PRIVACY POLICY

1. INTRODUCTION

This privacy policy describes how your personal data is processed and provides information about the services provided and the measures adopted to ensure its protection.

The Nelson Quintas Group and the companies within its group recognise privacy and the protection of personal data as essential principles that guide their activities.

Personal data is processed in accordance with applicable legislation, in particular Regulation (EU) 2016/679 of 27 April 2016 (the General Data Protection Regulation or 'GDPR') and Law No 58/2019 of 8 August, which ensures its implementation in the Portuguese legal order.

2. IDENTIFICATION OF THE DATA CONTROLLER

The data controller for your personal data is Nelson Quintas Imobiliária, S.A., with the single company registration and legal entity identification number 501 488 855, having its registered office at Rua do Campo Alegre, 830, 9th floor, 4150-171, Porto, within the meaning of Article 4(7) of the GDPR.

3. PROCESSING AND PROTECTION OF PERSONAL DATA

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

Access to the personal data you entrust to us is restricted according to the need for the relevant processing and the purposes pursued.

The protection of your personal data is ensured from conception and by default and is integrated into everything we do: the way we provide our services, our relationship with you and our partners, and all the initiatives we undertake. Personal data is processed only to the extent strictly necessary, and access to it is strictly controlled.

Protection of personal data is a priority, reflected in the provision of quality information regarding the relevant processing in a transparent, clear, accessible and understandable manner.

4. PERSONAL DATA PROTECTION CONCEPTS

For the purposes of this policy, the following concepts are relevant:

Personal data: any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to that person's physical, physiological, mental, economic, cultural or social identity.

Processing: an operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction.

Data controller: a natural or legal person, public authority, agency or other body which, individually or jointly with other entities, determines the purposes and means of the processing of personal data. Whenever the purposes and means of such processing are determined by Union or Member State law, the data controller or the specific criteria for its designation may be provided for by Union or Member State law.

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller for those data.

Supervisory authority: an independent public authority established by a Member State pursuant to Article 51 of the GDPR.

5. PURPOSES AND CONDITIONS OF PERSONAL DATA PROCESSING

The personal data we process is limited to that which is strictly necessary for the provision of our services, in accordance with the principle of data minimisation.

Depending on the purposes pursued, the following table identifies the personal data that may be processed and the corresponding applicable legal basis.

Purpose	Categories of personal data	Legal basis
Client identification	Identification and contact data	Pre-contractual steps or performance of the contract; compliance with a legal obligation, where applicable.
Provision of services	Identification, contact, professional and contractual data	Pre-contractual steps or performance of the contract; legitimate interests, where applicable.
Responding to requests for information	Identification and contact data	Pre-contractual steps, compliance with a legal obligation or legitimate interests, depending on the nature of the request.
Marketing	Identification, contact and preference data	Consent or legitimate interests, where legally permissible.
Communication of changes to services	Identification and contact data	Performance of the contract or compliance with a legal obligation.
Operation of the website	Electronic identification and browsing data	Consent or legitimate interests, where applicable.
Management of the contractual relationship	Identification, contact, professional, contractual and financial data	Performance of the contract or compliance with a legal obligation.
Invoicing	Identification, tax, invoicing and payment data	Performance of the contract or compliance with a legal obligation.
Recruitment and selection	Identification, contact, academic and professional data	Pre-contractual steps.
Organization and promotion of events	Identification, contact, image and voice data	Performance of the contract, consent or legitimate interests, as applicable.

6. RETENTION OF PERSONAL DATA

Your personal data is retained only for the period necessary to pursue the purposes for which it was processed, after which it is erased or anonymised.

Nevertheless, there are legal requirements that oblige us to retain data for a minimum period. In those circumstances, we will comply with the legally applicable periods.

Where processing is based on your consent, we will retain the data until you withdraw that consent or until the purpose no longer subsists, without prejudice to the applicable legal periods.

7. RIGHTS OF DATA SUBJECTS

Under applicable legislation, as a data subject you may exercise the following rights:

Right to withdraw consent (Article 7(3) of the GDPR)

The right to withdraw consent at any time, without affecting the lawfulness of processing previously carried out based on that consent.

Right of access (Article 15 of the GDPR)

The right to obtain confirmation as to whether your personal data is being processed and, if so, to access it and obtain information about its processing.

Right to rectification (Article 16 of the GDPR)

The right to obtain the rectification of your inaccurate personal data and to complete data that is incomplete.

Right to erasure (Article 17 of the GDPR)

The right to request the erasure of your personal data whenever any of the circumstances provided for in the GDPR apply.

