



PERSONAL DATA PRIVACY POLICY

Hardsecure - Segurança em Sistemas de Informação

Rua Acácio de Paiva, nº16, 1ºdir 1700-006, Lisboa, Portugal

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1. SCOPE AND LEGAL FRAMEWORK

In the context of its established business and contractual relationships, Hardsecure, in the context of the provision of its services, needs to collect some personal data from customers, suppliers, candidates for recruitment processes, partners and other natural persons who may send communications to the email address available on the website ("hereinafter" data subjects").

On the other hand, the increasingly frequent interaction with users of the www.hardsecure.com website (hereinafter "**site**"), also requires, in some cases, (i) the collection of personal information so that you can use certain content and features made available on the site and (ii) the collection of your device (through files called *cookies*), to improve the performance and navigability of the site. www.hardsecure.com

In this sense, this Privacy Policy aims to inform you what personal data we collect, how and why we use it, to whom we disclose it and how we protect the privacy of data subjects.

2. WHY?

Hardsecure is committed to protecting the security and privacy of data subjects. In this context, we have developed this Privacy Policy in order to affirm our commitment and respect for the rules of privacy and protection of personal data.

We want data subjects to know our general privacy rules and the terms of processing of the data we collect, in strict compliance with and compliance with applicable legislation in this regard, including Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 ("General Data Protection Regulation").

Hardsecure seeks to respect the appropriate practices regarding the security and protection of personal data, promoting actions and improving systems in order to protect the protection of the data provided by data subjects.

The use and navigation of the website, the completion of our form and the provision of data directly or indirectly by the data subjects, imply the knowledge and acceptance of the conditions of this Policy and any other specific terms, policies and conditions relating to the relationship established. By making your personal data available, you consent to their collection, processing, use and disclosure in accordance with the rules set out herein.

3. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

The references in this Privacy Policy to Hardsecure mean Hardsecure – Sociedade Unipessoal, Lda (company registered in Portugal, based in Rua Acácio de Paiva, no. 16 – 1º Dt.º, 1700-006 Lisboa, NIPC 509 877 877), and for this purpose being considered the entity responsible for the processing of the data, in accordance with the General Data Protection Regulation.

4. WHAT IS PERSONAL DATA?

Personal data means any information of any nature and regardless of its support, including sound and image, relating to an identified or identifiable natural person (data subject). A person who can be identified directly or indirectly, in particular by reference to an identification number or other specific elements of his physical, physiological, psychological, economic, cultural or social identity, shall be considered identifiable.

5. WHAT PERSONAL DATA DO WE COLLECT?

We collect and process your personal data necessary for the purposes of providing our services and managing our contractual relationships.

We may also receive your personal data from our partners or third parties acting on our behalf.

For more information on sharing your data with other entities, see the section "UNDER WHAT CIRCUMSTANCES IS THERE DATA COMMUNICATION TO OTHER ENTITIES?" below.

Categories of personal data we process:

Personal Data	When they are collected/treated
Communications you exchange with us (e.g. your emails, letters or calls) with requests for contact and clarification, submission of complaints, comments or suggestions	When you contact us or are contacted by us
Your name, address and contact details, taxpayer number and civil identification number	When we formalize the contractual relationship
Your name, email address and phone number	When you fill out the form to contact or be contacted by us, available on the
Your images and photos	When you participate in our events, in the initiatives to promote our services, webinars and workshops
Your opinion of us	When you send us communications, complaints, suggestions, and complaints to the site
Information about how you use our website	When you use the website, in accordance with the Privacy Policies and Cookies of the

Special categories of personal data

As part of our activities, we may collect information that may reveal data relating to health, biometric data, your racial or ethnic origin, political opinions, religious or philosophical beliefs.

Such information is considered "special categories of data", in accordance with the General Data Protection Regulation, and all requirements of the General Data Protection Regulation will be respected.

6. WHAT ARE THE PURPOSES OF COLLECTING YOUR PERSONAL DATA?

Hardsecure's mission is to define and implement public and private interest policies, with the objective of *implementing innovative frameworks and* methodologies of added value in the areas of Security and Cybersecurity, in order to ensure the increase of productivity in a safe and sustained way for customers, partners, etc.

