



**ACTUARIAL Group's
Privacy and Personal Data Protection Policy
|
Website Users**

(January 20, 2021)

Av. Duque d'Ávila, 185, 3º A e B
1050-082 Lisboa, Portugal

Dubai International Financial Centre,
Emirates Financial Towers, Office N304
PO Box 23325, Dubai, UAE

Tel 351 21 352 47 19; info@actuarial.pt; www.actuarial.pt

Tel 971 4 351 6708; info@actuarial.pt, www.actuarial.ae



Clause 1 (Scope)

The present Privacy and Personal Data Protection Policy, supplementary to the Terms and Conditions of the Website Use, is intended to regulate the treatment/processing of data to be performed by ACTUARIAL Group, acting as Controller, on account of the use of its website in the context of its Commercial or Recruitment Activities.

Clause 2 (Treatment/Processing's Responsible)

The entity responsible for the treatment/processing will be ACTUARIAL Group (Actuarial-Consultadoria, Lda, legal person no. 502352833, registered with the number 1841/19900521 along the Lisbon Commercial Registry Office, with headquarters based at Av. Duque de Ávila, 185, 3º A and B 1050-082 Lisbon, Portugal or ACTUARIAL LTD, a private company registered along the DIFC Registrar of Companies with Commercial License number CL 1633, with headquarters based at Dubai International Financial Centre, Emirates Financial Towers, North Tower, Office N304, PO BOX 23325 Dubai, United Arab Emirates, respectively for data treated/processed in Portugal and Dubai).

The entity responsible for the treatment/processing designates as responsible for:

- Permanent and exhaustive identification of data collected and treated/processed in relation to the various areas of activity of the company, Maria João Vaz, Head of Head of Compliance, Legal Affairs and Training, appointed also as Data Protection Officer;
- Implementation and maintenance of technical and organizational measures adequate to the protection of the data treated/processed, Carlos Baptista, Head of Software and Back Office Management.

Clause 3 (Object)

The treatment/processing of personal data entrusted to ACTUARIAL Group by its Website Users, includes any operation or set of operations performed upon personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage and archiving, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, transfer or otherwise making available, alignment or combination, restricting (meaning the marking of stored personal data with the aim of limiting treatment/processing of it in the future), erasure or destruction.



Clause 4 (Collection)

ACTUARIAL Group will collect and treat/process, under the principles of the present Privacy and Personal Data Protection Policy, the personal data provided by the respective data subject in any area of its website, namely to:

- Access the Reserved Area;
- Obtain additional information about products and / or services, send suggestions or request for information about ACTUARIAL Group's products and / or services;
- Training registration(s);
- Job application(s).

By providing any personal data for any of the purposes mentioned, the Website Users agree with ACTUARIAL Group's Privacy and Personal Data Protection Policy, giving his/hers consent to the collection and treatment/processing of his/hers personal data, which he/she provides directly and which non-supply or partial supply may limit or prevent the performance of the intended, for that purpose.

Clause 5 (Purpose of the Collected Data)

The collected data are intended to be used for advertising, marketing and public relations for the Controller itself, regarding:

- The development of ACTUARIAL Group's Commercial Activity;
- With the data subject's prior consent, the disclosure of products, services and news about the company as well as the performance of satisfaction and / or assessment surveys;
- Recruitment processes (if collected within job applications).

The use of personal data entrusted to ACTUARIAL Group by its Website Users for purposes other than those mentioned must be based on the data subject's consent, that must be given in a specific, informed, free and unequivocal manner, through which, by declaration or positive act, the data subject expressly grants his/hers agreement to the treatment/processing of his/hers data for these other specific purposes.

The data collected can also, if applicable, be used to fulfill ACTUARIAL Group's legally binding information procedures.



Usually, the personal data collection is limited to the name, address, telephone / mobile number and email address, but other data such as, but not limited to, academic background and employment and career history, necessary to provide products or services, may also be collected.

In addition to the personal data indicated in the previous paragraph, in the context of job applications also possible through ACTUARIAL Group's website, other information contained in a curriculum Vitae (CV) such as, but not limited to, age, date of birth, gender, place of birth and nationality, picture, National ID card and Passport details (number and the date of issuance and validity) and copy, Social Security or other national identifiers details (number and the date of issuance and validity) and copy, work permit (foreign employees), marital status, academic background and memberships, employment and career history, benefits information, information provided by references and information regarding career interests and other qualifications information for employment, may also be collected (information, such as, but not limited to, data revealing racial or ethnic origin, religion, family composition and personal information, driver's license details, leisure time activities and interests, that may be included in a curriculum vitae sent by a job applicant, will never be extracted from that document).