Right to restriction of processing (Article 18 of the GDPR)

The right to obtain restriction of the processing of your personal data.

Right to data portability (Article 20 of the GDPR)

The right to receive your personal data in a structured, commonly used and machine-readable format and, where applicable, to transmit it to another data controller.

Right to object (Article 21 of the GDPR)

The right to object to the processing of your personal data.

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

The right not to be subject to a decision based solely on the automated processing of your personal data, including profiling, when that decision produces legal effects concerning you or similarly significantly affects you.

Right to lodge a complaint (Article 77 of the GDPR)

The right to lodge a complaint with a supervisory authority, namely, in Portugal, the National Data Protection Commission (CNPD).

Right to representation (Article 80 of the GDPR)

The right to mandate a not-for-profit body, organisation or association to exercise certain rights on your behalf, under the conditions provided for in the GDPR.

Right to compensation and liability (Article 82 of the GDPR)

The right to compensation for damage suffered as a result of an infringement of the GDPR.

To exercise these rights, please consult section "**15. Contact details**" or "**16. Data Protection Officer**".

After receiving your request, by email or by another appropriate means, we will analyse it and take the appropriate action.

8. RESPONSES TO DATA SUBJECTS' REQUESTS

Requests relating to the processing of personal data are reviewed promptly, and responses are provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

A response is provided within one month of receipt of the request. This period may be extended by two months where necessary, considering the complexity and number of requests, in accordance with the GDPR.

Information is provided in writing or by other means, including, when appropriate, by electronic means.

At the data subject's request, the information may be provided orally, provided that their identity is duly verified. If there is insufficient information to confirm the data subject's identity, the request may not be fulfilled.

9. SECURITY OF PERSONAL DATA

We have adopted appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of your personal data, considering the measures provided for in Article 32 of the GDPR.

In view of ongoing technological developments, we periodically review and improve the measures implemented in order to strengthen the security of personal data.

We promote the continuous training of our staff, ensuring that they have the knowledge necessary to process your personal data appropriately, in accordance with applicable legislation and best practices in data protection.

10. DATA PROCESSING BY PROCESSORS

During our activities, we may engage processors to process your personal data on our behalf, as provided for in the GDPR.

Whenever this happens, your personal data will be processed only in accordance with our documented instructions and under a written agreement that ensures compliance with the requirements set out in Article 28 of the GDPR.

In this context, we engage only processors that provide sufficient guarantees regarding the adoption of appropriate technical and organisational measures, ensuring that the processing complies with the requirements of the GDPR and that the rights of data subjects are protected.

11. DATA COMMUNICATION

In connection with the services we provide, the provision of certain data may be necessary to enter into or perform a contract or to send you communications, depending on the applicable legal basis.

Failure to provide the necessary data may prevent the conclusion or performance of the contract, the provision of the service or the sending of the requested communication, as applicable.

12. INTERNATIONAL TRANSFERS

As a rule, your data will be processed in the European Economic Area. Wherever possible, we select service providers, including processors, established in this geographical area.

If we transfer personal data to third countries or international organisations outside the European Economic Area, we will comply with the applicable legal provisions and ensure that appropriate safeguards are in place, in accordance with Chapter V of the GDPR.

13. ADDITIONAL INFORMATION ABOUT USE OF THE WEBSITE

Access to our website and the provision of your personal data imply and presuppose that you are familiar with the contents of this policy.

Our website may include links to external websites that are not under our control. The content and practices of those websites are the sole responsibility of the entities that manage them.

14. USE OF COOKIES

The website uses only cookies that are strictly necessary for its operation, which do not depend on the user's consent.

15. CONTACT DETAILS

Address: Rua do Campo Alegre, 830, 9.º andar, 4150-171, Porto

Email: geral@nelsonquintas.pt

Telephone: (+351) 226 079 280

16. DATA PROTECTION OFFICER

Nelson Quintas Imobiliária, S.A. has a Data Protection Officer, and this appointment has been notified to the National Data Protection Commission (Comissão Nacional de Proteção de Dados, CNPD).

For any questions relating to the protection of your personal data, you may contact the Data Protection Officer directly using the following contact details:

Address: Rua do Campo Alegre, 830, 9.º andar, 4150-171, Porto

Email: privacidade@nelsonquintas.pt

17. CHANGES TO THE PRIVACY POLICY

This privacy policy may be updated in response to legal, regulatory, technological or operational changes.

If this happens, the updated version will be made available on our website for you to consult.

18. APPROVAL AND VERSION

This privacy policy was approved by the management of the Nelson Quintas Group.

Version 3.0 – October 2026