In this assumption, the personal data of the data subjects are used in the context of the provision and management of the contracted services, of the contractual relationship established.

Personal data collected directly or through the website are processed specifically for the purpose of allowing users to use the features of the website, in order to allow, inter alia, Hardsecure's response to requests for information and contact submitted by users.

The most detailed information about the processing of your data within the scope of the website is contained in the Privacy and Cookies Policies available on the website.

The personal data collected will be processed in the terms and for the purposes described herein, as well as, in certain cases, for the fulfilment of our legal obligations.

In this sense, we use your personal data for the following purposes:

- **To provide our services**

When the company to which you collaborate requests the provision of our services, we use your above information to provide our consulting services;

- **To communicate and manage our relationship with you**

From time to time, we may contact you by email and/or sms for administrative or operational reasons, for example, in order to send you information regarding the services contracted by the company to which you collaborate or to provide you with information about your contractual relationship with us.

- **To improve our services and meet our administrative and business objectives**

Business objectives for which we may use your information include accounting, billing and auditing, fraud analysis, security, legal and procedural effects.

- To comply with our legal obligations

In particular, the obligation to provide your personal data to administrative and governmental entities competent under the law.

7. WHAT IS THE PERIOD OF RETENTION OF YOUR PERSONAL DATA?

Your personal data necessary for the purposes described above will be retained for the period in which your relationship with Hardsecure is in force, and may be kept for a longer period, established by law or for the defense of law/interest in legal proceedings.

8. WHAT ARE THE RIGHTS OF DATA SUBJECTS?

As provided by law, you may at any time access your rights in relation to personal data concerning you:

- **Right of rectification**– means that you have the right to obtain from Hardsecure the rectification of inaccurate personal data concerning you, as well as the right to have your personal data incomplete and completed;
- ✓ **Right to delete your data**– means that you have the right to request the payment of your data in certain cases, including, but not limited to, personal data which are no longer necessary for the purpose of collecting or processing, on which you withdraw the consent on which the processing of the data is based, among others;
- ✓ **Right of data portability**– means that in certain cases it may require personal data concerning you and that you have provided Hardsecure in a structured, commonly used and machine-readable format and the right to transmit that data to another controller;
- ✓ **Right to limitation of treatment**– means that you have the right to request the limitation of the processing of your data in certain cases, in particular as a counterpart if the processing is unlawful and opposes the erasure of your data, Hardsecure no longer needs personal data for processing purposes, but it is

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required by you for the purposes of the declaration, exercise or defense of a right in a judicial process , among others;

- **Right of opposition**– may be owe the processing of your data for reasons relating to your particular situation in cases where the data are processed (i) for the purposes of the legitimate interests pursued by Hardsecure or third parties, or are processed for purposes other than those for which the data were collected and is not carried out with the consent of the data subject or based on provisions of Union or Member State law , or (ii) personal data are processed for direct marketing purposes, including profiling or (iii) personal data are processed for scientific or historical research purposes for statistical purposes.

You may exercise these rights directly by written request, addressed to Hardsecure, [to the address dpo@hardsecure.com](mailto:dpo@hardsecure.com) or to the address Rua Acácio de Paiva, no. 16, 1º Dt.º, 1700-006 Lisboa.

Under the law, you are also guaranteed the right, by the means referred to above, to withdraw your consent to the processing of data whose consent constitutes the basis of the legitimacy of the processing. To this end, you have the right to withdraw your consent at any time, which does not invalidate, however, the processing carried out up to that date on the basis of the consent previously given.

Without prejudice to any other administrative or judicial appeal, the data subject shall be entitled to lodge a complaint with the National Data Protection Commission or other competent supervisory authority in accordance with the law if he considers that his data is not being processed legitimately by Hardsecure in accordance with applicable law and this Policy.

The request for assistance shall be accompanied by proof of the identity of the applicant and, where different persons, the identity of the data subject and the powers of representation. Consent is also required to process your identification data and a personal contact for notification purposes under this procedure.

