

PRIVACY AND COOKIE USE POLICIES



This document establishes the Privacy and Cookie Use Policies (hereinafter "Policy") of Espaço Coordenado Lda, a company incorporated and headquartered in Portugal, with the single legal person number 508570425, its successor companies or authorized assignees (hereinafter "OBRASEGURA") and which apply when a Client or User ("Client") transmits to OBRASEGURA any of their own personal data or that of third parties, identified or identifiable individuals ("Data") including whenever the Client or User uploads their own or Third Parties' personal Data into any Forms available from the www.gestplano.com (the "Website") or the GESTPLANO Platform (the "Platform") both jointly and indistinctly referred to as "CHANNELS".

Our Privacy Policy does not extend to all spaces where we may be present, nor to relations with any Third Parties. On social networks and/or platforms, as well as on communications, chat and professional collaboration platforms, our interaction may be governed by the Privacy and Cookie Policies of the operators and managers of these channels, and OBRASEGIURA is completely unrelated to them.

In the event that the Client has any reservations, doubts or objections to this Policy, the Client must immediately suspend access to and use of the CHANNELS, withdraw from them and refrain from continuing with their use and/or transmitting any Data to OBRASEGURA, including by submitting the Contact Form on the Website.

OBRASEGURA reserves the right to amend this Policy at any time and without prior notice. Any periodic changes to this Policy will be automatically incorporated into this version with effect from the date of publication. Continued use of the CHANNELS implies that the Client is aware of this Policy, has read it, understood it and accepts it in the version that is in force at any given time.

Revised version updated and in force since March 7, 2022.

What data and how is it collected?

OBRASEGURA - IN ANY OF ITS CHANNELS - ONLY COLLECTS DATA AND METADATA THAT IS ESSENTIAL OR VOLUNTARILY SUBMITTED BY THE DATA SUBJECT OR WITH THEIR CONSENT UNDER THE TERMS AND FOR THE PURPOSES OF THE LEGISLATION IN FORCE AND IN ACCORDANCE WITH THIS POLICY. THE DATA SUBJECT IS AT ALL TIMES FREE TO REFUSE TO PROVIDE CONSENT FOR CERTAIN ACTIVITIES INVOLVING THE PROCESSING OF THEIR PERSONAL DATA, WHETHER BY OBRASEGURA OR ANY OTHER ENTITY, AND MAY WITHDRAW ANY CONSENT THEY HAVE PREVIOUSLY PROVIDED AT ANY TIME, AT THEIR SOLE AND FAIR DISCRETION.

In addition to the above, our CHANNELS use Cookies. [TO FIND OUT MORE CLICK HERE](#).

1. WEBSITE

On the Website we may collect Data in the following cases:

- ✓ To be able to display the website on your device:

The website can be visited anonymously, but we still have to collect browsing data such as your electronic identifier, start date/time of the connection, end date/time of the connection, place of origin of the web browsing, *URL* visited, social network address or *host name*, without which, it is not technically possible for us to communicate with the *browser* and display the Website on your device.

- ✓ Contact form on the website

Your name, email address, contact details and narrative with OBRASEGURA will be received and processed offline by the OBRASEGURA team in order to follow up on your request.

- ✓ Statistical and Anonymized Information

OBRASEGURA may process aggregated demographic data in a generic and anonymized form completely uncorrelated with Data from browsing data on the Website, which may include the browser name, the device name, the type of computer or technical information about the user, means of connection to the Internet such as the Operating System or the Internet Service Provider. Whenever OBRASEGURA shares information of this type, it always does so in a separate database in order to guarantee that the information remains anonymous and cannot be reversed in order to make any Data accessible.

✓ Curriculum Data. Recruitment processes

From the Website we may also collect Data when you submit a spontaneous application or wish to apply for a recruitment process. We may process your Data such as the date of application, interview results, test results, curriculum vitae or qualification certificates, on the basis of the execution of a pre-contract (possibly with a view to its conclusion) and in the legitimate interest of both. In cases where you are not selected, we may continue to process your data in a compatible manner for the purposes of other internal processes that may arise.

