

Privacy Policy

1. IDENTIFYING THE PERSON RESPONSIBLE FOR PROCESSING PERSONAL DATA AND DATA PROTECTION OFFICER

- i. Company name and person responsible for Processing Personal Data: IDEIAHUB, LDA (hereinafter referred to as "IDEA")
- ii. Head office: Av. D. João II nº 35 - 11ºA, 1990-083 Lisbon – Portugal
- iii. NIPC (Corporate Portuguese Tax Number): 510810128
- iv. Data Protection Officer – DPO: Mara Franco Mazzeo, dpo@ideaspaces.pt, Av. D. João II 35 - 11ºA, 1990-083 Lisbon.

1.1. IDEA's Data Protection Officer – DPO, with the following duties:

- Liaising with the user to clarify matters concerning IDEA's processing of their data;
- Cooperating with the supervisory authority – the Portuguese Data Protection Commission (hereinafter referred to as CNPD);
- Informing and advising IDEA and its employees on their obligations under the legal system relating to the protection of personal data;
- Monitoring the company's compliance with the legal system on personal data protection as well as with the guidelines on personal data protection, including the allocation of responsibilities, raising awareness and training personnel involved in processing operations and the corresponding audits;
- Providing advice, upon request, with regard to impact assessment and monitoring its implementation;
- Being a contact point and support the supervisory authority in matters relating to the processing of data.

2. SETTINGS AND PERSONAL DATA CONSENT

- 2.1. The terms "*controller*", "*processor*", "*personal data*" and "*processing*", as well as any other related expressions and terms, shall be interpreted in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of the 27th of April 2016, and in accordance with Law 58/2019 and Law 59/2019, both of the 8th of August, concerning the protection of individuals and the processing of their personal data and its circulation. This is complemented by interpretations and guidelines issued by European and national authorities, standard clauses approved by the European Commission or supervisory authorities, as well as any relevant case law (jointly referred to as "General Data Protection Regulation" - hereinafter referred to as GDPR).
- 2.2. "*Personal data*" is information relating to an identified or identifiable natural person ('data subject'), an identifiable natural person being one who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, electronic identifiers or one or more factors specific to the physical, physiological, genetic, mental,

economic, cultural or social identity of that natural person, not including the data of legal persons.

- 2.3. "*Processing*" is an operation or set of operations which is performed on personal data or sets of personal data, whether or not by automatic means, such as collecting, recording, organising, structuring, storing, adapting or changing, retrieving, consulting using, disclosure by transmitting, disseminating or otherwise making available, comparing or interconnecting, limiting, erasing or destroying.
- 2.4. The "*Personal Data Holders*" are considered to be the user, who will be the person who enters into the service contract with IDEA.
- 2.5. Depending on the type of services provided, the following may be collected: IP address; name; age; tax identification number; identification number; social security number; identification document number; address; email address and mobile phone number.
- 2.6. The expressions defined above in the singular may be used in the plural, and vice versa, with the corresponding change of meaning.
- 2.7. However, by accepting this Privacy Policy, the user gives his/her informed, express, free and unequivocal consent for the personal data provided through the website www.ideaspaces.pt and the app to be included in a file under IDEA's responsibility, complying with the appropriate technical and organisational security measures, under the provisions of the GDPR and national legislation indicated above.
- 2.8. IDEA maintains a database with the registration of its users and customers.
- 2.9. Under no circumstances shall information be requested which reveals a person's racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data that uniquely identifies a person, data concerning health or data concerning the sexual life or sexual orientation of a person.
- 2.10. By accepting this privacy policy, the user guarantees and declares that the personal data provided to us belongs to him/her and that they are true, accurate and up to date.
- 2.11. The user must also inform us immediately of any changes to his/her personal data.
- 2.12. Should any of the provisions of this privacy policy be declared void or in any way invalid, ineffective or impracticable by a competent entity for this purpose, such invalidity, ineffectiveness or impracticability shall not affect the validity of the remaining provisions of this privacy policy, and IDEA agrees, in good faith, to replace that provision and that, as far as possible, it will produce similar effects.

3. PURPOSES OF PROCESSING AND COLLECTING PERSONAL DATA

3.1. Your personal data will be processed on the basis of the following grounds and for the purposes described below, which depend on the specific context in which they are collected:

a) Consent

It happens when you give your express written, free, informed, specific and unambiguous consent. Examples include consenting to promotional communications.

b) Contract execution and pre-contractual arrangements

It happens when the processing of personal data is necessary for entering into, executing, and managing the contract with IDEA. Examples include data for the preparation of a service or information proposal, contact details, information and requests, billing, collection, and payment.

c) Complying with a legal obligation

It happens when processing personal data is necessary to comply with a legal obligation to which IDEA is subject to, such as the communication of identification data or the use of communication services to police, judicial, fiscal, or regulatory bodies or location data to ensure emergency services.

d) Legitimate interests

It happens when the processing of personal data is in the legitimate interests of IDEA or a third party, such as to improve the quality of service, ensuring the security of the network and services or detecting fraud.

