



JOSÉ DE MELLO

PRIVACY POLICY OF JOSÉ DE MELLO CAPITAL, S.A.

José de Mello Capital, S.A. (hereinafter “**José de Mello Capital**”), within the scope of the provision of its services and of the programmes it conducts, needs to collect certain personal data from customers (natural contact persons), stakeholders as well as natural persons who send communications to the e-mail address provided in the programme website (hereinafter “data subject”).

On the other hand, the ever more frequent interaction with the users of websites www.josedemello.pt, grow.josedemello.pt and voluntariado.josedemello.pt (hereinafter “**websites**”), also requires, in some cases, (i) the collection of personal information in order to use certain contents and functionalities provided in the websites and (ii) the collection of data from your devices (through files referred to as cookies), in order to improve website performance and navigability.

Thus, this Privacy Policy seeks to inform which personal data we collect, how and why we use them, to whom we disclose them and how we protect the privacy of data subjects.

WHY?

José de Mello Capital is committed to protect the safety and privacy of data subjects. Within this context, we have prepared this Privacy Policy with the purpose of asserting our commitment and compliance with the rules of personal data privacy and protection.

We intend data subjects to become aware of our general privacy rules and the processing terms of the data we collect, in strict compliance with the applicable legislation within this scope, namely the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“**General Data Protection Regulation**”).



JOSÉ DE MELLO

José de Mello Capital seeks to comply with suitable practices concerning personal data security and protection, promoting awareness actions and improving systems in a way to safeguard the protection of data provided by data subjects.

Website use and navigation, the filling in of our forms and direct or indirect data supplied by data subjects imply they are aware of and accept the conditions of this Policy and any other terms, policies and specific conditions regarding the established relation. By providing your personal data, you are authorising their collection, processing, use and disclosure according to the rules set forth herein.

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Any reference in this Privacy Policy to José de Mello Capital, S.A., José de Mello Capital or “we/us” shall be construed as referring to José de Mello Capital, S.A. (company registered in Portugal, with registered office at Avenida 24 de Julho, n.º 24, 1200-480 Lisbon, legal person number 505 765 640, registered at the Companies’ Registry Office under the same number), considered to be, for this purpose, the data controller, under the terms of the General Data Protection Regulation.

WHAT ARE PERSONAL DATA?

Personal data are any information, of any nature and regardless of the media it is in, including sound and image, relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as an identification number or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.



JOSÉ DE MELLO

WHAT PERSONAL DATA DO WE COLLECT?

We collect and process your personal data which are necessary for purposes of provision of our services and management of our contractual relations and participation on our Programmes.

We can also receive your personal data from our suppliers who provide services to you on our behalf, from our partners or from third parties acting on our behalf.

For more information about the sharing of your data with other entities, please refer to the section “IN WHAT CIRCUMSTANCES ARE DATA TRANSMITTED TO OTHER ENTITIES?” below.

Categories of personal data we process

Personal data	When they are collected/processed
The communications you exchange with us (for example, e-mails, letters or calls) requesting a contact or clarifications, submitting complaints, comments or suggestions.	When you come in contact with us or when we contact you.
Your name, place of residence and contact details and your taxpayer and identification numbers.	When we formalise the contractual relation.
Your name, place of residence, contact details (telephone and/or cell-phone numbers), e-mail address, workplace (company of the José de Mello group), participation in previous volunteer service programmes, identification of the institution, identification of the type of action and whether you received training for volunteer service.	When you complete the Application Form for the Programme and Volunteer Service available at www.voluntariado.josedemello.pt .



JOSÉ DE MELLO

Personal data	When they are collected/processed
Your name, e-mail address and telephone number.	When you complete the form in order to be contacted by the Grow team, available at www.grow.josedemello.pt .
Your name and e-mail address.	When you complete the contact form available at www.josedemello.pt .
Your e-mail address.	When you subscribe to the <u>Time to Grow</u> newsletter, in order to know about news and initiatives as well as the services provided by other companies of the José de Mello group identified at josedemello.pt/empresas/ .
Your images and photographs.	When you participate in our events, in initiatives for promotion of our services and internal communication and/or in our Programmes.
Your opinion about us.	When you submit communications, complaints, and suggestions to our websites.
Information on how you use our websites.	When you use our websites, under the terms of the Privacy and Cookie Policies of the websites.

Special categories of personal data

Within the scope of our activities, we may collect data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs. These data are included in “special categories of personal data”, under the terms of the General Data Protection Regulation.

We collect this kind of information only upon your explicit consent, namely within the scope of organisation of events.



JOSÉ DE MELLO

FOR WHAT PURPOSES ARE YOUR PERSONAL DATA COLLECTED?

Personal data of data subjects are used within the scope of provision and management of contracted services, of the contractual relation established or in the Programmes we develop.