The Website does not automatically process or register any OBRASEGURA Customer.

2. GESTPLANO PLATFORM

All services provided by OBRASEGURA on the Platform are for professional use only (not intended for end consumers) ("Professional Client" or "Client").

The Platform enables the processing of professional and employee data at the service of the Professional Client and has specific privacy settings that can be managed by its resources with specific access privileges (Main Admin and Secondary Admin).

The GESTPLANO Platform is a mere instrument of the Customer for the processing activities it carries out as the Entity Responsible for processing the Data of the data subjects who upload their Customer profile. The Customer's interaction activities on the Platform (and those of its employees who operate it) correspond to Data processing instructions, which the Platform carries out automatically in accordance with its technical configurations and functionalities.

Refusal to provide consent or withdrawal of consent previously provided on the Platform may only prevent the Platform from understanding an instruction, associating an instruction with a holder or being able to fully apply a specific purpose (e.g. recognizing and validating an individual's entry to certain facilities, recognizing an individual associated with a professional certification, etc.).

The OBRASEGURA Platform may also process data from legal persons, which are not covered by the same provisions herein ("Corporate Data").

OBRASEGURA's Professional Client grants OBRASEGURA a pre-paid, non-exclusive, sub-licensable, perpetual, unlimited license to process their data.

Business Data for the purposes pursued by OBRASEGURA, including those concerning the activity it carries out, customer feedback, marketing and promotional offers from OBRASEGURA or partners. There are specific options on the Platform that can be managed by the Professional Customer to limit this type of activity on the part of OBRASEGURA, particularly at Partner level.

Depending on the type of services you contract with OBRASEGURA, we may collect the following Data directly from you or from your activities on the GESTPLANO Platform (as its subcontractors):

- ✓ Personal data such as your name, tax number, address, telephone and/or mobile number, email address, date of birth, profession, curriculum and aptitude data or professional certification, gender, bank account number and/or other banking information;
- ✓ Professional, life history and professional aptitude data of holders under the control of OBRASEGURA Clients on the Platform;

To the extent that the Professional Client is an individual or acts on behalf of an institutional client, this Policy applies to the Data uploaded or disclosed to OBRASEGURA and may include the name, email address, professional and curricular data, occupational hygiene, safety and health data and/or others depending on the information provided to OBRASEGURA within the scope of the professional collaboration established and the services contracted on/with recourse to the Platform.

- ✓ Location data: when you activate location services or functionalities that use Global Positioning System (GPS) data, namely for Multifactor authentication on your mobile device;
- ✓ Contact details, when you submit a complaint or a compliment to us, when you send us a request by email or directly on the Platform;
- ✓ Service subscription data or purchases of services that you make, or other information related to your Professional Client account with OBRASEGURA;
- ✓ Data for verification, recovery and/or to enable you to be accredited on the Platform;
- ✓ Data about your preferences and activities on the Platform.

When do we collect your data?

1. WEBSITE

On the Website we will collect personal data whenever:

- ✓ Browse our website with all cookie features enabled. [Learn more about our cookie policy here](#);
- ✓ Contact us via the Contact Form.

2. PLATFORM

On the GESTPLANO Platform we will collect personal data at the times identified above and also whenever:

- ✓ Become an OBRASEGURA Professional Client and register your Primary Admin and Secondary Admin resources, as well as your resources, to be managed there;
- ✓ Interacting with OBRASEGURA in the context of a service, activity or other aspect of the professional collaboration relationship maintained;
- ✓ Activate the OBRASEGURA Notifications service or activate other alerts or the Multifactor authentication by mobile devices;
- ✓ Request information, answer questionnaires or give any feedback on the service provided;
- ✓ You have authorized the exchange of data with other companies, such as our partners, for the execution of aspects of the contract with OBRASEGURA (particularly when you have purchased the Commercial module), joint initiatives, requests for quotations or professional collaboration;
- ✓ In cases where your information is publicly available.

What are the grounds for processing your data?

