



# Privacy Policy

## PREAMBLE

The present Personal Data Protection Policy, hereinafter "Policy" intends to inform you about the following points :

1 - The commitments adopted by SWIFTSOLUTION SERVICES, S.A., regarding the Protection of Personal Data, under the terms and in accordance with Regulation (EU) 2016/679, on the protection of individuals with regard to the processing of Personal Data and the free movement of such data. These commitments are adopted on the basis of the General Data Protection Regulation, hereinafter "RGPD";  
and

2 - About the way in which SWIFTSOLUTION SERVICES, S.A., treats your Personal Data, in particular the Personal Data obtained in a digital way, namely, through websites, social networks, applications or any other platforms.

## DEFINITIONS

«**Personal Data**» - is any information related to the Data Holder and that allows him to identify himself.

«**Holder of the Data**» - any identified or identifiable individual to whom the Personal Data are associated. The individual may be identifiable or identified, directly or indirectly, namely, through name, civil or fiscal identification number, location data, online identifiers (such as IP addresses and logs). Identification can also be made through physical, physiological, genetic, mental, economic, cultural or social identity factors. The user of the website, applications and digital platforms considers himself as Data Holder in relation to SWIFTSOLUTION SERVICES, S.A..

«**Controller**» - internal entity of SWIFTSOLUTION SERVICES, S.A., which defines the objectives and means of Personal Data Processing.

«**Subcontractor**» - an entity external to SWIFTSOLUTION SERVICES, S.A., which processes Personal Data on behalf of the latter.

«**Processing**» - any operation carried out within the scope of the Personal Data, through automatic means or not, such as collection, recording, organization, structuring, storage, adaptation or alteration, recovery, consultation, use, disclosure by transmission, dissemination or, alternatively, availability, harmonization or association, restriction, elimination or destruction. Processing of Personal Data is also considered any other operation envisaged under the RGPD.

## 2. WHAT ARE SWIFTSOLUTION SERVICES, S.A.'S COMMITMENTS REGARDING THE PROTECTION OF PERSONAL DATA?

A SWIFTSOLUTION SERVICES, S.A., guarantees the complete protection of Personal Data in accordance with the RGPD rules, with regard to all the procedures and obligations provided therein, especially with regard to the Processing of Personal Data of users of websites, applications and digital platforms (e.g.: visitors, customers, potential customers, etc.).

### PERSONAL DATA PROTECTION OFFICER

A personal data protection officer has been implemented internally, who is responsible for ensuring compliance and adaptation to RGPD standards.

The Personal Data Protection Officer, in accordance with the RGPD and the internal policies adopted by SWIFTSOLUTION SERVICES, S.A., is responsible for informing and advising on the requirements and applicable, as well as for monitoring the compliance of these requirements and the way Ceetrus operates, cooperating and acting as preferential contact with the competent Supervisory Authorities.

### COMPLIANCE PROGRAM FOR THE PROTECTION OF PERSONAL DATA

A SWIFTSOLUTION SERVICES, S.A., has developed and implemented tools and procedures with the objective of guaranteeing the effective protection of Personal Data.

A SWIFTSOLUTION SERVICES, S.A., has adopted and implemented several internal policies and procedures in order to raise the awareness of its employees, suppliers and partners regarding the protection of Personal Data, providing them with training and operational guidance regarding the fulfillment of the RGPD, always following the conformity of these procedures.

A SWIFTSOLUTION SERVICES, S.A., has implemented internally a specific training program with the objective of sensitizing and training all its employees regarding these matters.

### PRINCIPLES OF PERSONAL DATA PROTECTION

#### Processing of Personal Data

SWIFTSOLUTION SERVICES, S.A., undertakes to treat your Personal Data in accordance with the following principles:

- Your Personal Data are processed legally, impartially and transparently, thus guaranteeing the principles of legality, impartiality and transparency;
- Your Personal Data are collected and processed for specific, explicit and legitimate purposes, and are not processed in a way that diverges from and is incompatible with the purposes for which they were collected, thus guaranteeing the principle of purpose limitation;
- Your Personal Data are collected and kept adequate, relevant and limited to what is strictly necessary.

### **Treatment Safety**

SWIFTSOLUTION SERVICES, SA, has defined technical and procedural measures with a view to the effective implementation of the principles of protection of Personal Data, in order to comply with the GDPR, thus protecting the rights, freedoms and guarantees of the Personal Data Holders, from the beginning collection and consequent treatment

SWIFTSOLUTION SERVICES, S.A., determined the imposition of the same level of protection of Personal Data on all Subcontractors (service providers, suppliers, partners, etc.) through the inclusion in the contracts of specific clauses for this purpose.

### **HOW DOES SWIFTSOLUTION SERVICES, S.A., COLLECT YOUR PERSONAL DATA?**

Through the collection carried out in the commercial establishments that it operates and through its websites, applications and digital platforms in which the user makes available and consents to the respective collection.

