

Personal Data Protection Policy

The Company CONCEITO, SA is willing to protect and respect the privacy of personal information, ensure the confidentiality and integrity of the information, in compliance with the Regulation Affecting the Protection of Personal Data (RGPD) and with the in force Portuguese law regarding personal databases Law 58/2019.

Under the current legislation, the Company CONCEITO, SA takes up the responsibility for dealing with their staff members personal data, visitors and suppliers; and takes over the role of being a sponsor for their clients, as for the services contracted, they have access to the personal data of their clients' staff. The clients are solely responsible for the collection and management of data pertaining to their coworkers which are provided to **CONCEITO, SA**.

CONCEITO, SA process the data relating to personal information as follow (purposes and requirements):

Category of Right Holders	Legal Basis	Purposes	Recipients of the Data
Visitors	Permission Legitimate Interest	Information Security	In answer to Official Entities' and Insurance Companies' Emergencies Information Facilities
Work Candidates	Permission	Information and Communication	Recruitment Agency Information Facilities
Clients	Service Agreement Specific Consent Legal Obligations	Accountant Services, Payroll, among others	Official Entities Auditors and Inspectors Information Facilities
Staff Members	Service Agreement Legal Obligations	Mission Implementation, Organizational Objectives and Legal Obligations	Official Entities Auditors, Inspectors and Prosecutors Bank Entities, Insurance Companies and Labor Medicine Information Facilities
Suppliers	Service Agreement Legal Obligations	Communication Related to Services Provided	Official Entities Auditors and Inspectors Information Facilities

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In order to implement the different purposes, **CONCEITO, SA** may process distinctive types of personal data:

- identification (such as name, birth date, card number identification);
- contact (such as mobile number, address or e-mail);
- qualification and professional situation (such as education level, work performance);
- bank, financial and transactions data (such as IBAN, tax payer number);
- specific/special data (health, criminal offences);
- biometric access to the facilities;
- images collect from video surveillance systems;
- images of recording events.

According with the withholding policy of **CONCEITO, SA**, the personal data will be destroyed as soon as their purposes and requests means ends, that is, within a period considered suitable and/or necessary in order to fulfill the objectives that motivated the collection of the data, in conformity with the applicable laws.

Periodically, **CONCEITO, SA**, performs the evaluation concerning the risks of breach in privacy policies of their holders and have established a system of managing privacy data and security information composed by several organizational and technical measures considered to be suitable and at reach of the company in order to avoid the breakage of confidentiality principles, integrity and the availability of the personal data under their care and which provides a reliable handling of the information.

When the handling of the data is done by third parties chosen by **CONCEITO, SA**, is establish between the parties an agreement regarding the specifications of the RGPD, in order to obtain the necessary guarantees that the handling of data complies with the demanded requirements and ensures the rights of the holders.

As the holder of personal data, you have the following rights:

1. The right to obtain confirmation that the data related to you is being handing properly, and if this may be the case, to access to your personal data and information as foreseen by the law;
2. The right to have your data rectified without no due delate, by **CONCEITO, SA**, if the information is inaccurate or incomplete;
3. The right to request for the deletion of your personal data, without no further delays, when the purpose that originated the collection and data processing is no longer necessary;

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4. The right to restrict in certain cases the processing of your data, namely if the handling of the information is being done unlawfully or if there is an opposition towards the request for your data's deletion, by proposing in return the use of your data with limitations;
5. The right to have portability rights of their own personal data that was provided to **CONCEITO, SA** in a structured format, of current use, of automatic reading, and which also includes, the right to deliver these data to other person responsible for its processing;
6. If the information handling requires your consent, you have the right to withdraw it;
7. You have the right to submit a claim to the Personnel/Department in Charge of the Data Protection (DPD) through compliance@conceito.pt and/or to the *CNPD Autoridade de Controlo Portuguesa*.

To ensure that your rights are pursued, you must submit a request in writing through compliance@conceito.pt. For your safety and whenever considered necessary, the company **CONCEITO, SA** shall request additional information in order to confirm your identity. The person in charge of the processing will be the one responsible to deliver an answer as soon as possible.

The company, **CONCEITO, SA** reserves the right to review from time to time the current policy, therefore we recommend that you consult regularly the Privacy Policy available on its website.

Direction

Vanessa José

CONCEITO, SA

January 6th 2020