



# PRIVACY AND PERSONAL DATA TREATMENT POLICY

Clevidence, Lda. Respects your privacy and is committed to protecting your personal data.

We ensure compliance with the legal requirements arising from the General Data Protection Regulation (GDPR) – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27/04/2016, as well as the legislation in force on the protection of natural persons with regard to the processing of personal data and the rules on the free movement of personal data.

Clevidence, Lda. (collectively referred to as "Clevidence", "we", "us" or "our" in this policy) (PT VAT number 516141287) is the controller and responsible for the collection and processing of your personal data, for the purposes referred to in this Privacy Policy and in strict compliance with and compliance with applicable legislation.

This privacy policy defines the approach taken to the privacy of the data we process, while informing data subjects (customers, suppliers and other interested parties, how we process their personal information ("personal data") and how they can exercise their rights in relation to their personal data.

Questions regarding this privacy policy, including any requests to exercise your rights over your personal data, can be made through the email address [data.privacy@clevidence.pt](mailto:data.privacy@clevidence.pt) or by letter addressed to Clevidence's Data Protection Officer, to Taguspark, Edifício Inovação II, Avenida Doutor Jaques Delors, 411-421, 2740-122 Porto Salvo.

To understand and become aware of how your personal data will be processed by Clevidence, we ask you to read this document in full.

## 1. What is our privacy commitment?

- Comply with the obligations inherent to the GDPR, and other applicable legislation, including national legislation that complements the GDPR.
- Provide the appropriate mechanisms for the exercise of the rights of personal data subjects.
- Apply the principles of transparency on the form and type of personal data we process.
- Ensure that processors who process your personal data on behalf of Clevidence act with the same level of confidentiality and security.

## 2. Who is responsible for the Collection and Processing of Personal Data?

The responsible for the collection and processing of personal data is Clevidence, Lda., headquartered in Taguspark, Edifício Inovação II, Avenida Doutor Jaques Delors, 411-421, 2740-122 Porto Salvo, PT VAT number 516141287.

## 3. What is personal data?

"Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Article 4º, of the GDPR).

## 4. How do we process your personal data?

The processing of your personal data includes the collection, recording, organization, structuring, conservation, retrieval, consultation, use, disclosure, deletion or destruction, among other operations, within the scope of the activity carried out by Clevidence.

We will only lawfully process your personal data if at least one of the following legal bases is met:

- If the data subject expresses a free, specific, informed and explicit will, by means of an unequivocal positive statement or act, the processing of his or her personal data ("consent").
- The data processing is necessary for the celebration of a contract, to which the data subject is a party, or for pre-contractual steps at the request of the data subject.
- The processing is necessary for compliance with our legal obligations.
- The processing is necessary for the purposes of our legitimate interests.

## 5. How we collect your personal data?

We collect your personal data, provided directly by you, for example, when celebrating contracts or registering for activities promoted by Clevidence.

## 6. What kind of personal data is processed at Clevidence?

Clevidence collects and processes personal data necessary for the provision of services, within the scope of its activities.

Example of the categories and type of data that Clevidence may collect and process:

- *Celebration of contract and communication with Customers/ Suppliers/ Subcontractors*
  - Identification data.

- Contact data.
- Invoice data.
- Professional data.
- *Registration in activities promoted by Clevidence*
  - Identification data.
  - Contact data.
  - Invoice data.
  - Professional data.
- *Marketing and Communication*
  - Identification data.
  - Contact data.
  - Professional data.
- *Navigation on the Clevidence website*
  - Traffic and location data.
  - Internet browsing data.
- *Selection and recruitment process*
  - Identification data.
  - Contact data.
  - Professional data.
- *Human Resource Management*
  - Identification data.
  - Contact data.
  - Invoice data.
  - Familiar life.
  - Professional data.
  - Financial and patrimonial information.
  - Other: art. 9º (data concerning health), art. 10º (data relating to criminal convictions and offences).
- *Complaints, suggestions and compliments*
  - Identification data.
  - Contact data.
  - Professional data.

## 7. Image Data

Clevidence, in the organization of events promoted by it, may resort to the production of content that includes the capture of images, videos and/or collection of testimonies where there may be the identification of the holders involved and subsequent dissemination by internal and/or external means.

For activities whose processing involves the collection and use/dissemination of images (photo, video and/or collection of testimonials) that allow your identification, we always ask for your prior consent.

## 8. What kind of personal data of special categories are processed at Clevidence?

According to the GDPR, this category includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation (Art. 9, of the GDPR).

The personal data of special categories requested by Clevidence are those strictly necessary to comply with the legal provisions to which Clevidence is obliged. The following personal data of special categories may be requested:

- Data concerning health (Art. 9, no. 1).
- Criminal convictions and offences (criminal record) (Art. 10).