OBRASEGURA will process your personal data on the following grounds:

- ✓ Conclusion and execution of a contract or pre-contract, including to provide, monitor and supervise the execution of services.
- ✓ In the legitimate interest of OBRASEGURA, for example, to prevent fraud, to ensure the security of our network and services, to improve our services, to prove online commercial transactions. Whenever we rely on this legal basis to process your data, we will assess our business interests to ensure that they do not override your rights. Furthermore, in

In certain cases, you have the right to object to this type of processing. For more information see the "[What are your rights](#)" section in this Policy.

- ✓ In compliance with a legal obligation to which OBRASEGURA is bound or which the Professional Clients enforce using the OBRASEGURA Platform, which includes, for example, monitoring compliance with occupational hygiene, safety and health legislation by employees providing services on the premises of OBRASEGURA's Professional Clients.
- ✓ Based on the consent of the owners.

The Platform allows you to manage consents in certain cases (e.g. to manage notifications and warnings). In the event of technical difficulties in executing your consent management instruction, please contact OBRASEGURA Customer Support.

For what purposes does OBRASEGURA collect and process Data?

OBRASEGURA may collect and process Data for the following purposes:

- ✓ Technical or Technical Improvement - In order to enable OBRASEGURA, its partners and subcontractors for the operation and maintenance of the Website and/or the GESTPLANO Platform and for the provision of technical support to the CHANNELS;
- ✓ Commercial (when the Commercial Module is active on the GESTPLANO Platform) - If you have authorized us for this purpose (Commercial Module), we may also contact you to inform you about Partners with resources and availability to provide services or, if applicable, other clients who may have active acquisition/contracting processes that are of interest to you.
- ✓ Usability - To help you find the services that best suit and respond to your needs. To make CHANNELS more relevant and easier to operate and navigate;
- ✓ Notifications and Warnings - For registered Customers by selecting this option on the Platform (if/as available);

As a Professional Client, we want to keep you informed about the services and may send you newsletters or reports, invitations to take part in surveys or notices of interest to you. We will personalize these messages based on the types of services you have purchased from us or the subjects you have indicated are of interest to you. We may personalize information and notices based on how you use our services, your

location or browsing history. If the Customer wishes to stop receiving notifications from OBRASEGURA, they can manage their preferences on their profile page on the Platform. Please note, however, that as a Customer, Customer Admin or other (registered on the Platform) you may continue to receive System notices (e.g. those relating to passwords) and all legal notices (e.g. updates, new versions of policies or terms and conditions).

You can control and manage contacts, notifications and your set of consents at any time. To manage your consents, contact your OBRASEGURA service manager or contact Customer Service.

- ✓ Data analysis and statistics

OBRASEGURA can study large and varied data sets to discover patterns and trends of its Professional Clients and/or Partners and thus improve the service, making it more relevant. We apply demanding processes and adopt rigorous technological measures that ensure that data can be anonymized or de-identified at the appropriate stage of the process prior to any processing.

- ✓ For Fraud Prevention and Security
- ✓ To comply with legal obligations
- ✓ To pursue duly justified legitimate interests.

How does OBRASEGURA protect Customer Data?

OBRASEGURA processes Data in accordance with this Policy and with current European and national legislation, as revised and updated from time to time.

OBRASEGURA has adopted appropriate organizational, technical and procedural measures to protect Data against accidental loss, tampering, unauthorized disclosure or access, or accidental and/or unlawful destruction.

OBRASEGURA CANNOT GUARANTEE THE TOTAL INTEGRATED SECURITY OF THE ENTIRE INTERNET OR THAT THE USE OF PARTICULAR CHANNELS WILL NOT EXPOSE YOU AND YOUR DATA TO THE RISKS OF THEFT, FRAUD OR FRAUDULENT ACTION BY THIRD PARTIES THAT ARE COMPLETELY BEYOND OBRASEGURA'S CONTROL.