3.2. The following personal data is collected: IP address; name; age; tax identification number; civil identification number; social security number; identification document number; address; email address and mobile phone number.

3.3 We also collect personal data when you enter into a service contract with IDEA.

3.4 The collection may be in writing through the IDEA website and app or through IDEA's own technologies such as cookies (cf. point 9 on the cookies policy).

3.5. IDEA, as the data controller, has the following duties:

- i. To ensure the processing of personal data is used for the intended purposes or compatible purposes;
- ii. To collect, use, and retain only necessary personal data for the purpose in question;
- iii. Not to transmit any personal data for commercial or advertising purposes;
- iv. To process personal data for lawful purposes or for the provision of services at your request.

3.6. The personal data will only be used for the following purposes:

- (i) Service contract;
- (ii) Communication with users and clarification of doubts;
- (iii) Processing requests for information;
- (iv) Processing complaints;
- (v) Statistical analysis of activity;
- (vi) Verifying, maintaining, and developing statistical systems and analysis;
- (vii) Direct marketing communications (if consent is given);
- (viii) Conducting satisfaction surveys;

- (ix) Compliance with legal obligations;
- (x) Accounting, tax and administrative management;
- (xi) Information security control;
- (xii) Debt collection management.

3.7 If the user does not agree with the above conditions, IDEA may not engage with him/her through its web page and App.

4. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

4.1. We do not use the personal data collected through the website, app, or services for the following purposes:

- Transfer personal data to other people or entities, without the prior consent of the data holder, unless the transfer is necessary for the purposes indicated above;
- Transfer personal data outside the European Economic Area (EEA), without the prior consent of the data subject, unless the transfer is necessary for the purposes stated above.

4.2. However, your personal data may be transferred to processors in your name and on behalf of IDEA. IDEA has a duty to ensure that processors respect and protect the personal data of the data subject.

4.3. Personal data may also be transferred to third parties, such as IDEA's partner companies, or entities to which the data must be communicated under the applicable legislation, such as the Tax Authority, police authorities, regulatory authorities, judicial bodies, government bodies or other public authorities.

5. SECURITY MEASURES FOR COLLECTED PERSONAL DATA

5.1. IDEA declares that it has implemented the technical and organisational security measures necessary to ensure the security of personal data provided, with a view to preventing its modification, loss, unauthorised processing and access or any other form of accidental or illicit processing.

5.2. IDEA guarantees the confidentiality of all data provided by its users.

5.3 The collection and processing of data is carried out in a secure manner that prevents their loss or manipulation.

5.4 Personal data is processed with the legally required level of protection to ensure its security and prevent its modification, loss, processing, or unauthorised access.

5.5. The user declares and accepts that Internet security measures are not unbreakable.

5.6. IDEA, when accessing any personal data, agrees to:

- i. Store them by legally required technical and organisational security measures that guarantee their protection, thus avoiding the modification, loss, processing, or unauthorised access, in accordance with the state of the technology, the data's nature and the possible risks to which they are exposed;
- ii. Use the data exclusively for the purposes indicated above;
- iii. Make sure that the data is processed exclusively by employees whose involvement is necessary for providing the services and who are bound to secrecy and confidentiality;
- iv. Should the information be disclosed to third parties, they shall be obliged to keep the due confidentiality in accordance with this privacy policy.

6. COMMERCIAL COMMUNICATIONS

6.1. Advertising shall be sent only to those users who have given their prior explicit consent.

6.2. If the user wishes to stop receiving advertisement from IDEA, he or she may object by sending an e-mail to the following contact: remove@ideaspaces.pt.

7. RIGHTS OF THE PERSONAL DATA HOLDERS

7.1. You have the right to withdraw consent to the processing and collection of your personal data at any time.

7.2. In accordance with the provisions of the GDPR and Portuguese data protection legislation, the user may at any time exercise his/her access rights (information about his/her data and its processing, as well as its underlying purpose), correction or updating, erasure of data no longer necessary, limitation, opposition and portability of his/her personal data, by the following means:

Address - registered post with acknowledgement due: Av. D. João II nº35 -11ºA
- 1990-083 Lisboa

E-mail: dpo@ideaspaces.pt

Phone: 210126565

7.3. If the user wishes at any time to be removed from IDEA's database, he/she may exercise this right through the above means.

7.4. If the use of your personal data is based on your consent, you have the right to withdraw it to the processing and collection of your personal data at any time.

7.5. A response must be provided within a maximum of 30 days unless it is particularly complex.

7.6. The user may complain to the CNPD at www.cnpd.pt.

8. STORAGE OF PERSONAL DATA

8.1. Except in specific cases provided for by law, the user's personal data shall be kept by IDEA for the necessary processing period, in accordance with the respective purpose, or until the user exercises his/her right to object, to be forgotten or to withdraw consent.

