



# SÍTIO COMUM, LDA

## Privacy Policy and Protection of Personal Data

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### Purpose and Scope

Sítio Comum, Lda hereby adopts the Privacy Policy and Protection of Personal Data, whose main objective is to ensure that the processing of personal data complies with the rules established in the General Regulation of Data Protection (EU) 2016/679, and other legal provisions, in particular with regard to the processing and protection of personal data and the free movement of such data, in accordance with the needs of our customers, partners and employees.

### Responsible for the Treatment

<b>Social designation:</b>	Sítio Comum, Lda
<b>address:</b>	Rua Cidade de Guimarães, 187 - São Torcato 4800-858 Guimarães - Portugal
<b>Contacts:</b>	253519465   <a href="mailto:dados@overstate.pt">dados@overstate.pt</a>

### Personal Data and Consent of the data subject

Personal Data is 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, namely by reference to an identifier such as the name, identification number or one or more specific elements of his physical, physiological, mental, economic, cultural or social identity.

**Sensitive Data:** Personal Data relating to philosophical or political beliefs, trade union membership, religious belief, private life and racial or ethnic origin, as well as the processing of data on health and sexual life, including genetic data.

**Consent of the data subject:** Any express, free, specific, informed and explicit willingness, according to which the data subject accepts, by means of a declaration or an unequivocal positive act, that their personal data are processed.

### Data Owner

Data Owner is understood as the natural person to whom the data relate.

Concerning the activity of the Sítio Comum, Lda, most of the processed data are collective persons (companies and associations). However, in order to carry out its tasks, data of the following types of natural persons may be collected and processed:

- Employees;
- Clients and their collaborators;
- Service providers and their collaborators;
- Suppliers and their collaborators;
- Visitors to events where the Sítio Comum, Lda is present as an exhibitor;



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## Purpose of data processing

The personal data collected by Sítio Comum, Lda are processed for specific, explicit and legitimate purposes. Whenever personal data are collected, they are intended exclusively for the purposes expressly identified at the time of collection. Here we outline the main purposes that justify the collection of personal data by the Sítio Comum, Lda:

- Treatment of personal data of its workers, under the contract of employment:
- Treatment of personal data of its suppliers and customers (individual name), in the scope of the commercial relation.

## Collection, processing and preservation of Personal Data

Personal Data Processing means any operation or set of operations performed on Personal Data, with or without automated means, such as collection, registration, organization, conservation, adaptation or alteration, retrieval, consultation, use, communication by transmission, dissemination or otherwise making available, by comparison or interconnection, as well as limitation, erasure or destruction.

Sítio Comum, Lda will only process Personal Data if it is necessary for the continuation of its activity, compliance with legal or contractual obligations or for the pursuit of the purposes indicated above.

Sítio Comum, Lda assumes that the data collected was inserted / made available by the respective owner and that its insertion / making available to Sítio Comum, Lda, has been authorized by it, and the Personal Data in question is true and accurate. Sítio Comum, Lda shall take appropriate measures to ensure that inaccurate or incomplete data are erased or rectified, taking into account the purposes for which they were collected or for which they are subsequently processed.

The Personal Data collected will be stored in such a way that they can be identified only for the period necessary to carry out the purposes of collection or further processing, after which they will be definitively eliminated without any possibility of recovery. In case it is necessary to retain the data for a certain period of time, the information must be preserved with restricted access.

## Communication to Third Parties

Sítio Comum, Lda may communicate Personal Data to third parties, within the scope of compliance with a legal obligation, a decision of the National Data Protection Commission (CNPD) or a court order; when the communication of data is carried out to protect vital interests of the holder of the Personal Data; in connection with a sale, assignment or other transfer of the business to which the Personal Data relates; or any other legitimate purpose under the LPDP.

## Subcontracting

Sítio Comum, Lda may communicate the Personal Data to entities subcontracted by them for the purpose of handling them, on behalf of and under the instructions of Sítio Comum, Lda as responsible entity.

Sítio Comum, Lda will only contract entities that offer sufficient guarantees regarding the technical security measures and organization of the Treatment of Personal Data to be made, and must ensure compliance with these measures. Such subcontractors will be subject to full compliance with the rules set forth in these Data Processing Conditions, when processing Personal Data on behalf of and under instructions of Sítio Comum, Lda



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## Rights of Data Holders

In accordance with current legislation, Data Rights holders are guaranteed a set of rights that they may exercise with the Sítio Comum, Lda:

- **Right of access:** right that allows you to obtain information regarding the treatment of data and its characteristics.
- **Right of rectification:** right that allows to request the rectification of your data, requiring that they be accurate and current.
- **Right to delete data or "Right to be forgotten":** right that allows to request to delete data, when considered that there are no valid grounds for data retention and provided that there is no other valid basis for such treatment (such as the execution of a contract or the fulfillment of a legal or regulatory obligation).
- **Right to Limitation:** right that allows the suspension of treatment or limitation of treatment to certain categories of data or purposes.
- **Right to Portability:** right through which you can request the sending of your data, in digital format and current use, that allows the re-use of such data. Alternatively, you may request the transmission of your data to another entity that becomes responsible for the processing of your data.
- **Right of Opposition:** right that allows you to oppose certain purposes and provided that there are no legitimate interests that prevail over your interests.
- **Right to Withdraw Consent:** right that allows you to withdraw your consent, but which can only be exercised when your consent is the only condition of legitimacy.

## Security measures

Sítio Comum, Lda implements technical and organizational measures necessary to protect Personal Data in accordance with the level of confidentiality of the data to be protected.

## Changes to the Description / Conditions of Data Processing

Sítio Comum, Lda reserves the right at all times to change, add or revoke, partially or totally, the present Conditions of Data Processing. Any changes will be timely disclosed through written communication.

## Clarifications

To find out more about how Sítio Comum, Lda treats your personal data, or to clarify any doubt, make any complaint or comment about the Privacy Policy, please contact us through the contacts mentioned in the identification of the responsible by treatment.

## Validity

This Data Processing Description / Conditions shall take effect on May 25, 2018.

**SÍTIO COMUM, LDA.**  
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