

I. INTRODUCTION

a) Thank you for consulting our Privacy Policy, we are at your disposal to provide any clarifications and information about the way we process your personal data.

b) Grupo Nelson Quintas absolutely respects your privacy and the personal data whose processing you entrust to us, and we consider this respect to be essential and one that is foundational of our activity as a responsible organization.

c) We comply with and enforce the currently binding personal data protection legislation, namely the General Data Protection Regulation (Regulation (EU) 2016/679), hereinafter GDPR, and law 58/2019 of August 8, which executes the GDPR in the Portuguese legal order.

d) We are fully committed to protecting your privacy and personal data and, at the same time, provide you with the best experience using our website, which we designed and created for you.

II. CONTROLLER OF YOUR PERSONAL DATA

Nelson Quintas Imobiliária S.A., with the taxpayer nº. 501488855, registered office at Rua do Campo Alegre, 830 – 9º Andar, 4150-171 Porto, is the controller of your personal data, within the meaning of article 4, point 7) of the General Data Protection Regulation.

III. HOW WE ACT?

1- This policy reflects the way we act when we provide our services and whenever, in any way, we interact with you and process your personal data.

2- The processing of personal information is carried out only by those who are duly authorized by us, and by no one else.

3- Our concern with your personal data is established by design and by default, in our website and in everything we do, in the way we provide our services, how we act within the scope of our relationship with you and our partners, and in all initiatives that we may

develop. Your data is processed on a strictly necessary basis and with strict control over its access.

4- We search, evaluate, and implement the most appropriate solutions to protect your personal information, and we do it with the purpose to continuously improve the services we provide.

5- We assume that the protection of your personal data begins with the rigor and qualitative level of the information we provide, always seeking to improve its content and ensuring that it is clear, accessible, and understood by everyone.

6- We act with the belief that transparency and information must be the basis of everything we do and that they constitute the pillar of trust that unites us with our clients and what sustains long lasting relationships.

7- All of us at Grupo Nelson Quintas have received training and know that your personal data belongs to you, as the data subject.

IV. WHAT YOU SHOULD KNOW

1- Accessing our website and making your personal data available implies and assumes that you are aware of the content of this policy.

2- We advise you to carefully read our Terms and Conditions, as well as our Cookies Policy, documents that you will find at the bottom of our website's homepage.

3- Regarding the content that we provide, note that there might exist links to external websites that we do not control, which are the responsibility of the company who owns those pages, for which we do not assume, nor can we assume, any responsibility for the content, level and accuracy of your information, compliance with applicable law or the way they operate.

V. PERSONAL DATA PROTECTION CONCEPTS

1- These are some of the concepts inherent to the protection of personal data:

What is “Personal Data”? Any information relating to an identified or identifiable natural person, where an identifiable natural person is considered to be a natural person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more specific elements of their physical, physiological, psychological, economic, cultural or social identity.

What is meant by “Processing”? This regards an operation or set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, registration, organization, structuring, conservation, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, broadcast or any other form of availability, comparison or interconnection, limitation, erasure or destruction.

Who is the “Controller”? The natural or legal person, public authority, agency or other body which, individually or jointly with others, determines the purposes and means of processing personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria applicable to its nomination may be provided for by Union or Member State law.

What is “Consent”? Consent is given by you, as the data subject and when legally applicable, translating a free, specific, informed and unequivocal expression of will, by which you accept, through a declaration or unequivocal positive act, that the personal data concerning you will be subject to treatment.

What is a “Personal Data Breach”? It means a breach of security that causes, accidentally or unlawfully, the unauthorized destruction, loss, alteration, disclosure, or access to personal data transmitted, stored or subject to any other type of processing.

VI. WHICH DATA DO WE PROCESS?

1- The personal data we process is limited to what is necessary for the purposes of our services, attentive to the legal principle of minimization legally provided for in the GDPR.

2- In this regard, we only process the personal data that is adequate, relevant, and limited to what is necessary for the purposes of our services.

VII. CATEGORIES AND TYPES OF DATA THAT WE PROCESS?

1- The categories and types of personal data that we process, for the purpose of providing our services, are as follows:

a) Your identification data:

- i) name;
- ii) date of birth;
- iii) citizen card data;
- iv) nationality.

b) Your contact details:

- i) address;
- ii) phone number;
- iii) email.

c) Your professional data:

- i) your position;
- ii) functions performed;
- iii) the company where you work;
- iv) academic data and professional experience, in the course of hiring (e.g. education, qualifications, certifications, languages, CV).

d) Your billing details:

- i) the tax identification number;
- ii) billing address.

e) Your image and sound data, for example, in the context of events organized by us:

- i) pictures;
- ii) video (with and without the voice of the holders).