Thus, it is possible for SWIFTSOLUTION SERVICES, S.A., to collect your Personal Data through the following means:

- When you create a registration / account on one of your websites, applications or digital platforms;
- When browsing the websites, applications or digital platforms of SWIFTSOLUTION SERVICES, S.A., (that is, technical information, such as IP addresses or logs, collected through cookies or similar technologies when authorized);
- When you register online;
- When you subscribe to the newsletter provided by Nhood;
- When participating in a contest, marketing program, test or survey;
- In commercial establishments / projects where you provide services;
- When introducing comments or images on the social media pages owned by SWIFTSOLUTION SERVICES, S.A.;
- When, in any other way, you send us personal information and consent to its storage and treatment;

### **WHY DOES SWIFTSOLUTION SERVICES, S.A., NEED TO COLLECT YOUR PERSONAL DATA?**

SWIFTSOLUTION SERVICES, S.A., collects your Personal Data according to the following purposes:

### **Customer Relationship Management**

SWIFTSOLUTION SERVICES, S.A., collects Personal Data regarding business relationships with customers and potential customers and, in particular:

- To allow you to browse the websites, applications and digital platforms of SWIFTSOLUTION SERVICES, S.A., using your personal online account;
- To obtain your opinion on services and / or events, in particular through surveys and tests;
- To allow you to participate in contests, questionnaires or other marketing programs;
- To establish statistical analyzes, financial and commercial studies and for the purposes of online traffic management (eg: to obtain the levels of use of the SWIFTSOLUTION SERVICES, SA website, applications and digital platforms, as well as the relevance of the services available as a way to improve their usability);
- To send information or promotional communication and advertising from SWIFTSOLUTION SERVICES, SA, and / or other companies, in particular about campaigns and events that may interest the customer, provided that (subject to prior authorization, when necessary and respecting your right of refusal, in accordance with the legal requirements applicable to direct marketing for commercial purposes).

These notifications can be sent by email or postal or via mobile service (phone call, SMS and MMS).

### **Fighting fraud**

Your Personal Data will be treated in order to prevent fraud from third parties.

Information considered mandatory is marked with an asterisk in the online forms available by SWIFTSOLUTION SERVICES, S.A., Without this information, user registration cannot be processed. The provision of the remaining information is optional.

### **LEGAL BASIS OF PROCESSING**

The treatment operations carried out in relation to the Personal Data of customers by SWIFTSOLUTION SERVICES, S.A., are based on:

- In their legitimate interest in achieving sales, protecting their activities, products and services, as well as in better identifying their customers' preferences as a way to personalize offers and highlight articles, products and / or services that best match their needs;
- When the Treatment is required by the legislation in force;
- When explicit consent is acquired.

### **HOW LONG DO SWIFTSOLUTION SERVICES, S.A., KEEP YOUR PERSONAL DATA?**

SWIFTSOLUTION SERVICES, S.A., maintains its Personal Data according to the periods of conservation imposed by the legislation and regulations in force, namely taking into account its activities.

SWIFTSOLUTION SERVICES, S.A., may store your Personal Data during the following periods:

- When you contact us to request information, we keep your personal data for the time necessary to process and complete your request;
- We keep your personal data used for direct marketing until you cancel the authorization or ask us to delete it, in accordance with the legislation in force. In that case, SWIFTSOLUTION SERVICES, S.A., will only preserve the information necessary to guarantee its right of opposition in accordance with legal regulations and standards.

The cookies used by SWIFTSOLUTION SERVICES, S.A., are stored until the user removes them from their browser.

#### **WHO ARE THE RECEIVERS OF YOUR PERSONAL DATA?**

SWIFTSOLUTION SERVICES, S.A. employees, responsible for the management of Customer Support, Marketing Management and Information Technologies can only access your Personal Data for strict need.

#### **ABOUT COOKIES**

##### **What are cookies?**

Web sites, applications and digital platforms may use cookies or similar technologies to enhance your browsing experience. Cookies constitute information stored on your personal equipment about the sites you visit. Sometimes they are stored in a simple text file, accessed by a server that reads and records the information.

Sites can only read and write cookies held by them.

##### **Our use of cookies**

When you browse our sites, we use cookies to "recognize" your browser, only during your visit ("session cookie") or during all your visits ("permanent cookie"). On our site, cookies are used for the following purposes:

- For technical reasons (identifying sessions, maintaining settings or shopping carts, etc.) to, for example, adapt the presentation of the website, application or digital platform to your device;
- For statistical analysis and online traffic management purposes, for example, to improve the usability of a website, application and digital platform and the relevance of our services;
- To redefine your target audience and provide you with marketing content on other websites;
- For geolocation purposes when using specific functions, such as recommendations for store addresses and products available at the nearest point of sale.

##### **Other cookies**

##### **Third Party Cookies**

If authorized in your cookie settings (see the cookie settings section below), third parties (advertising agencies, internet analytics companies, etc.) will set/read cookies when you browse our website, applications and digital platforms.

The use of these cookies is governed by our privacy policies.

These cookies are used by these companies, throughout the life of the cookies, to determine and distribute relevant advertising content, reflecting their primary interests based on their knowledge of your browsing habits on our website, applications and digital platforms.

