

DATA PROTECTION AND PRIVACY POLICY

E.near considers that every visitor to its website is of the utmost importance, whether they are clients, potential clients, employees or potential employees and suppliers. Every effort has been made to implement technical and organisational measures to uphold data protection, privacy and respect for rights and guarantees when processing personal data.

This Data Protection and Privacy Policy makes known how **E.near**, in the course of its activities, processes Personal Data and ensures its privacy, security and integrity.

1. Responsibility for the processing of Personal Data:

E.near is responsible for the processing of Personal Data

Address: Alameda dos Oceanos, 115, 1990-392 Lisbon

Contact: hello@enear.co

2 – Data Processing Principles

Data processing is conducted in compliance with the General Data Protection Regulation and other applicable national and European legislation, namely:

- **E.near** stores identifiable Personal Data no longer than is strictly required for the processing purpose.
- **E.near** adopts adequate technical or organisational measures to ensure all Personal Data are processed in a way that guarantees their security, including protection against unauthorised or illicit processing and abusive use, loss, destruction or accidental damage.
- **E.near** ensures all Data are processed in a loyal, legal and transparent manner.

3 - Personal Data, Personal Data Processing and Data Subject:

‘Personal Data’ shall mean all information and/or elements which, irrespective of the medium, may allow **E.near** to identify or render identifiable any given natural person in particular by reference to an identifier such as a name, an identification number, location data and/or electronic identifiers or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

‘Personal Data Processing’ shall mean any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

In the context of activities undertaken by **E.near**, 'Data Subject' may include, without limitation: job candidates, current and former employees, partners and their employees, suppliers, service providers and their employees, customers or potential customers and other visitors.

E.near may collect personal data from people under 18 when provided by their parents or legal guardians, whenever legally required, deriving from legal obligations, or whenever express consent is given, for the purposes envisaged by this Policy.

4. Categories of Personal Data processed by Company Name:

In the course of its activities **E.near** may process Personal Data from a significant number of Data Subject categories. Personal Data collected by **E.near** always depend on the nature of the interaction but may include the following Data Categories: a) Identification data; b) Personal contact data; c) IT usage data; d) Commercial data for service provision and/or information provision.

5. Basis for Personal Data Processing:

With regard to the principle of "Lawfulness of processing", **E.near** shall only process Personal Data whenever a basis of lawfulness exists that justifies processing, *inter alia*:

a) Compliance with legal obligation; b) Performance of a contract, or steps taken at the request of the data subject prior to entering into a contract; c) Consent: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or clear affirmative action, signifies agreement to the processing of personal data relating to him or her; d) Protection of vital interests of the Data Subject; e) Pursue of Legitimate Interests.

6. Personal Data storage period

E.near stores Personal Data only for such time as is necessary for the purposes for which they were initially collected. **E.near** may, however, be required to store some Personal Data for a more extended period, when considering: Legal obligations, judicial or administrative proceedings and guidelines from personal data protection supervisory authorities. Personal Data Processing by **E.near** shall be pursuant to this Data Protection and Privacy Policy. When such Data is no longer needed, **E.near** shall be securely destroyed.

7. Sharing Personal Data

In the course of its activity, **E.near** may share data with third parties only in the ways described in this section of the Data Protection and Privacy Policy, *inter alia*:

- a) Personal Data may be shared with undertakings of Grupo E.near, S.A.,
- b) At the request of or with the consent of the Data Subject, Personal Data may be shared with other entities.
- c) In compliance with legal and/or contractual obligations, Personal Data may also be transmitted to judicial, administrative, supervisory or regulatory authorities and to entities that conduct lawful data collection activities, fraud prevention and deterrence activities, market studies or statistical studies.

8. Your rights and how they can be exercised:

As Data Subject, whose data is processed by **E.near**, you have the following rights:

- a. Right of access;
- b. Right of rectification;
- c. Right to object, particularly with regard to processing;
- d. Right to erasure;
- e. Right to restriction of processing;
- f. Right to data portability;

Should you wish to exercise your under the Personal Data Protection Act and other relevant legislation, you may do so in writing via hello@connect-enterprises.com.

9. Security and Integrity:

E.near will process Personal Data only for the purposes identified in this Policy, in accordance with the internal policies of **E.near** and using technical and organisational measures designed according to the risks associated with the specific processing of Personal Data. The technical and organisational measures designed ensure, to the maximum extent possible, Personal Data security and integrity, especially concerning unlawful or unauthorised processing and its accidental loss, destruction or damage. **E.near**, however, cannot guarantee Data security when transmitted over the open network, as information transmitted over the Internet is not entirely secure.

10. Confidentiality

E.near acknowledges that the information provided may be confidential. In the course of its activity, **E.near** does not sell, rent, distribute or otherwise make Personal Data available commercially or otherwise to any third party, except in cases in which it must share information with Service Providers for the purposes established in this Policy, or to Third Parties for the purpose of fulfilling their legal obligations. **E.near** preserves the confidentiality and integrity of your Data and protects it in accordance with this Data Protection and Privacy Policy and all applicable laws.

11. Cookies:

E.near uses cookies to collect information about the use of its web pages. In each visit to the web pages, **E.near** processes Personal Data collected through the use of cookies in accordance with the published cookies policy. For more information about the use of cookies, we recommend you read and review our Cookies Policy regularly for the most up-to-date versions.

12. Changes to this Data Protection and Privacy Policy:

E.near will periodically update this Privacy Policy. Whenever this happens, the newer version shall be posted on the Internet and shall take effect immediately, so we recommend you visit it regularly.