

## PRIVACY POLICY

Please read this Privacy Policy carefully. When accessing our website and our specialised platforms, the provision of your personal data implies knowledge of this Privacy Policy, as well as the policies and conditions of the entity providing the services to you through the specialised platforms.

### Who is responsible for collecting and processing data?

MULTICERT – Serviços de Certificação Electrónica, S.A., (hereinafter referred to as Multicert) is the entity responsible for the collection and processing of personal data related to the purposes specified below, and may, within the scope of its activity, use subcontracted entities to pursue the purposes indicated herein.

### Data Protection Officer (DPO):

Multicert's Data Protection Officer shall be contacted through the email [privacy@multicert.com](mailto:privacy@multicert.com), or through the following address:

MULTICERT - Serviços de Certificação Electrónica, S.A.,  
Rua Carlos Pinto Coelho, 13  
2720-092 Amadora - Portugal

### What is personal data?

Personal data is any information of any nature and regardless of its support, including sound and image, relating to an identified or identifiable person. Any person who can be identified directly or indirectly, through an identification number or one or more specific elements of his / her physical, physiological, psychic, economic, cultural or social identity, shall be considered identifiable.

### What personal data is collected and processed?

You can browse through Multicert's website without providing us with any personal data. When you fill out our forms, Multicert collects and processes, among others, the following personal data: name, telephone number, address and e-mail address or IP address. In the case of job applications, we collect and process personal data contained in CVs and/or motivation letters sent to us.

In any case, Multicert only collects the data necessary for the purposes for which they are intended.

Personal data collected in this website will in no case be made available, sold, shared or revealed to third parties, nor used for any purposes other than those described at the time of collection, or within the scope of this Policy.

Multicert assumes that the data has been provided by the holder of the data or that he/she has given consent to this effect and presumes that the data is true and up to date.

## How is your data collected?

Personal data may be collected by the following means:

- a) e-Mail;
- b) Website;
- c) Chat;
- d) Telephone Calls
- e) In person;
- f) Social Media.

The data collected is processed and stored electronically, in strict compliance with data protection rules. Data is stored in a specific database, created for this purpose, by Multicert or by the entities subcontracted by it.

Some of the personal data collected on the website is mandatory and, in case of lack or insufficiency of such data, Multicert may not be able to provide you with the services or information requested. In each case, Multicert will inform you of the mandatory nature of the provision of the personal data in question.

## What are the purposes and legal basis for processing your data?

In accordance with data protection principles Multicert may only process your personal data for specific purposes and if it has a legal basis to do so. Multicert uses your data for the following purposes and on the basis of the following grounds:

I. Because we are within the scope of a contract or at pre-contractual measures we process your data for the purposes of:

- a. Issuing digital certificates, renewals and management of the contractual relationship;
- b. Invoicing;
- c. Registration of New Customer Account on the website;
- d. Contact request "DO YOU HAVE ANY QUESTIONS?";
- e. Request for information "online chat";
- f. Technical support;
- g. Recruitment and selection of candidates in current job offers;
- h. Analysis and evaluation of spontaneous applications;
- i. Download e-books;
- j. Registration in webinars;
- k. Holding events.

II. On the basis of your consent we process your data for the purposes of:

- a. Sending you information regarding future opportunities such as training initiatives, internship programmes and/or job vacancies;
- b. Sending direct marketing and newsletters, if your consent is collected on the website;

III. Because we are required to comply with the law, we process your data for the purposes of:

- a. Complaints;
- b. Compliance with other legal or regulatory obligations.

IV. Because we have a legitimate interest in wanting to provide you, increasingly, with a better service, we process your data for the purposes of:

- a. Sending direct marketing and newsletters (if a pre-existing relationship exists);
- b. Generating statistics and measuring website activity for the benefit of users;
- c. Conducting market research, evaluation surveys and statistical analyses;
- d. Social Listening, which allows us to identify, analyse and respond to suggestions and interactions that you may have with Multicert on social networks, drawing up commercial profiles in order to create content that is of interest to our clients.

In order to pursue the purposes identified above, Multicert may interconnect the data collected for the purpose of updating and completing such data.

## With whom is your data shared?

The data collected and held by Multicert may be transmitted, complying with the duty of confidentiality and the purpose limitation principle, to the following entities:

- a) Companies or entities in which Multicert has a stake, which participate in its capital, or which are part of its business universe.
- b) Judicial or administrative authorities, in cases where such a cession is mandatory;
- c) INCM (Imprensa Nacional - Casa da Moeda) in the case of the complaints book;
- d) Recruitment and selection companies;
- e) Subcontractors who will process the data on behalf of Multicert and according to the purposes defined by Multicert.