## 9. What are the purposes and grounds for the processing of personal data by Clevidence?

Clevidence processes your personal data for the following purposes and based on the following legal grounds:

- Compliance with legal obligations:
  - Selection and recruitment processes management.
  - Human Resource management.
  - Invoicing.
  - Contracting mandatory insurance.
  - Mandatory communications to public authorities.
  - Archive.
  - Claims management.
  - Compliance with other legal or regulatory obligations.
- Based on the celebration of a contract (provision of services/ participation in events/ human resources) entered into with the data subjects, we process your data for the purposes of:
  - Contract management;

- Event registration and participation management;
- Based on your consent, we process your personal data for the purposes of:
  - Participation in surveys.
  - Participation and dissemination of events in Clevidence's internal and/or external media.
  - Capture and dissemination of multimedia content (Photos, video and/or testimony collection).
  - Sending informative messages, newsletters, dissemination of events and training by e-mail.
  - Participation in studies and projects.
- Because it is our legitimate interests to strengthen Clevidence's positioning, to ensure the integrity and management of our facilities, to maintain our certifications, to ensure the sustainability of the organization's human resources and to ensure the quality of the service provided, we process your data for the purposes of:
  - Entrance control.
  - Infrastructure and equipment management.
  - Protection of people and property (Taguspark video surveillance);
  - Event organization.
  - Recruitment and selection and human resources management.
  - Management of internship requests and/or collaboration in scientific work.
  - Management of requests for information, clarifications, contacts through [data.privacy@clevidence.pt](mailto:data.privacy@clevidence.pt).
  - Satisfaction Evaluation Questionnaire.
  - Management of suggestions, complaints and compliments.
  - Management of our *website*.
  - Obtaining community funds through participation in funded applications and/or national and international projects.

## **10. How long your personal data will be stored?**

The period for which your personal data is stored and retained varies according to the purpose for which the information is processed. Whenever there is a specific legal requirement, the data will be stored and kept only for the minimum period necessary for the purposes for which it was collected or further processed, after which it will be deleted.

However, if personal data is processed for scientific research purposes, Clevidence may retain some of the data for longer periods, without prejudice to applying the appropriate guarantees of the rights and freedoms of the data subject, under the terms of the legislation in force.

To determine the appropriate retention period, Clevidence takes into account the various deliberations of the European data protection supervisory authorities, namely the CNPD.

### **11. Who we share your personal data with?**

Your personal data may be shared by Clevidence with third parties, namely:

- Subcontractors who process the data on behalf of Clevidence, only for specific and agreed purposes.
- Judicial, administrative, supervisory or regulatory authorities, where such tasks are mandatory.
- The duty of confidentiality and respect for the principle of the purpose of data collection is guaranteed by Clevidence. We require all third parties to respect the security and privacy of your personal data and to treat it in accordance with the law.

If Clevidence, or duly authorized third parties, transfer your personal data outside the European Economic Area (EEA), we will ensure that a similar degree of protection can be afforded by the recipient of the data.

### **12. How we protect your personal data?**

Clevidence ensures and incorporates in all its processes a set of information security measures, technical and administrative measures and procedures aimed at preserving the confidentiality, integrity and availability of the personal data processed.

- Confidentiality: We ensure that the information is accessible only by authorized persons, for the necessary period;
- Availability: We ensure that information is available to authorised persons whenever it is needed;
- Integrity: We ensure that the information is complete and complete and that it has not been modified or destroyed in an unauthorized or accidental manner during its life cycle.

We have implemented reasonable physical, electronic, and procedural measures to ensure the protection of the information we process and store. We limit access to your personal data to essential employees and third parties who have a business need. They will only process your personal data in accordance with Clevidence's instructions and are subject to a duty of confidentiality.

Among others, we highlight the following measures:

- Physical access control.
- Logical access control.

### **13. How you can exercise your rights as a personal data subject?**

To exercise your rights, requests for clarification or to obtain additional information, you can contact us at the following email address: [data.privacy@clevidence.pt](mailto:data.privacy@clevidence.pt).