Hardsecure will respond to your request within one month of the exercise of the right, and in case of manifest complexity, the period may be extended, up to two months.

9. WHAT SECURITY MEASURES HAVE HARDSECURE ADOPTED?

Hardsecure makes every effort to protect customers' personal data from unauthorized access over the Internet. To this end, it maintains all technical means at its fingertips to prevent the loss, misuse, alteration, unauthorized access, disclosure, loss or destruction and misappropriation of personal data provided or transmitted, committing to comply with the legislation on the protection of personal data provided or transmitted, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation relating to the protection of personal data and to treat this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data and to process this data only for the purposes for which it was collected, committing to comply with the legislation on the protection of personal data , as well as ensuring that this data is treated with adequate levels of security and confidentiality.

We also inform you that our website is encrypted by a Security Certificate, so the data sent between our server and the user is secure.

It is, however, the responsibility of the data subject to ensure and ensure that the computer you are using is adequately protected against harmful software, computer viruses and *worms*. In addition, you should be aware that without the adoption of appropriate security measures (e.g., the secure configuration of the navigation program, up-to-date antivirus software, security barrier software and the use of software of dubious origin), the risk of personal data and passwords being accessed by third parties, without authorization to do so, is aggravated.

However, it should be noted that whenever data collection is carried out on open networks, such as the internet, your data may circulate without security conditions, and there is a risk of being seen and used by unauthorized third parties.

As described in this Privacy Policy, we may in some cases transmit your personal data to third parties.

Hardsecure has established clear rules for contractualising the processing of personal data with its subcontractors, and requires them to take appropriate technical and organizational measures to protect your personal data. However, in some cases, we

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may be required by law to disclose your personal data to third parties (such as supervisory authorities or judicial authorities) for whom we have limited control over the protection of personal data.

10. UNDER WHAT CIRCUMSTANCES IS THERE DATA COMMUNICATION TO OTHER ENTITIES?

Hardsecure uses other entities to provide certain services. If necessary, such provision of services may imply access by these entities to personal data of data subjects.

Accordingly, any Hardsecure subcontractor processes the personal data of the data subjects, on behalf of and on behalf of Hardsecure, under our strict obligation to follow our instructions. Hardsecure shall ensure that such subcontracting entities provide sufficient guarantees for the implementation of appropriate technical and organizational measures in such a way that the processing meets the requirements of applicable law and ensures the security and protection of the rights of data subjects in accordance with the subcontracting agreement concluded with those subcontracting entities.

In certain situations, your personal data may also be transmitted to third parties where such data communications are necessary or appropriate (i) in the light of applicable law, (ii) in compliance with legal obligations/court orders, (iii) by determination of the National Data Protection Commission or other competent supervisory authority, or (iv) to respond to requests from public or governmental authorities.

In any of the above situations, Hardsecure undertakes to take all reasonable steps to ensure the effective protection of the personal data it treats.

11. INTERNATIONAL DATA TRANSFERS

The provision/provision of services by Hardsecure may involve the transfer of personal data of data subjects to third countries (which do not belong to the European Union or the European Economic Area).

In such cases, Hardsecure shall implement the necessary and appropriate measures in the light of applicable law to ensure the protection of personal data subject to such transfer, strictly complying with the legal provisions regarding the requirements applicable to such transfers, including informing you in this context.

12. CONTACT US

You may contact Hardsecure for more information on the processing of your personal data, as well as any questions relating to the exercise of the rights assigned to you by applicable law and, in particular, those referred to in this Policy, through the following contacts:

Phone: 218 278 126

Address: Rua Acácio de Paiva, no. 16 - 1º Dt.º. 1700-006 Lisbon

E-mail: dpo@hardsecure.com

13. HOW CAN YOU GET TO KNOW CHANGES TO OUR PRIVACY POLICY?

We may change this Privacy Policy at any time.

These changes will be properly advertised on [the www.hardsecure.com](http://www.hardsecure.com) website and, if they imply a substantial change in the way your data is processed, you will be notified through the contact details you have made available to us.

Lisbon, September 30th 2020