## "COOKIES"

A cookie is a small text file that a website installs on your computer or mobile device when you visit it. Cookies can help identify your browser and may store information, for example, settings and user preferences.

Multicert may store cookies on your device to personalize and make browsing as easy as possible but will not provide references or personal data of the user.

For further information you should read our [Cookies Policy](#).

## What are your rights?

Under the data protection legislation, we guarantee you the right of access, update, rectification, delete, portability, and erasure of your personal data. You can also file complaints with the National Data Protection Commission (CNPD).

The exercise of these rights must be carried out through the following email address [privacy@multicert.com](mailto:privacy@multicert.com) or to the address:

MULTICERT – Serviços de Certificação Electrónica, S.A.,  
Rua Carlos Pinto Coelho, 13  
2720-092 Amadora - Portugal

## For how long is your data stored?

The period of time during which the data is retained and stored differs in accordance with the purpose for which the data is processed. Where there is no specific legal requirement, the data shall be retained and stored only for the minimum period necessary for the purposes that motivated its collection or subsequent processing, after which they will be deleted.

## Is your data safe?

Multicert is committed to ensuring the protection and security of your data. To that end, Multicert has adopted a series of technical and organizational security measures in order to protect the personal data you make available to us, against its unauthorized diffusion, loss, misuse, alteration, treatment or access, as well as against any other form of illicit treatment.

Multicert requires its subcontractors and its partners to adopt safety measures equivalent to those it practices. Notwithstanding the security measures practiced by Multicert, the end user must take additional security measures, such as: ensuring that you use properly configured security-enhanced equipment and a Browser with an active firewall, anti-virus and antispyware, you should be aware of the authenticity of other websites you visit on the internet, avoiding websites that you do not trust.

## In which situations can your data be communicated?

Multicert acknowledges that it might be necessary to communicate users' data within the context of mergers, acquisitions and / or incorporation processes of which it might take part of, not considering that communication as a transfer of data to third parties, nor if there is any subcontracted treatment.

Multicert may also transmit data to third parties in the context of investigations, inquiries and judicial, administrative and / or similar proceedings, as long as it is requested by court order.

## Social Media

Multicert's social media pages are managed by Multicert itself and have been created to provide a space for sharing information about the company and the service it provides. Moreover, news, launches and brand actions are also shared there.

Multicert informs that it does not guarantee the answer to all questions or doubts placed on these pages, although it tries to provide regular answers, according to the relevance of the updates and pertinence of the subjects.

For a good use of these pages, all users must respect the general rules of the respective social networks and Multicert's terms of use. Multicert reserves the right to remove comments that may be inappropriate or offensive and/or comments related to the following subjects:

- a) Defamation, abuse, harassment, stalking, threats or that violate in any way the legal rights (such as the rights to privacy and integrity) of others.
- b) Publication or sharing of defamatory, abusive, obscene, indecent, misleading or illegal information.
- c) Publication that advertise other brands, products and/or services.
- d) Publications with copyrights, legal notices or trademarks erased.
- e) Publications with falsified information.

- f) Uploaded or attached files or any other type of information protected by copyright (or intellectual property) unless he/she owns the rights to the information published.
- g) Uploaded or attached files that contain images of third parties unless he/she holds the image rights over the published information.
- h) Uploaded or attached files that contain viruses, corrupted files, or any other program or software that may corrupt the functioning of third party computers.

Likewise, private and direct messages sent via social network channels must not contain content of the same nature as that referred to in the previous paragraphs.

Multicert shall not be held responsible for the public sharing of any personal data by the data subject on its social networks.

The use of Multicert's social networks may involve the transmission of data to social network service providers, which may be based outside of the European Union or the European Economic Area. Each social network has its own privacy policy, distinct from the others, which the user must consult.

## **How is the transfer of data carried out?**

In case of data transfers to third countries that do not belong to the European Union or to the European Economic Area, Multicert will comply with the law, particularly regarding the suitability of the country of destination for the protection of personal data and the requirements which are applicable to such transfers, and personal data will not be transferred to jurisdictions that do not provide security and protection guarantees.

## **Changes to this Privacy Policy**

Multicert reserves the right at any time to make adjustments or changes to this Privacy Policy, being these changes duly published on this website.

## **Privacy Policy Update Date**

This Privacy Policy was last updated on 29 June 2023.