ANY OF THESE ACTS CAN CAUSE SERIOUS AND IRREPARABLE DAMAGE AND MAY EVEN BE CARRIED OUT IN A WAY THAT IS NOT IMMEDIATELY NOTICEABLE,

TRACEABLE OR EASILY CONTROLLABLE, WHICH COULD SPREAD THE SPECTRUM OF DAMAGE THAT COULD BE CAUSED.

OBRASEGURA URGES RESPONSIBLE USE OF THE INTERNET AND CAREFUL CONSIDERATION BY CLIENTS IN THE SELECTION AND MANAGEMENT OF INTERNAL CLIENT RESOURCES GRANTED ACCESS AND DATA MANAGEMENT PRIVILEGES ON THE GESTPLANO PLATFORM.

Who do we share your data with?

OBRASEGURA does not deal in Data or data on Data resulting from any *profiling* activity; therefore, the disclosure of Data to third parties is very limited and will only take place in strict compliance with the Law.

With regard to the operation and technical maintenance of the CHANNELS, OBRASEGURA may use third parties to support certain administration and updating activities. Any sharing of Data SHALL BE LIMITED TO THAT STRICTLY NECESSARY for the purposes of the eventual full provision of the service by the third party in question.

Data may be shared with third parties under the following terms:

- ✓ Administrator data for the purposes of guaranteeing the security of the CHANNELS and/or of

OBRASEGURA only uses third-party service providers for data *storage* operations, having contractually guaranteed compliance with terms and conditions compatible with this Policy.

- ✓ OBRASEGURA's commercial partners, according to their own request and/or interest, namely when the Commercial Module is active on the Platform.

In cases where we establish a professional collaboration relationship with a partner organization that is a subcontractor of ours, it will be necessary to exchange information with that entity in order to manage your service and account on the Platform. If our subcontractors have access to your information (for example, for data storage and preservation in a *cloud* infrastructure), we will not authorize that third party to use or disclose your personal information beyond what is strictly necessary for the fulfillment of the subcontract entered into and in force with us or for other legitimate purposes provided for by law.

The processing of your data and information by subcontractors, partners and suppliers contracted by you, even if access to such data and information is through the GESTPLANO Platform, are your responsibility under the processing agreements

data you have with these entities. The terms and conditions of their providers and contractors and their privacy and cookie policies will apply and not this privacy and cookie policy. **OBRASEGURA** will only intervene in any way if this is provided for in the agreement you have directly with us. The access we will give to your information and data from our Platform will only be within the scope of what is strictly necessary to comply with the service contract you have with us.

- ✓ Police authorities, government bodies, regulatory authorities, courts or other public authorities, when we are obliged or authorized to do so under national law. Your personal data will only be made available when we believe in good faith that we are obliged to do so under the law, and after an assessment of all legal requirements;

Unless otherwise required by Law, in the event that any authorities contact OBRASEGURA ordering it to disclose the Client's Data or Confidential Information (1) OBRASEGURA will immediately inform the Client of the existence of such determination/order; (2) it will seek to have the requesting or ordering authorities contact the Client directly and to this end will communicate to them the Client's basic contact details;

(3) OBRASEGURA will make reasonable efforts not to deliver excessive information or information that has not been required; (4) OBRASEGURA will try - to the extent that it is legitimately allowed without associated costs - to prevent any principal/ordering entities from having direct or indirect access to the Client Data; or to the private keys used so that the Client can access reserved areas on the Website or on the Platforms under the control of OBRASEGURA.

OBRASEGURA will endeavor not to disclose System Administrator data to entities outside OBRASEGURA's control except by legal or judicial order.

Where does OBRASEGURA process the Data?

Unless otherwise stated in the other paragraphs of this Policy, Data is only processed within the European Union.

OBRASEGURA complies with European legislation on the protection of personal data with regard to the collection, processing, storage and maintenance of data from citizens of the European Union or citizens whose data is processed within the European Union.

Who is the entity responsible for data processing activities?

Espaço Coordenado Lda. is the Entity Responsible for the Data processing activities and **PTISP** is a subcontractor for the storage of Data associated with the service that runs on the OBRASEGURA Platform in a *cloud* environment.

