

Privacy and Protection of Personal Data Policy of ACTUARIAL Group

Clause 1 (Scope)

The Privacy and Protection of Personal Data Policy, supplementary to the Terms and Conditions of the Website Use, is intended to regulate the processing of data to be realized by ACTUARIAL Group on account of the use of its website.

Clause 2 (Responsible for Processing)

The entity responsible for processing the data will be Actuarial – Consultoria, Lda, commercial shareholding society by limited responsibility based in Street Viriato, 25, 5º 1050-234 Lisbon, county of Lisbon, district of Lisbon, with a capital stock of € 5.000.00,00 (five thousand euros), registered at the Registry of Companies of Lisbon, with the registration number 1841/19900521 and VAT number NIPC 502352833.

Clause 3 (Data Collected)

ACTUARIAL Group will collect:

- Data provided directly by the holder;
- Data provided directly by the holder;
- Personal data requested from the holder and processed with his/her consent.

Clause 4 (Object)

The processing of data includes, namely, the recording, collection, consultation, use, adaptation, modification, storage, destruction of data, among other operations.

Clause 5 (Purposes)

The collected data is used for the following purposes, namely:

- The provision of the services requested by the holder or regarding which he/she will become participant;
- The provision of information on products, services, marketing activities, campaigns, promotions, statistical purposes and personalized content, with the prior consent to that effect.

Clause 6 (Legislation)

ACTUARIAL Group guarantees the processing of personal data in accordance with the legislation in force.

Clause 7 (Unprocessed Data)

ACTUARIAL Group shall not process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for identifying a person unequivocally, health data or data relating to the sexual life or sexual orientation of the holder.

Clause 8 (Registration)

By accessing or using our services of ACTUARIAL Group and in the act of registration in any area of its website , the user agrees with the privacy and protection of personal data policy of ACTUARIAL Group, giving his/her consent to the collection and processing of his/her data for the purposes referred to in clause 5, providing it directly. The failure to provide or the partial provision of the personal data by the holder may limit or render impossible the performance of the services.

Clause 9 (Collection)

Personal data may only be collected if:

- The user registers on the website;
- The data holder requests a service, responds to an inquiry, form and/or chatbot or exchanges electronic correspondence with ACTUARIAL Group.

Clause 10
(Consent to Receive Information)

The data holder shall give his or her prior consent in relation to the receipt of commercial communications for marketing purposes, and shall be entitled to oppose it at any time by means of a written communication addressed to ACTUARIAL Group.

Such commercial information may be sent by ACTUARIAL Group via email, telephone, SMS or any other electronic means of communication, social networking websites, Web 2.0, and any mobile phone content or method.

Clause 11
(Transmission)

In addition to the obligations referred to in the legislation governing data protection or the safeguarding and protection of its own interests, as a rule, ACTUARIAL Group shall not share any personal data with third parties without previous consent at any moment, unless sharing the data is mandatory to provide a product or service.

Clause 12
(Technical and Organizational Measures)

ACTUARIAL Group has appropriate technical and organizational measures for the protection of the data processed, namely, against unauthorized access or any other form of illegal or illicit processing.

ACTUARIAL Group guarantees, in addition to the measures safeguarding the security and internal protection of its facilities, the limitation of the access to personal data solely to its employees in order to fulfill the purposes of the processing.

Clause 13
(Access, Alteration and Forgetfulness)

The data holder is entitled to access and rectify the data processed and may at any time withdraw consent for the processing and request the erasure of the data, by means of a written communication addressed to ACTUARIAL Group.

Clause 14
(Duration of the Retention of Data)

ACTUARIAL Group will use reasonable efforts to ensure that it retains data on the data holder only for the time required for the purpose for which it was collected or as

required under any contract or applicable legislation, with a maximum period of 5 (five) years.

Clause 15 (Applicability)

The privacy and protection of personal data policies of ACTUARIAL Group apply to the processing of personal data carried out in the scope of its commercial activities and its provision of services, in accordance with the principles of lawfulness, loyalty and transparency.

Clause 16 (Cookies)

ACTUARIAL Group may use cookies on this website to improve the quality of service, features provided, and user experience, not being used for profiling.

If the use of cookies is not allowed, some of the website features may not match the expected level of service.

If you want to remove cookies, consult the Help section of your internet browser (to learn more about cookies: <https://support.microsoft.com/en-us/help/260971/description-of-cookies>).

Clause 17 (Automated Decisions)

ACTUARIAL Group will not make any commercial decision based on automated decisions, nor will it take any action leading to profiling.

Clause 18 (Control Authority)

The control authority is the Comissão Nacional de Proteção de Dados (National Data Protection Commission) (CNPD), with registered office at Rua de Sao Bento no. 148-3 1200-821 Lisbon.

Clause 19 (Communications)

Any communications concerning the processing of personal data should be addressed to ACTUARIAL Group via the e-mail: info@actuarial.pt.

Clause 20 (Changes)

ACTUARIAL Group reserves the right to modify this Privacy and Protection of Personal Data Policy at any time.