2- Personal data is processed electronically and stored in databases.

3- In the event that we process special categories of personal data (“sensitive data”), such as health data, this will only occur based on the exceptions provided for in article 9, paragraph 2 of the GDPR.

VIII. PURPOSES OF PROCESSING PERSONAL DATA

a) **We identified the purposes of the processing of your personal data**, below, which are determined and legitimate, complying with the principle of purpose limitation:

- i) for the purpose of identifying you as our client;
- ii) to provide our services;
- iii) if you ask us for information, so that we can inform you;
- iv) for marketing purposes (only with your consent or in accordance with our legitimate interest, duly considered and justified);
- v) to inform you of changes to the conditions for providing the contracted services;
- vi) to optimize visits and navigability on our website;
- vii) for managing our contractual relationship and its execution;
- viii) to adapt the services, we provide to the needs of our customers;
- ix) for billing purposes;
- x) to comply with legal obligations;
- xi) for events and their advertisement;
- xii) for recruitment and selection processes.

IX. LEGAL BASIS FOR PROCESSING PERSONAL DATA

a) The processing of your personal data may be carried out:

- i) in order to take steps at the request of the data subject prior to entering into a contract or for the performance of a contract to which the data subject is party
- ii) compliance with legal obligations to which we are subject;
- iii) your consent, which we will ensure is freely given by you, specific, informed and unambiguous;
- iv) our legitimate interests, and we will ensure that they are not override your interests, rights and freedoms, otherwise we will not invoke them.

X. CONSERVATION OF PERSONAL DATA?

- a) **We follow the legal rule** that data must be kept only for the time necessary and for the purposes that motivated its processing, after which it will be deleted or anonymized;

- b) **Please be aware** that there are legal requirements that oblige us to retain data for a minimum period of time and, in these circumstances, we are obliged to respect these deadlines for as long as legally provided;

- c) **If the processing is based on your consent**, we will retain the data until you withdraw your consent or if the purpose we pursue no longer exists.

XI. DATA SUBJECT RIGHTS

1- As the data subject, you have the following rights:

a) **Right of access- (article 15 of the GDPR)**

You have the right to request from us, among others, information regarding whether or not your data is being processed, what data we process and for what purposes.

b) **Right to rectification- (Article 16 of the GDPR)**

Right to have, without undue delay, rectification of inaccurate personal data concerning you and for incomplete data to be completed.

c) **Right to erasure- (Article 17 of the GDPR)**

Also known as the right to be forgotten – you can request, in certain circumstances, that your personal data be erased from our records, without undue delay, whenever any of the reasons set out in the GDPR apply.

d) **Right to object- (Article 21 of the GDPR)**

You have the right to object, for reasons related to your particular situation, to certain types of data processing provided for in the GDPR, such as processing for direct marketing purposes, in which case we will cease processing for that purpose.

e) Right to restriction processing- (article 18 of the GDPR)

The right to obtain restriction of the processing of your personal data, when you wish, for example, to contest the accuracy of your personal data for a period of time that allows us to verify its accuracy, when the processing is unlawful or if you have deduced your right of opposition.

f) Right to data portability- (article 20 of the GDPR)

You have the right to transfer your personal data that we keep to another organization or to receive it in a structured, commonly used, and machine-readable format.

g) Right to withdraw consent- (Article 7(3) GDPR)

If consent is legally necessary for the processing of personal data, the data subject has the right to withdraw consent at any time, easily, although this right does not compromise the lawfulness of processing carried out based on previously given consent.

h) Right to lodge a complaint with a supervisory authority- (Article 77(1) GDPR)

In Portugal, the control authority is the CNPD- National Data Protection Commission (www.cnpd.pt).

i) Right to claim compensation and liability- (Article 82 GDPR)

If you have suffered material or non-pecuniary damage due to a violation of the GDPR, you have the right to receive compensation from the controller or processors for the damage suffered.

j) Right to mandate a non-profit body, organization, or association to, on your behalf, lodge a complaint- (Article 80 of the GDPR)

The data subject has the right to mandate a non-profit body, organization or association, which is duly constituted under the law of a Member State, whose statutory objectives are in the public interest and whose activity covers the defense of rights and freedoms of the data subject with regard to the protection of their personal data, to, on their behalf, lodge a complaint, exercise the rights provided for in Articles 77, 78 and 79 of the GDPR, and exercise the right to receive a compensation referred to in Article 82, if this is provided for in the law of the Member State.

k) Right not to be subject to automated decisions- (Article 22 of the GDPR)

You have the right not to be subject to any decision made exclusively based on automated processing, including profiling, that produces effects in your legal sphere or that significantly affects you in a similar way. This subjection, if it occurs, will only take place, on our part, within the scope of the exceptions provided for in article 22, n. º 2 of the GDPR, and we will apply measures that ensure the right to obtain human intervention, allowing you to express your opinion and contest the decision.

