



# PERSONAL DATA PROTECTION POLICY

- *DIGI PT website and mobile application* -

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## 1. INTRODUCTION

### 1.1. Objectives of this Personal Data Protection Policy

The present **Personal Data Protection Policy** (hereinafter referred to as "Policy") of **DIGI PORTUGAL, LDA**, registered in the Commercial Registry Office of Lisbon under number 516222201 (hereinafter referred to as "DIGI"), aims to inform Customers/Users of the general rules on the treatment of personal data, which are collected and processed in the context of the **DIGI's website and mobile application**, in strict respect and compliance with the provisions of the personal data protection legislation in force at each moment, namely **Regulation (EU) 2016/679** of the European Parliament and of the Council, of 27 April 2016 ("GDPR") and the **Law n.º 58/2019, of 8 August**, national law implementing the GDPR.

The [www.digi.pt](http://www.digi.pt) website (and the mobile application version, if available, hereinafter referred to as the "App") is provided and administered by DIGI, part of the Digi Group.

We collect and process various categories of personal data from you as a user of the website [www.digi.pt](http://www.digi.pt) (hereinafter referred to as the "Website"), which in accordance with European Union legislation on the protection of personal data, makes us a personal data controller.

The protection of your personal data is very important to us. This Privacy describes our practices regarding our collection and use of your personal data as a result of your interaction with the Website or the App.

The rules set in this Policy complement, when applicable, the provisions on personal data protection and processing set forth in the contracts that Clients/Users sign with DIGI, as well as the rules set forth in the terms and conditions that regulate the offer of the various products and services and that are duly advertised on the respective website(s).

All information contained in and collected via DIGI's digital channels, as well as all data and information compiled by DIGI in connection therewith (such as data files, written text, software, audio files or images) to which you have access through access to DIGI's digital channels and/or the services provided by DIGI, are considered DIGI content.

This Policy is also applicable to candidates for positions at DIGI, who submit their respective applications, namely via DIGI's digital channels, under the terms indicated in this Policy Section 4.

We inform you that, whenever manifested as necessary, we will amend this Policy, being the new version available in our communication channel(s).

## 1.2. What personal data we process about you

- **When you use the Website:** Certain data and information is collected including IP (internet protocol) address, general location of the device used to access the Website (city level), operating system of the device, browser type, date and time of access, link of the page accessed, viewing history of the Website pages, device information (manufacturer, model, screen resolution), device id (notifications and identification) and requests and actions taken on the Website.

We use this information to help us design our Website to suit the needs of our users. We may also use the IP address to help diagnose problems with our servers and to administer the Website, to analyze traffic trends, to compile statistics about visitors' interactions with the Website, and to compile statistics about broad demographic information to help us identify visitor preferences based on the geographic areas from which they access the Website.

The basis for the processing is compliance with the Website terms of use, our legitimate interest in monitoring activity on the Website, to produce certain statistics relating to its use and to ensure the security of the Website.

In addition, the legal basis for the processing is also the legitimate DIGI's interest to defend its rights and to respond to any complaints and/or requests from Customers/Users.

- **When you subscribe to receive our newsletter:** when you subscribe to receive our newsletter we will process your email address for this purpose in order to send you messages.

The legal basis for the processing is your consent. We ensure that you have a simple option to unsubscribe at any time, either in the communication itself or by contacting us as indicated below. When you unsubscribe, the newsletter communication ceases.

The e-mail address can be shared with the provider of the e-mail newsletter sending solution (situation where data is not transferred outside the European Union).

- **When using the App:** Certain data and information is collected including IP address, general location of the mobile device (city level), mobile device model, operating system, time of access, page link accessed, page view history in the App, articles viewed, video stream view, device id (notifications and identification) and/or other actions performed in the App.

We use this information to help us design the App to better suit the needs of our users. We may also use information about your device to help diagnose problems with our servers

and/or the App, to analyze trends, to compile statistics about visitor interactions with the App, and to compile statistics about broad demographic information to help us identify user preferences based on the areas from which they use the App.

The basis for the processing is compliance with the APP terms of use, our legitimate interest in monitoring activity on the App, to produce certain statistics relating to its use and to ensure its security.

In addition, the legal basis for the processing is also the legitimate DIGI's interest to defend its rights and to respond to any complaints and/or requests from Customers/Users.

