

Privacy Policy

At **Tlantic Portugal - Sistemas De Informação, SA**, (named of “**TLANTIC**”), we guide our conduct taking into account that the use of your personal data must be subject to the highest security criteria and standards, so we have adopted technical and organizational measures appropriate for the purpose.

In this way, we commit to treat your personal data in an integral and confidential method, considering only clear and precise purposes, letting you know, through this policy, how this treatment occurs.

1. Who is responsible for the treatment of your personal data?

The person responsible for the processing of personal data is **TLANTIC**, headquartered at Rua Manuel Pinto de Azevedo, nº 626 - 1º Piso, 4100-320 Porto, Portugal, which defines the data collected, ways of treatment and the purposes for which these data are used.

Personal information is any and all information relating to a natural person, identified or liable to be identified, that **TLANTIC** deals with in the scope of its business activity.

2. Who are the holders of personal data?

The representative or contact person in the company or its worker, in the case of legal persons, who in the scope of the execution of a contract or pre-contractual diligence, or in the context of any other contact in the business scope, establish relations with **TLANTIC**.

The candidate, a natural person, wishing to submit a job application to **TLANTIC**.

2.1. Wich categories of personal data are treated by TLANTIC?

We only collect the data necessary for the proper execution and management of your relationship with **TLANTIC**, such as:

- i) Contact Information: such as name, e-mail, phone number, company.
- ii) Personal information: such as the identification number or position within the company.
- iii) Curricular information: such as academic qualifications and other information contained in the curriculum vitae.

2.2. How, when and for what purposes is your personal data collected?

Your personal data may be collected in the following circumstances and for the following purposes:

1. When you enter and develop a contract with us in the context of our activity, for example when you are a representative or employee of a customer or a company with whom we have contractual relationships.
2. When, within the scope of our activity, we establish commercial contacts, for example when you are a representative or worker of a customer or a company with whom we have contact with, with the purpose of establishing contractual relations.
3. When you establish contact with us, through the TLANTIC website.

3. What are the grounds and duration of the processing of personal data?

The grounds that legitimize the processing of your personal data by **TLANTIC** are:

Consent: your personal data can be processed by manifestation of will free, specific, informed and explicit, in terms of which you accept, by means of an unequivocal positive statement or act, that your personal data can be processed.

Pre-contractual diligences and/or contract execution: your personal data may be necessary to clarify doubts, for the celebration, execute and manage the contract with **TLANTIC**.

Compliance with legal obligation: your data may be necessary to fulfill a legal obligation to which the controller, in this case **TLANTIC**, is subject.

Legitimate interest: your data may be necessary to carry out certain tasks related to the business activity of **TLANTIC**, except in cases where your privacy and data protection rights should prevail.

In this way, **TLANTIC** will process your personal data, according to the following:

3.1. How long do we keep your personal data?

TLANTIC keeps the personal data of the holders only for the period strictly necessary to pursue the purpose for which they were collected, namely within the scope of legal obligations to which it is attached or during the period in which the legal person it represents or for whom it works establish a contractual relationship with **TLANTIC** or during the period in which pre-contractual steps are established. We may keep your personal data for longer periods, based on your consent or in situations where there is a legitimate interest for **TLANTIC**, always respecting the period necessary to pursue the purpose for which it was collected.

In the absence of a specific legal obligation, your data will be processed only for the period necessary to fulfill the purposes that motivated its collection, and as long as there are legitimate grounds that allow its conservation by **TLANTIC**.

Your personal data, when processed for the purposes of job applications, will be kept for a maximum period of **12 months** from the collection of your consent and if, within this period, you have not withdrawn your consent.

Once the maximum retention period has been reached, personal data will be irreversibly anonymized (anonymized data may be preserved) or will be destroyed in a secure way.

4. To whom do we transmit your personal data?

TLANTIC transmits your personal data only when necessary for the purposes described above.

TLANTIC's suppliers and service providers are contractually subject to the same terms and conditions for the treatment of personal data that this privacy policy establishes, and are prohibited from using, transferring, disclosing or registering the holder's personal data for any other purpose. than the one for which they were specifically hired.

TLANTIC may transmit your personal data, depending on the purpose for which they were collected, to different recipients, and only the data necessary for the development of the activity pursued by these entities will be transmitted within the scope of the purposes identified in this privacy policy. Your personal data may also be transmitted to entities to whom the data must be communicated under the law.

The activity and business structure in which **TLANTIC** is inserted may involve the transfer of personal data from data subjects to third countries (which do not belong to the European Union or the European Economic Area). In such cases, **TLANTIC** will implement the necessary and appropriate measures in light of the applicable law to ensure the protection of the personal data being transferred, strictly complying with the legal provisions regarding the requirements applicable to such transfers.

5. What are the rights of the holders of personal data?

TLANTIC guarantees the applicability and compliance with all rights of the holder of personal data provided for in the General Data Protection Regulation and national legislation in force.

- **Right of access**

You have the right to obtain confirmation that your personal data are or are not being processed and, if that is the case, the right to access your personal data and information relating to that same treatment, for example, you can request an exact copy of your compilation and request additional information about the treatment that we made.

- **Right of Rectification**

You also have the right to obtain, without justified delay, the rectification of your inaccurate personal data, namely the right to correct or complete your personal data.

- **Right to withdraw consent**

You can, at any moment, change your consent, limit it to certain types of treatment or withdraw it, however, the withdrawal of consent does not compromise the lawfulness of the treatment carried out based on the consent previously given.

- **Opposition Right**

You may also oppose, at any moment, the processing of your personal data, when there are no compelling and legitimate reasons for the treatment that prevail over your interests, rights and freedoms, or for the purposes of declaration, exercise or defense of a right in a judicial process.

- **Direito à Limitação do Tratamento**

In certain situations, you have the right to obtain a limitation on the processing of your data, namely if you challenge the accuracy of personal data for a period that allows verifying its accuracy, in cases where the data are no longer necessary for the purposes of processing but are still required by the holder for the purpose of declaring, exercising or defending a right in the context of a judicial proceeding and even when he opposes the treatment, until it becomes clear that **TLANTIC's** reasons of legitimate interest, prevail over his own, as well as in other legally provided cases.

- **Right to not be subject to any automated decision**

You have the right to not be subject to any decision taken solely based on automated treatment, including the definition of profiles that have an influence on your legal sphere or that significantly affect you in a similar way.

5.1. How to exercise your rights?

You will be able to exercise your rights free of charge, unless it is a manifestly unfounded or excessive request, in which case a reasonable fee may be charged considering the costs.

We will respond to your requests within a maximum of 30 days, except in cases of more complex requests.

In effect, you can exercise your rights through the following

E-mail: [info@tlantic.com]

Still, and if you are not satisfied with our response after exercising any of these rights, you have the right to file a complaint with the CNPD (National Data Protection Commission, Av. D. Carlos I, 134 - 1. 1200 -651 Lisbon, Tel: 351 213928400, Fax: +351 213976832, e-mail: geral@cnpd.pt).

6. Procedural and Technical Security Measures

TLANTIC makes use of appropriate physical, technological, organizational and security measures to protect your personal data in order to protect the personal data made available to us, against its dissemination, loss, misuse, alteration, treatment or unauthorized access.

7. Update of privacy policy

TLANTIC reserves the right to update this Privacy Policy at any time. Therefore, it is recommended that you periodically consult this policy on our website to keep yourself informed about the processing of your personal data.

Without prejudice to the consultation of this policy on our website, **TLANTIC** will inform you of the changes made through the various communication channels used by it.

This Privacy Policy was last updated on [01/01/2020]