2. For the purpose of the exercise of these rights, please check the “Contacts” section below.

a) After sending your email, or by other means, in which you express that you intend to exercise the rights indicated in subparagraphs a), b), c), d), e), f), g), h), we will act accordingly, sending you the “Form for exercising data subject rights”.

XII. RESPONSE DEADLINES TO DATA SUBJECTS

1- The Data Protection Officer will respond to your requests regarding processing, in a quick and concise manner, as well as, in a transparent, intelligible, and in an easily accessible way, using clear and simple language.

2- The response will be provided under the terms established in the GDPR, within a period of 30 calendar days (which may increase to 60 days in case of complexity or depending on the number of requests).

3- The information is provided in writing or by other means, including, when applicable, by electronic means.

4- Upon your request, the information can be provided orally, as long as your identity is duly proven, otherwise, the absence of identification, the Data Protection Officer may refuse to provide you with a response.

XIII. SECURITY MEASURES

1- We have adopted appropriate technical and organizational measures to ensure a level of security that we believe is appropriate to the risk associated with the processing of your personal data, considering the measures provided for in article 32 of the GDPR.

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2- Aware of technological developments, which are permanent, we periodically review and improve the implemented measures, which guarantee increasingly better and more efficient security, ensuring that your data is protected based on the best possible technology, and considering the perceived risk.

3- We seek to ensure that the availability, authenticity, integrity, and confidentiality of your data are assured, as well as to prevent its loss, alteration, unauthorized disclosure or access or misuse of personal data, or any other form of unlawful processing that may take place.

4- We invest decisively and regularly in training our people, ensuring that they have the necessary legal and technical knowledge to process your personal information, following the applicable legal rules, the best-known practices, as well as complying with the internal procedures defined and implemented.

XIV. DATA PROCESSING UNDER THE PROCESSOR'S REGIME

1- As part of our activity, we may use processors who process your data on our behalf, as provided for in the GDPR.

2- Whenever this happens, we adopt the following procedure:

i) We carefully choose our processors, whom we previously evaluate, determining in advance whether they comply with the GDPR and other applicable legislation, and this evaluation takes place before any contract is in place;

ii) By doing so we verify whether or not they present sufficient and adequate guarantees for the execution of technical and organizational measures designed to protect your personal data and that they will act only in accordance with our documented instructions;

iii) We enter into a written contract with our processors, therefore complying with the legal requirements established in article 28 of the GDPR.

XV. DATA COMMUNICATION

1- Within the scope of the services we provide, data communication is a necessary requirement to enter into a contract or to send you communications.

2- The lack of such information naturally constitutes an obstacle to enter into a contract, that being the only resulting consequence.

XVI. INTERNATIONAL PERSONAL DATA TRANSFERS?

1- As a rule, your data will always be processed within the European Economic Area, and we choose, if necessary and preferably, providers that are located within this geography.

2- If we communicate personal data to third countries or international organizations, outside the European Economic Area, we will strictly comply with the applicable legal provisions, not carrying out international personal data transfers to entities that do not offer guarantees of maintaining the level of protection required by the GDPR.

XVII. ARE THERE COOKIES ON OUR WEBSITE?

We only use cookies that are essential or necessary for the functioning of the website, which do not require us to ask for your consent.

XVIII. HOW CAN YOU CONTACT US

Address: Rua do Campo Alegre, no. 830, 9th floor, 4150-171 Porto
Email: geral@nelsonquintas.pt
Telephone: 226 079 280

XIX. DATA PROTECTION OFFICER

1- Nelson Quintas Imobiliária SA appointed and communicated to the Portuguese data protection authority- CNPD – *Comissão Nacional de Proteção de Dados*, the name and contacts of its Data Protection Officer, who fulfills the tasks set out in article 39 of the GDPR.

2- The Data Protection Officer can be contacted as follows:

Address: Rua do Campo Alegre, no. 830, 9th floor, 4150-171 Porto

Email: privacidade@nelsonquintas.pt

XX. PRIVACY POLICY REVIEW

1-For various reasons, whether related to legal or technological issues, we may have to change, without prior notice, the content of this privacy policy.

2- If this occurs, we will indicate it on our website, so that you can consult it, leaving all users bound by the new terms whenever using the website.

XXI. APPROVAL OF THE PRIVACY POLICY

Our privacy policy was approved by the management body of Nelson Quintas Imobiliária S.A.

XXII. VERSION

Version 2.0- march 2024