ACTUARIAL Group will maintain a written record of all categories of treatment/processing activities carried out based on the use of personal data entrusted to it by its Website Users, within the scope of the use of its website (Annex).

Clause 6 (Unprocessed Data)

ACTUARIAL Group will not treat/process personal data that reveal racial or ethnic origin, communal origin, political affiliations or opinions, religious or philosophical beliefs, criminal record, trade-union membership of the data subject, nor will it proceed with the treatment/processing of genetic data and biometric data that allow the identification of a person unequivocally, as well as of health-related data or data relating to the data subject's life or sexual orientation, in a manner likely to pose a high risk to the rights and freedoms of natural persons.

Clause 7 (Law)

ACTUARIAL Group guarantees the treatment/processing of personal data entrusted to it by its Website Users in accordance with the law in force regarding its collection, treatment/processing, use, disclosure, storage, and privacy.

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Clause 8 (Personal Data Sharing)

In addition to the obligations referred to in the Law governing data protection or the safeguarding and protection of its own interests, ACTUARIAL Group will not share any personal data entrusted to it by its Website Users with third parties¹.

Clause 9 (Automated Decisions)

ACTUARIAL Group will not make any decision based on automated treatment/processing, nor will it take any action leading to profiling.

Clause 10 (Data Subjects' Rights)

The data subject is granted the right to withdraw his/hers consent for the treatment/processing of his/hers personal data, as well as the right of access, rectification and erasure of the personal data treated/processed regarding him/her, being also entitled to object or restrict the treatment/processing of his/hers personal data and to ask for his personal data portability.

Any of the mentioned rights of the data subject can be exercised by means of a written communication addressed to ACTUARIAL Group by post (to the company's physical address) or email (dpo@actuarial.pt).

Clause 11 (Cookies)

To improve the quality of service, the provided features and the user experience, ACTUARIAL Group's website may use cookies, which, under no circumstances, will be used for profiling.

If the use of cookies that may eventually be used will not be allowed, some of ACTUARIAL Group's website features may not match to the expected level of service.

¹ Public authorities, which might address the Controller any request for the disclosure and transfer of any personal data over a data subject or any part of its group, are not considered third parties.



For cookies removal, please, 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 12 (Technical and Organizational Measures)

ACTUARIAL Group has adequate technical and organizational measures to protect the treated/processed data, namely, against:

- Unauthorized access;
- Any other form of illegal or unlawful treatment/processing;
- Their loss, destruction, or damage.

ACTUARIAL Group stores the personal data entrusted to it by its Website Users and which it treats/processes, on its servers located on its premises in Lisbon and protected and maintained according to the best practices, policies and security procedures, namely through data compartmentation, protection against malicious access and viruses through antivirus and firewall, authorized users access control and backup and redundancy procedures.

In addition to the security measures and internal protection of its facilities and the equipment where it stores the personal data entrusted to it by its Website Users, ACTUARIAL Group guarantees the limitation of access to such data only to its Employees whose function is to fulfill the purposes of treatment/processing related to those data, maintaining a control of accesses to the same, which allows it to track who accessed them, when and for what purpose.

Clause 13 (Data Maintenance)

ACTUARIAL Group will make reasonable efforts to ensure that it retains the personal data entrusted to it by its Website Users and which it treats/processes, only for as long as necessary for the purpose for which they were collected or until treatment/processing is required to cease due to the exercise of any of the data subject's rights and, after that, it will be responsible for their archive in a manner that ensures the data are put beyond further use, keeping them for a period of 10 (ten) years, after which they are securely and permanently deleted, only for the need of fulfillment of its legally binding information procedures.

Clause 14 (Security Breach)

ACTUARIAL Group must notify the competent supervisory authority², in writing, of any breach of security of which it becomes aware and which causes the destruction, loss, alteration, disclosure or unauthorized access to the personal data entrusted to it by its Website Users and with which it deals.

The aforementioned notification will contain at least:

- A description of the nature of the personal data breach;
- The name and contact details of the Data Protection Officer;
- A description of the likely consequences of the personal data breach;
- Description of the measures taken or proposed to repair and / or mitigate the breach of personal data.

The referred notification, must be made as soon as possible, without undue delay and, if it is not possible to provide all the information referred to in the previous paragraph simultaneously, the information can be provided in phases, when available.

When a personal data breach is likely to result in a high risk to the security or rights of a data subject or if there is an immediate risk of damage to the data subject, ACTUARIAL Group shall also communicate the personal data breach to an affected data subject(s) (Website User(s)), respectively, as soon as practicable or promptly, and, in addition to the information that has been listed above it shall, where possible, make recommendations for the affected data subject(s) to mitigate potential adverse effects.