##### **Social networks**

To allow you to share content or comments about our products and/or services, our website, applications and digital platforms may include social networking components (buttons, plug-ins, etc.).

These components are used by social networks to record your browsing habits and will only work if your browser is connected to the social network in question (but you don't have to have used the "share" button, for example).

The social networks you use determine the terms governing their use of the information they obtain and SWIFTSOLUTION SERVICES, S.A. has no control over the use of this information.

We recommend that you consult the respective privacy policies, which will specify how you use this data and the actions you can take to increase account confidentiality.

##### **Shared devices**

Since cookies are connected to the device and the browser used, it is not possible to determine the identity of the device user. Thus, some services and advertising offered on this device may not correspond to its use (the settings/browsing habits of other users of the device may influence the content offered).

You can choose the level of confidentiality of your device when deciding who can use it (persons authorized to access the device) and changing its settings (in particular, cookie settings).

##### **Cookie settings**

You can change your cookie settings at any time and several options are available, as described below.

The settings you choose may affect your browsing experience and the operation of some services that require the use of cookies. In this regard, we reject any liability for the consequences arising from the limited operation of our services caused by the deactivation of cookies on your device (inability to set or read a cookie).

##### **Computers (PC)**

You can manage cookies through various options in your browser settings to allow or block cookies, in general or for specific actions, at any time. Cookies are managed differently in each browser.

Visit your browser link to learn more:

- Managing cookies in Google Chrome:  
<https://support.google.com/chrome/answer/95647?hl=en>
- Managing cookies in Internet Explorer:  
<http://windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-11>
- Cookie management in Mozilla Firefox:  
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>
- Managing cookies in Safari:  
<https://support.apple.com/en-gb/HT201265>

- Managing cookies on Edge:  
<https://privacy.microsoft.com/pt-pt/windows-10-microsoft-edge-and-privacy>

For all other devices (smartphones, tablets, smart devices), see the help menu in your browser.

#### **Other tools**

In addition to the above solutions, third party companies have developed tools (browser plug-ins or add-ons) to manage the collection and use of cookies.

#### **SECURITY MEASURES**

A SWIFTSOLUTION SERVICES, S.A., has implemented all the appropriate technical and organizational measures to ensure a level of security of Personal Data appropriate to the risk and, in particular, to protect Personal Data against destruction, loss, alteration, unauthorized disclosure or accidental or illegal access.

The same level of protection is contractually imposed by SWIFTSOLUTION SERVICES, S.A., to its Subcontractors.

Any SWIFTSOLUTION SERVICES, S.A., employee who, during his or her work, may have access to his or her Personal Data shall keep them strictly confidential.

#### **EXERCISE OF YOUR RIGHTS**

You may, at any time, in accordance with the applicable rules regarding the protection of Personal Data, exercise your rights of access, rectification, deletion and transfer of your Personal Data as well as your rights to restrict and object to the Processing of your Personal Data.

You also have the right to object to the Processing of your Personal Data for the purposes of marketing law and thus ask to stop receiving promotional communications from SWIFTSOLUTION SERVICES, S.A., and/or other Ceetrus entities, at any time.

When the Treatment is based on your express authorization, you have the right to withdraw your authorization at any time.

To do so, you must submit your request at our branches, by e-mail to [dados@nhood.com](mailto:dados@nhood.com) sent with acknowledgment of receipt or by registered written letter to "Ángela Guerreiro, Departamento Financeiro e Legal - SWIFTSOLUTION SERVICES, S.A., - Rua Artilharia 1, no 51, Páteo Bagatela, Edifício 3, Escritório 3, 4, 5 e 6, 1250-038 Lisboa."

The request addressed by the client will be evaluated and answered by SERVICES, S.A., within a maximum period of 30 days.

To enable us to respond to your request, you must provide us with the following necessary identification data: name, surname, e-mail or address and any other information necessary to confirm your identity.

You also have the right to complain to the Supervisory Authority in case of violation of the rules applicable to the protection of Personal Data, in particular the RGPD.

#### **CHANGES TO OUR PERSONAL DATA PROTECTION POLICY**

The Personal Data Protection Policy can be changed by SWIFTSOLUTION SERVICES, S.A., at any time.

If SWIFTSOLUTION SERVICES, SA wishes to adjust the Policy (eg, if SWIFTSOLUTION SERVICES, SA wishes to use your Personal Data in any way other than that stipulated in the Policy in force at the time of data collection), a notice will be published notice of such changes in a revised version of the current Policy and the revised version will take effect when published.

SWIFTSOLUTION SERVICES, S.A., will publish such changes on the Personal Data Protection Policy page, informing the customer through a message when accessing the website, application or digital platforms.

We remind you that SWIFTSOLUTION SERVICES, S.A., is committed to not processing your personal data in a way incompatible with the initial objectives already mentioned, except when it is in compliance with the rules in force.

#### **QUESTIONS/CONTACT**

For any questions or comments related to our Policy or to the way in which SWIFTSOLUTION SERVICES, S.A., collects and uses your Personal Data and to exercise your rights related to your Personal Data collected, please contact the Data Protection Officer at the following address [dados@nhood.com](mailto:dados@nhood.com).