Personal data subjects have the following rights:

- Right to be Informed (art. 13º and art. 14º, of the GDPR) – you have the right to be informed by us in a concise, transparent, intelligible, and easily accessible way about the collection and use of your personal data;
- Right of Access (art. 15º, of the GDPR) – you have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and other supplementary information;
- Right of Rectification (art. 16º, of the GDPR) – you have the right to have inaccurate personal data rectified or completed if it is incomplete;
- Right to Erasure («Right to be forgotten») (art. 17º, of the GDPR) – you have the right to have your personal data erased whenever one of the grounds provided for in the legislation applies.
- Right to Restriction of Processing (art. 18º, of the GDPR) – you have the right to request the restriction or suppression of your personal data in certain circumstances.
- Right to Data Portability (art. 20º, of the GDPR) – you have the right to obtain and reuse your personal data for your own purposes across different services. This right only applies to the data you have provided to us.
- Right to Object (art. 21º, of the GDPR) – you have the right to object to the processing of your personal data in certain circumstances.
- Right Not to Be Subject to Automated Individual Decisions (art. 22º, of the GDPR) – When I request human intervention in processes that are usually automatic.
- Right to have a response from the controller within the legal deadlines and the right to know of a personal data breach (art. 34º, of the GDPR).
- Right to withdraw consent, at any time, without compromising the lawfulness of the processing carried out on the basis of the consent previously given (art. 7º, of the GDPR).

#### **14. How can you contact Clevidence?**

Whenever you need to, you can exercise these rights, through the following means:

- E-mail: [data.privacy@clevidence.pt](mailto:data.privacy@clevidence.pt).
- Post mail addressed to: Clevidence, Taguspark, Edifício Inovação II, Avenida Doutor Jaques Delors, 411-421, 2740-122 Porto Salvo.

If necessary, you can file a complaint with the CNPD, through the *website* [www.cnpd.pt](http://www.cnpd.pt), or by letter addressed to the Av. D. Carlos I, 134, 1.º, 1200-651 Lisboa and the contacts of Tel. 213 928 400, Fax 213 976 832, e-mail [geral@cnpd.pt](mailto:geral@cnpd.pt), or to apply to the ordinary courts.

## 15. What are the terms of use of our website?

The Terms of Use outline the rules and regulations for the use of Clevidence, Lda. (collectively referred to as "Clevidence", "we", "us" or "our" in these Terms of Use) website, located at <https://clevidence.pt/>.

Please read the Terms of Use carefully before you start to use the website. By using the website, you accept and agree to be bound and abide by these Terms of Use, and our Privacy Policy. If you do not want to agree to these Terms of Use, including our Privacy Policy, you must not access or use the website.

Clevidence may revise and update these Terms of Use at any time without notice. All changes are effective immediately when we post them and apply to all access to and use of the website thereafter. Your continued use of the website following the posting of the revised Terms of Use means that you accept and agree to the changes. You should check this page regularly to be aware of any changes as they are binding on you.

- The content of this website is protected by copyright laws and other protective laws. The content of this website may only be copied for the purpose of individual non-commercial use, while maintaining all references regarding copyright or other applicable property rights. Consequently, the content of this website may not be reproduced, copied, or otherwise redistributed, without the express written consent of Clevidence. In addition, the name Clevidence is a registered trademark and may not be used without the written consent of Clevidence.
- Clevidence will use reasonable efforts to include accurate and up-to-date information on this website but does not provide warranties or representations of any kind as to its accuracy, timeliness, quality, completeness or fitness for purpose.
- Clevidence shall not be liable for any loss, damage or cost or any other arising as a result of reliance on information on this website, your access, use or inability to use this website, or any errors or omissions in your content. This limitation includes any loss, damage or cost caused by viruses that infects your computer's equipment, software, or data. The users of this website agree that the access and use of the same and all the presented content are done at their own risk.
- This website may contain links or references to other websites maintained by third parties over which we have no control. We do not monitor, revise or approve any content of third-party websites, and Clevidence is not responsible for the privacy policies and practices of third parties whose websites have a hyperlink on our website. We recommend that you read the terms of use and the privacy policies of other websites that are linked to our website.
- This website and its contents are in compliance with Portuguese legislation. Other countries may have laws and regulatory requirements different from those in Portugal. These Terms of Use and access to and use of this website are governed by and construed in accordance with Portuguese



law. The Portuguese courts shall have exclusive jurisdiction over any disputes arising in connection with this website.

#### **16. How we use Cookies on our website?**

Cookies are small pieces of information that can help identify your *browser* and that can store information, for example, user settings and preferences.

Clevidence uses *cookies* on its *website*, with the aim of improving the quality of the service, the features available and the user experience, and are not used for profiling.

You can set your *browser* to refuse all or some *browser* cookies, or to alert you when *websites* set or access *cookies*. If you disable or refuse *cookies*, please note that some parts of this *website* may be inaccessible or not function properly.

#### **17. Changes to the Privacy Policy**

Clevidence reserves the right to update this Privacy Policy at any time. This policy should be consulted regularly on our website so that you stay informed about the processing of your personal data.

This Privacy Policy was last updated in October of 2024 (Porto Salvo, Portugal).