8.2. The storage periods may change according to the associated public interest, historical, scientific, or statistical reasons, with IDEA agreeing to adopt appropriate storage and security measures.

8.3. After the respective storage period has elapsed, IDEA will eliminate or anonymise the data when it should not be stored for any other purpose.

9. Cookies Policy

9.1 Cookies are intended to recognise the user whenever he/she accesses the website and app to provide, analyse, understand, and improve usability. This allows us to enhance the website and app's quality and monitor the actions and traffic of visitors, eliminating the need to repeatedly enter the same information.

9.2. Cookies are essential to the operation of the Internet, they do not damage the user's device and, if activated in the configuration of your browser, help to identify and resolve possible errors in the website and app's operation.

9.3. When accessing the IDEA website and app, you must expressly accept the use of Cookies on your devices. If Cookies are disabled or stopped from being used, some of the features available on the website and app may not function properly, and the performance of certain tools may be impaired.

9.4. Cookies used by IDEA do not collect personal information that could identify the user, but only store generic information, such as the method or region of access etc.

9.5. The types of cookies used on the IDEA's website and app are the following:

- Cookies that are essential for the provision of services - necessary for the navigation and use of the website and App and all of its features, guaranteeing access to private areas of the website in order to provide services, namely session cookies.
- Analytical Cookies - necessary to collect information for statistical analysis of navigation and use of the website and app.
- Customisation cookies - Cookies that allow IDEA's websites, applications and services to recognize user choices when they use our services.
- Advertising Cookies - Cookies used by companies outside IDEA to provide users with ads relevant to them, covering the possibility of limiting the number of times an ad is displayed.

9.6. The information generated by the use of cookies may be sent to third parties for trend analysis, navigation tracking and performance, without identifying the user.

9.7. In accordance with current legislation, we provide the information that allows the user to configure his/her browser to manage and maintain his/her privacy and security relating to Cookies.

9.8. Cookies settings can be changed in your browser preferences.

10. PROHIBITED ACTIVITIES

The user acknowledge and agree that it is prohibited to access or use (or attempt to access or use) the link for any online activity, that violates legislation or that could prejudice IDEA or third parties, or interfere with the use of the network by others ("Prohibited Activities").

Among others, the user cannot, for example:

- upload or send through link
 - virus, worms, spam or others that interfere with or disrupt the normal functioning of a computer or network;
 - Any defamatory, offensive or obscene information;
- Carrying out an online activity that may result in an excessive load on the network or infrastructure or that violates or threatens the security of the system or network, as well as that of our users or third parties, including any attempt to violate restrictions imposed on the user to access or use the link or other websites;
- use the connection to infringe or violate the intellectual property rights or property rights of others;
- share the IP address or ISP connection with third parties;
- reproduce, transmit, disseminate or sell the connectivity or authorize third parties or other entities to use the connection, whether for profit or not, without our express written permission.
- upload, share, host, etc, obscene or offensive content;
- upload, share, host, display, modify, publish, update or transmit information of the following nature:
 - Information belonging to another person over which the user is not entitled;
 - Information that is harmful, abusive, defamatory, obscene, pornographic, paedophile, which incite to hatred or that is illegal in any other way;
 - Information that encourages or is related to money laundering or gambling activities;
 - Information that may harm minors in any way;
 - Information that violates any intellectual property or privacy rights;
 - Misleading, threatening or offensive information;
 - Information that represents another person;
 - Information that contains any computer virus or other virus that damage computers;
 - Information that incites the practice of an offense or that blocks investigation in the event of an offense.

The violation of the above conditions can result in civil and criminal procedure.

We can report such violations to the appropriate authorities and cooperate with them to process users who violate these terms. We have the right to suspend or block access the use of the link and other services we provide and to block or delete any communications or materials shared through the link.

11. EXEMPTION FROM LIABILITY

11.1. IDEA is not liable for any damages resulting from civil liability arising from the user's correct or incorrect use of its services, websites and their contents, including improper access to the user's computer and computer system by third parties.

11.2. In the services, websites and portals managed by IDEA there are contents and services made available by third parties, and it is the responsibility of these entities to update them.

11.3. Therefore, IDEA cannot be held responsible for the complete accuracy and timeliness of any information on its websites.

12. CHANGES TO THE PRIVACY POLICY

12.1. This privacy policy, which you should read carefully, may be changed, considering that the changes take effect from the date of its publication on this website, making express reference to the revision date.

12.2. When any change occurs, the user will be informed about it and about the date in which it takes effect.

13. APPLICABLE LAW

This privacy policy is governed by the applicable provisions of the Portuguese law.

14. DISPUTES

The Lisbon District Court is the only jurisdiction competent to judge all issues arising from this privacy policy, with express waiver of any other.

Last updated: 20th May 2020