**- When you subscribe to receive our notifications -** we will process your phone identifier to send push notifications.

The legal basis for the processing is your consent. We ensure that you have a simple option to unsubscribe at any time via the settings in the App. When you unsubscribe, the transmission of notifications will cease.

Your phone ID will be shared with the push notification solution provider on your mobile device.

Data is stored until consent is withdrawn.

### **1.3. Personal Data Controller**

DIGI is responsible for the processing of your personal data, within the meaning of the GDPR, as long as and to the extent that it determines the purposes and means of processing such data.

## **2. SOME RELEVANT CONCEPTS**

### **2.1. What are Personal Data?**

Personal data is any information of any nature whatsoever, irrespective of the medium used, including sound and image, concerning an identified or identifiable natural person.

An identifiable natural person is 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 to one or more factors specific to that natural person's physical, physiological, genetic, mental, economic, cultural or social identity.

## **2.2. What does the Processing of Personal Data comprise?**

The processing of personal data consists of an operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, namely collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, comparison, interconnection, restriction, erasure or destruction.

DIGI respects best practices in the field of security and protection of personal data, and to this end has taken the necessary technical and organizational measures to comply with the GDPR and to ensure that the processing of personal data is lawful, fair, transparent and limited to the authorized purposes.

## **2.3. What are the types of personal data processed?**

DIGI, within the scope of its activities, processes personal data necessary for the provision of services and/or supply of products, as well as for sending newsletters and surveys, processing data such as name, identification data, address, telephone number and email address, as per more detailed information made available to the owners of personal data.

Without prejudice to compliance with legal regulations regarding the storage and transmission of data for the purpose of investigation, detection and prosecution of serious crimes, as well as other processing to which it is legally obliged, traffic, geographical location, profile and or consumption data of clients/users will be processed by DIGI, insofar as they are necessary for the respective provision of services. Thus, based on location, profile and/or consumption, Customers/Users will have access to specific service features, content suggestions and proximity information services.

Location information may also be recorded and transmitted to organizations with legal powers to receive emergency calls for the purpose of responding to incoming calls.

Personal, traffic, geographic location, profile and/or usage data is also processed for marketing purposes or for advertising offers of DIGI goods and services, if the data subject has consented. These communications are intended to provide information on news, promotions, campaigns and other opportunities.

If there is prior consent of the Customers/Users, the consent may be withdrawn at any time, without, however, the lawfulness of the processing carried out on the basis of the consent previously given being compromised.

**2.4. In what circumstances is there communication of data to other entities (third parties and subcontractors)?**

DIGI, as part of its activity, may use third parties to provide certain services. Sometimes, the provision of these services implies access, by these entities, to Customers/Users' personal data. When this happens, DIGI takes the appropriate measures in order to ensure that the entities which have access to the data are reputable and offer the highest guarantees at this level, which is duly established and safeguarded contractually between DIGI and the third party(ies).

Thus, any entity subcontracted by DIGI shall process the personal data of our customers/users on behalf of DIGI and by adopting the necessary technical and organizational measures in order to protect personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access, and against any other form of unlawful processing.

The provision of certain services by DIGI may involve the transfer of your data outside of Portugal, including outside the European Union or to International Organizations.

In such a case, DIGI will strictly comply with the applicable legal provisions, namely as regards determining the suitability of the destination country(ies) as regards the protection of personal data and the requirements applicable to such transfers, including, where applicable, the conclusion of appropriate contractual instruments that guarantee and respect the legal requirements in force.

In any case, DIGI remains responsible for the personal data made available to it.

DIGI may also communicate the personal data of Clients/Users in order to comply with legal obligations, namely to police, judicial, fiscal and regulatory bodies.

**2.5. For how long we keep your personal data?**

The period of time for which personal data is stored and retained varies according to the purpose for which the information is processed.

Whenever there is no specific legal requirement that determines the conservation of data for a specific period, the data will be stored and conserved only for the minimum period necessary for the pursuit of the purposes that motivated their collection or their subsequent processing, under the terms defined by law.

## 2.6. Contacts for marketing purposes

DIGI may promote actions of dissemination to its customers/users of new products or services via phone, email, SMS, MMS or any other service and means, if the holder of personal data (natural person) has given their consent.

Should the data subject not wish to continue receiving these communications, the data subject may, at any time, withdraw his/her consent for the use of his/her data for marketing purposes.