Clause 15 (Applicability)

The present Privacy and Personal Data Protection Policy applies to the treatment/processing of personal data entrusted to ACTUARIAL Group by its Website Users and carried out in the context of its Commercial or Recruitment Activities in accordance with the principles of lawfulness, loyalty and transparency.

² In Portugal, the Comissão Nacional de Proteção de Dados (CNPd, the National Commission of Data Protection) and in the United Arab Emirates, the Dubai International Financial Centre's Commissioner of Data Protection.



Clause 16 (Supervisory Authority)

The supervisory authority is;

- Regarding the personal data treated in Portugal, until other definition by Law, the Comissão Nacional de Proteção de Dados (CNPD), headquartered at Av. D. Carlos I, 134, 1º 1200-651 Lisboa;
- Regarding the personal data processed in the United Arab Emirates, the Commissioner of Data Protection, headquartered at Dubai International Financial Service Authority, Level 14, The Gate, PO Box 74777, Dubai, United Arab Emirates.

Clause 17 (Amendments)

ACTUARIAL Group reserves the right to change its Privacy and Personal Data Protection Policy at any time.



Contact Us

If you have any questions, comments and requests related to the present Policy, or if you have any complaints related to how ACTUARIAL Group treats/processes your personal data, please contact the Company's Data Protection Officer:

Maria João Vaz

mjoao.vaz@actuarial.pt

- Av. Duque d'Ávila, 185, 3º A e B
1050-082 Lisbon, Portugal

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ANNEX

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**Record of Treatment/Processing Activities
under the
Privacy and Personal Data Protection Policy | Website Users**

Controller and Its Appointed Data Protection Officer

- Controller:

ACTUARIAL Group

info@actuarial.pt

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- Controller's Data Protection Officer:

Maria João Vaz

mjoao.vaz@actuarial.pt

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Purpose of Treatment/Processing

The collected data are intended to be used for advertising, marketing and public relations for the Controller itself, regarding:

- The development of ACTUARIAL Group's Commercial Activity;
- With the data subject's prior consent, the disclosure of products, services and news about the company as well as the performance of satisfaction and / or assessment surveys;
- Recruitment processes (if collected within job applications).

The treatment/processing is necessary for:

- Performance of a contract to which a data subject is a party and/or
- Compliance with Applicable Law that the Controller is subject to

The treatment/processing for specific purposes not mentioned in the present Privacy and Personal Data Protection Policy must be grounded on the data subject's consent, which can be withdrawn at any time.

Categories of Data Subjects

ACTUARIAL Group's Website Users.

Categories of Personal Data Treated/Processed

Taking into account what is mentioned in the present Privacy and Personal Data Protection Policy regarding **Untreated/Unprocessed Data**, usually, the personal data collected are limited to name, address, telephone / mobile phone number and email address (if necessary to provide products or services, other data might be collected) as well as, in the context of job applications also possible through ACTUARIAL Group's website, other information contained in a curriculum Vitae (CV) such as, but not limited to, age, date of birth, gender, place of birth and nationality, picture, National ID card and Passport details (number and the date of issuance and validity) and copy, Social Security or other national identifiers details (number and the date of issuance and validity) and

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copy, work permit (foreign employees), marital status, academic background and memberships, employment and career history, benefits information, information provided by references and information regarding career interests and other qualifications information for employment.

Recipients of the Disclosed Personal Data

Management and Employees of the Controller in Portugal or in the United Arab Emirates, respectively under the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016) and the Data Protection Law 2020 (DIFC Law (5) of 2020), that present unique sets of rules regarding the protection of natural persons in what concerns the treatment/processing of personal data and the free movement of such data, which govern the treatment/processing of personal data developed by ACTUARIAL Group, in both those countries³.

Personal Data Erasure

After the treatment/processing of the personal data for the purpose for which they were collected or the exercise of a data subject's rights regarding the treatment/processing cessation, ACTUARIAL Group will keep the personal data it treats/processes for a period of 10 (ten) years, after which they are securely and permanently deleted.

Technical and Organizational Measures

ACTUARIAL Group:

- Stores the personal data it treats/processes, on its servers located on its premises in Lisbon and protected and maintained according to the best practices, policies and security procedures, namely through data compartmentation, protection against malicious access and viruses through antivirus and firewall, authorized users access control and backup and redundancy procedures;
- Guarantees the limitation of access to such data only to its Employees whose function is to fulfill the purposes of treatment/processing related to those data,

³ Portugal is considered as a country with an adequate data protection regime under the Data Protection Law 2020 governing ACTUARIAL Group's processing of personal data (Article 26(2) of the DIFC Law (5) of 2020 and Appendix 3 of the Data Protection Regulations) in the United Arab Emirates.



maintaining a control of accesses to the same, which allows it to track who accessed them, when and for what purpose.

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