concerning you, in a structured, commonly used and machine-readable format, and the right to transmit this data to another organisation. This applies only to data you have provided whose processing is based on your consent or on a contract, and if the processing is carried out by automated means.

- **Right to limit processing**

You can ask us to limit the use of your data to storage only, to stop using it for all other purposes or to retain data that should be deleted.

- **Lodging a complaint to the CNPD**

You also have the right to lodge a complaint with the data protection supervisory authority in Portugal when your rights have been violated or your personal information is or is being used in a way that you believe is not in accordance with applicable law. The contact details of the Portuguese Data Protection Commission are available [here](#), along with details on how to make a complaint.

9. HOW CAN YOU EXERCISE YOUR RIGHTS?

You can exercise any of these rights by using the contact details provided below ("**CONTACTS**").

10. AUTOMATED INDIVIDUAL DECISIONS

We do not anticipate that any decisions which have legal or other effects on you will be made using purely automated means; however, we will update this policy if this situation changes and notify you of such changes.

11. HOW DO WE RESPECT THE SECURITY OF SHARED INFORMATION?

We implement the technical and organisational measures that ensure the confidentiality of your personal data, protecting it from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access and against other unlawful forms of data processing.

For example, we take the following measures:

- The ability to ensure the ongoing confidentiality, integrity, availability and resilience of the processing systems and services;
- The ability to detect a personal data breach, resolve it and report it;
- The ability to restore availability and access to personal data in a timely manner in the event of a physical or technical incident;
- A process to regularly test, assess and evaluate the effectiveness of technical and organisational measures to ensure security of processing;
- Identification, disclosure and documentation of the roles and duties of personnel with access to personal data;
- Maintenance of a written record of all processing activities carried out, as per GDPR requirements;
- Definition and implementation of a written incident log procedure;
- Appointment of a security officer or, where appropriate, a Data Protection Officer, who shall be appointed where required by law;
- Definition and implementation of physical access controls;
- Implementation of security policies and procedures;
- Definition and implementation of a procedure for the destruction of personal data and documents, in a secure and confidential way.

Any entity we outsource to will be bound by equivalent security measures, acting at all times under our duly documented instructions.

12. HOW TO BE INFORMED ABOUT POSSIBLE CHANGES IN OUR PRIVACY POLICY?

As practices regarding the processing of personal data may change from time to time, this Privacy Policy will need to be updated accordingly and on a regular basis, so we advise you to check it periodically.

13. CONTACTS

If you have any questions about this Privacy Policy or want to exercise your rights to access, update or correct any personal information, please contact us through the following contacts:

Address: Rua Luz de Almeida, 1 A, São Domingos de Benfica, 1500 - 473 Lisboa

E-mail: solutions@mindoverdata.eu