

### Identification

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PRIVACY POLICY v0.1

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### INTRODUCTION

valuedate.io assumes as a fundamental mission the commitment for Privacy and protection rules on Personal Data for its candidates, employees, customers and others.

This Privacy Policy purpose is to provide information on the duties that you have under the General Data Protection Regulation "GDPR".

Our Privacy Policy rules respect and comply with current European Regulation (GDPR) and Portuguese legislation (Law No. 58/2019).

Given our strong commitment to protecting privacy, we will update these rules whenever we see necessary.

# RESPONSIBLE FOR PROCESSING PERSONAL DATA

valuedate.io is responsible for processing Personal Data that you make available to us.

Personal data is any data related to a natural person identified or identifiable directly or indirectly through this data, such as a name, an identification number, location data, email address, or other elements of physical identity, physiological, genetic, mental, economic, cultural or social for that person.

# HOW AND WHEN YOUR PERSONAL DATA ARE COLLECTED

valuedate.io accesses and/or processes personal data for various purposes, including:

- a. recruitment;
- b. hiring and managing human resources;
- c. product development.

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### WHAT IS THE LEGALITY OF PROCESSING PERSONAL DATA

- 1. Consent: personal data may be processed by means of a free, specific, informed and explicit expression of will, under which you accept, by declaration, or unequivocal positive act, that the personal data will be processed by valuedate.io. For recruitment purposes we will inform you that we will collect personal data for consideration in future applications.
- 2. Contract execution and legal obligations: we will access and/or process personal data based on the execution for the contract or for the legal obligations fulfillment whenever necessary, namely in the hiring and management of human resources managed by valuedate.io and in the contractual exercise with valuedate.io customers products.

## GENERAL RULES APPLICABLE TO COLLECTION AND PROCESSING

valuedate.io will treat Personal Data with absolute confidentiality, in a lawful, transparent manner and in compliance with the good faith principles. It guarantees the Personal Data collected is adequate, relevant and not excessive in relation to the purposes for which it is collected and processed.

The Personal Data collected is processed by computer, being stored in specific databases, created and managed for this purpose in strict compliance with the legislation for the personal data protection.

valuedate.io will not communicate Personal Data to third parties, except in compliance with applicable legal obligations or, whenever necessary for the services provision that are contracted and for which the data were provided.

If valuedate.io hires external collaborators or service providers, such as its subcontractors, they will have to comply with these data protection rules, signing written agreements for this purpose, which ensure that, in this matter, they exclusively obey valuedate.io's instructions and use the appropriate technical and organizational rules to comply with our privacy policy.

valuedate.io is committed to ensure the Personal Data security and confidentiality, collected and processed by it, adopting security measures, on a technical and organizational nature, in order to protect personal data against dissemination, loss,

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misuse, unauthorized alteration, processing or access, as well as against any other form of unlawful processing, such as protection of information technology systems through a firewall, unauthorized access control, back-ups policy and other good information security practices based on ISO 27001.

valuedate.io also requires its partners to adopt security measures, both technical and organizational nature, equivalent to those it practices and adopts, and to guarantee the strictly necessary access to Personal Data.

We also respect your information confidentiality, so we do not sell, distribute or otherwise commercially make your information available to third parties.

#### RETENTION PERIOD FOR PERSONAL DATA

Personal Data are stored and preserved by valuedate.io, for the minimum period necessary for the purposes that motivated its collection and subsequent processing. Where there is no specific legally fixed deadline, the data will be stored and preserved for five years. Once the maximum retention period is reached, personal data will be securely destroyed.

### PERSONAL DATA SUBJECT RIGHTS

At any time the Personal Data Subject may:

- a. Request access to the information we maintain about it;
- b. Request information rectification we have about him if it is inaccurate or incomplete;
- c. Request your personal data deletion;
- d. Request your personal data processing limitation;
- e. Oppose data processing;
- f. If the treatment depends on your consent, Data Subject is entitled to withdraw it at any time.

If consent is legally required for Personal data processing, the data subject has the right to withdraw the consent at any time, although this right does not compromise the lawfulness of processing carried out on the basis of the consent previously given, or further processing for the same data, based on another legal basis, such as the contract fulfillment or legal obligation to which valuedate.io is subject.

The exercise of these rights must be carried out by sending an email to info@valuedate.pt.

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Please note that in certain cases (e.g. due to legal requirements) your request may not be immediately fulfilled. In any case, you will be informed on the measures taken in this regard, within one month period, from the moment the request is made.

The data subject also has the right to file a complaint with the CNPD - Comissão Nacional de Protecção de Dados, when he/she considers that there is a violation of his/her rights.

### **COOKIES POLICY**

valuedate.io shares the website (<a href="https://www.valuedate.io">https://www.valuedate.io</a>) with its visitors exclusively for informational purposes and as a point of contact to request information.

Cookies are small files of numbers and letters stored in the User's browser when the User visits the website. This information is used to provide the user with a more personalized service, improving the performance and browsing experience, increasing, on one hand, the speed and efficiency of the website's response and, on the other hand, eliminating the need to repeatedly introduce them to information. The placement of cookies will help the website to recognize the device the next time the User visits it.

You can check our cookie policy through this link: <a href="https://www.valuedate.io/cookiepolicy">https://www.valuedate.io/cookiepolicy</a>.

If you have any questions regarding the Personal Data processing, please contact our company at the following address: info@valuedate.pt.

Viana do Castelo October 2021 Last version approved valuedate.io's CEO (Jorge Rasteiro)

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