## 3. THE RIGHTS OF DATA SUBJECTS

With regard to the respective Personal Data, the data subjects have the following rights:

- **Right of access** - right to obtain from DIGI confirmation as to whether or not personal data concerning you are being processed, to access your personal data held by DIGI and to obtain a copy of the data being processed.
- **Right of rectification** - right to obtain, without undue delay, the rectification of inaccurate or incomplete data. In this context, Customers/Users must ensure that changes to their personal data are communicated to DIGI, so that it can ensure the permanent updating of data.
- **Right to erasure ("right to be forgotten")** - right to obtain the erasure of your data in certain cases, in particular if the data are no longer necessary for the purpose for which they were collected or processed; if you withdraw consent and there are no other grounds for processing your personal data; and if you object to the processing and there are no overriding legitimate interests justifying the retention of the data (such as for billing and/or tax purposes).
- **Right to restriction of processing** - right to obtain restriction of processing of your data in certain cases, in particular where DIGI no longer needs the data for processing purposes, but the data is required by customers/users for the purposes of asserting, exercising, or defending a right in legal proceedings; where customers/users contest the accuracy of the data, for a period allowing DIGI to verify its accuracy; and where customers/users object to the processing, pending verification that DIGI's legitimate grounds prevail.
- **Right to data portability** - if processing is based on the execution of a contract or on consent and is carried out by automated means, Customers/Users have the right to



receive their personal data in a structured, commonly used and machine-readable format and, whenever possible, in an open format.

- **Revocation of consent** - in cases where the treatment is based on consent, Clients/Users have the right to revoke their consent. The revocation of consent does not compromise the lawfulness of the treatment carried out on the basis of the consent previously given.
- **Right to object to processing** - in cases where DIGI claims a legitimate interest in processing their data, Customers/Users may object at any time to the processing of their personal data, in particular where the processing is carried out for the purposes of the legitimate interests pursued by DIGI. In such cases, DIGI will stop the processing, unless it demonstrates a legitimate interest which overrides the rights, interests and freedoms of the data subject or the data is necessary for the establishment, exercise or defense of legal claims.

The data subjects can exercise the above rights by writing to the contact details set out in this Policy Section 7.

#### **4. RECRUITMENT PROCEDURES / SPONTANEOUS APPLICATIONS**

In accordance with the legislation in force, we inform you that whenever you send us your CV as part of a recruitment process or a spontaneous application ("selection process"), namely through DIGI's digital channels, your data will be processed by DIGI, as the Data Controller.

Both the personal data you provide in your CV, and those you may provide during the selection process, will be processed to assess and manage your application and, where appropriate, to carry out the necessary actions for the selection and hiring of you and, unless otherwise stated, will be used to communicate future vacancies at DIGI that match your profile and which may be of interest to you.

Such data may be provided to selection/consulting companies, which, if applicable, are collaborating with DIGI in the selection process.

#### **5. HOW WE USE "COOKIES"**

"Cookies" are small software tags that are stored on your computer by your browser, retaining only preference-related information and as such do not include personal data.

Cookies are used to help determine the usefulness, interest and number of uses of websites, allowing faster and more efficient browsing by eliminating the need to repeatedly enter the same information.

All browsers allow Customers/Users, as users, to accept, refuse or delete cookies, and also to inform them whenever a cookie is received, namely by selecting the appropriate settings in their browser. Users can configure cookies in the "options" or "preferences" menu of their browser.

It should be noted, however, that disabling cookies may prevent some web services from working properly, affecting navigation on the website in part or in full.

## **6. APPLICABLE LAW AND JURISDICTION**

For the resolution of any legal issues arising from the present Policy, Portuguese law and the Court of the Judicial District of Lisbon shall have exclusive competence.

## **7. CONTACTS**

If you wish to exercise any of your rights in relation to the processing of your data or to contact us with any questions concerning this Policy or matters of data protection, please contact us:

- E-mail: [juridico@digipt.pt](mailto:juridico@digipt.pt)

Without prejudice to being able to submit complaints directly to DIGI, through the contacts made available for this purpose, the data subjects may complain directly to the Control Authority, which is the National Commission for Data Protection ([www.cnpd.pt](http://www.cnpd.pt)), if he/she considers that the processing of his/her personal data violates the applicable legislation.