If the Customer wishes to exercise any of their rights, they should contact OBRASEGURA in writing at:

Espaço Coordenado Lda

**Rua Piteira Santos, 27
2815-752 Sobreda - Almada**

Portugal

Or by e-mail sent using the contact form available at www.gestplano.com.

Data transmission. How does it work?

Without prejudice to the provisions of the following paragraph, OBRASEGURA shall not disclose Client Data or confidential information outside the territory of the European Union or to entities outside OBRASEGURA's control, except (1) if the Client permits or otherwise directs OBRASEGURA to do so; or (2) if required by Law; or (3) imposed by a judicial order or determination or that of an official or public authority with jurisdiction over OBRASEGURA.

We may use subcontractors to process all or part of your personal data, under the terms permitted by law. These entities are obliged, under the terms of the contracts entered into, to keep confidential and guarantee the security of your data to which they have access for this purpose, and may not use this data for any other purpose or relate it to other data they hold. If, in this context, we have to send your information to a country that is not in the European Economic Area, we will ensure that all the necessary security measures are complied with, as well as that these transfers take place under standard contractual clauses approved by the European Commission.

How long do we keep your data?

We will store your information for the longest of the following periods:

- ✓ For the duration of the professional collaboration relationship;
- ✓ For the entire period set for the safekeeping and conservation of documents and information (particularly accounting and financial information)
- ✓ By the general limitation period for obligations defined in civil law;
- ✓ For the duration of the purpose for which the processing was carried out and/or for any other period required by law.

Security of your data when browsing the Internet.

Internet-based communications (such as emails) are only considered secure if they are encrypted. OBRASEGURA guarantees encryption when sending messages for multifactor authentication for use of the GESTPLANO Platform.

The Customer and users (in general) are responsible for maintaining the security of their personal and account information and for not sharing access keys or user credentials for the GESTPLANO Platform with other people.

Our website may contain links to third-party websites. We cannot be held responsible for the security and content of such third party websites. You should ensure that you read the privacy and cookie policies of those sites before using or transferring any personal information to them.

The website does not contain social

plug-ins. **What are your rights?**

✓ **Right of access and rectification of personal data**

You have the right to access your data and demand that it be rectified if it is inaccurate or has changed.

✓ **Right to data portability**

You have the right, under certain circumstances and with technical limitations, to receive the data you have provided to us for the service of the GESTPLANO Platform.

✓ **Right to object to the processing of personal data**

You have the right to object to the processing of personal data concerning you where the exercise of that right does not conflict with the need to comply with a legal obligation, our duly justified legitimate interest or our obligation to comply with the contract that exists with us.

✓ **Right to complain**

OBRASEGURA has a team at your disposal to answer any questions you may have.

The right to complain can be exercised with the national data protection authority, the CNPD - Comissão Nacional de Proteção de Dados (National Data Protection Commission), whose contact details can be found at www.cnpd.pt.

✓ **Right to limit the processing of your data**

If you believe that your data is being used excessively, illegitimately or incorrectly, or if you believe that we should not process it, you should contact our team.

In certain circumstances, you will have the right to ask us to limit the use of your data, as long as this does not conflict with the service you have contracted from us and which we have to make available on the Platform. If this is the case, in order to comply with your request, the service on the Platform may have to be limited, deactivated or inaccessible until the matter is resolved.

✓ **Right to elimination**

If you think that we are keeping your data for longer than is necessary, you should first check whether your contract has ended. If this is the case, however, we may have a specific legitimacy to continue processing your data. If you have any doubts, please contact us and we will delete your data immediately if we find that we are inadvertently processing your data unjustifiably.

Which laws and jurisdiction apply?

Customer Data will be processed by the Processor only in accordance with the provisions of this Policy, with the provisions of Portuguese Law and with the provisions of European legislation duly transposed or directly applicable to Portuguese territory. No other laws shall apply to Customer Data and/or confidential information.

Any disputes shall be submitted to and resolved exclusively by the Portuguese courts, whose territorial and material jurisdiction shall be determined using the (procedural) laws in force.

Revised version in force since March 7, 2022.