Personal data collected directly or through the websites are specifically processed for the purpose of enabling users to use the functionalities of the websites, namely so that José de Mello Capital is able to answer information and contact requests submitted by users and so that users (who are collaborators of the José de Mello group or their families) are able to participate in the Programmes developed by José de Mello. More detailed information on the processing of your data within the scope of the websites can be found in the Privacy and Cookie Policies available at each website.

Personal data collected will be processed under the terms and for the purposes described herein, as well as, in certain cases, for the compliance with our legal obligations.

Thus, we use your personal data for the following purposes:

- **In order to provide our services**

When the company you work in requests the provision of our services, we use your information, as described above, to provide our services of economic and financial consultancy, management and investment consultancy, reorganisation of companies, strategic planning, accounting services, human resource advisory services, marketing and communication and image and provision of services connected therewith.

- **In order to communicate and manage our relationship with you**

We may occasionally contact you by e-mail and/or text message for administrative or operational reasons, for example, in order to send you information regarding the services contracted by the company you work in or to provide you with information about your contractual relation with us.

- **In order to manage our Programmes**

When you take part in the Programmes (Volunteer Service Programme, Holiday Camps, “*Conhecer o Grupo*” Programme, “*Ser Voluntário*” Programme and “*Bolsa de Voluntários*”



JOSÉ DE MELLO

Programme), we use your personal information, as described above, in order to manage your participation and ensure the attainment of the objectives thereof.

- **In order to inform you about news of interest to you**

We may send you our newsletters *Tradição do Futuro* and *Time to Grow*, in case you have indicated you wish to receive them.

Please note that we do not share your personal data with other companies for marketing purposes, except if you have given us your consent to that effect.

In case you do not wish to receive further marketing communications on our part or our newsletters, just send an e-mail to privacidade@josedemello.pt mentioning on the subject “No more newsletters” / “I do not wish to receive communications”.

- **In order to improve our services and attain our administrative and commercial goals**

The business purposes for which we may use your data include accounting, invoicing and auditing, fraud analysis, safety, legal and procedural purposes, statistical surveys, as well as the development and maintenance of systems.

- **In order to comply with our legal obligations**

Namely, the obligation of providing your personal data to competent administrative and government authorities, under the legal terms.

FOR HOW LONG ARE YOUR PERSONAL DATA STORED?

Your personal data necessary for the aforementioned purposes will be stored for the entire period of your contractual relation with José de Mello Capital, and may be stored for a longer period, set forth in the law or for purposes of defence of a right/interest within the scope of judicial proceedings.

Data processed for purposes of our newsletters will be stored while you are interested in receiving them and you do not withdraw your consent.



JOSÉ DE MELLO

WHAT ARE THE RIGHTS OF DATA SUBJECTS?

Under the terms provided in the law, you may at all times exercise your rights regarding any personal data concerning you:

- **Right to Rectification:** you shall have the right to obtain from José de Mello Capital the rectification of inaccurate personal data concerning you, as well as the right to have incomplete personal data completed, where appropriate.
- **Right to Erasure:** you shall have the right to request the erasure of your personal data in certain cases, namely, but not limited to, the personal data no longer necessary in relation to the purposes for which they were collected or otherwise processed, in case you withdraw your consent on which the processing is based, among others;
- **Right to Data Portability:** in certain cases, you shall have the right to receive the personal data concerning you, which you have provided to José de Mello Capital, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller.
- **Right to Restriction of Processing:** you shall have the right to request the restriction of processing in certain cases, such as where the processing is unlawful and you oppose the erasure of the personal data, José de Mello Capital no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims, among others;
- **Right to Object:** you shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data (i) for the purposes of legitimate interests pursued by José de Mello Capital or third parties, or if they are processed for purposes other than the ones for which they were collected or if the processing is not performed with the consent of the data subject or based on the European Union or Member States' laws, or (ii) where personal data are processed for direct marketing purposes, including profiling, or (iii) where personal data are processed for scientific or historical research purposes or statistical purposes.



JOSÉ DE MELLO

You may exercise said rights directly by submitting a written request to José de Mello Capital to privacidade@josedemello.pt or to the postal address Avenida 24 de Julho, n.º 24, 1200-480 Lisbon.

Under the legal terms, you shall also have the right, through the aforementioned means, to withdraw your consent for data processing in which consent constitutes the grounds for the legitimacy of said processing. For that purpose, you are entitled to withdraw your consent at any moment, which does not preclude, however, the processing performed up to that moment based on the consent previously granted.

Notwithstanding any other administrative or judicial procedure, data subjects are entitled to submit a complaint to the National Data Protection Committee or any other competent supervisory authority under the law, in case they consider that their data are not being legitimately processed by José de Mello Capital, under the terms of the applicable legislation and this Policy.

WEBSITES

This Policy is fully applicable to all users of the websites (www.josedemello.pt, grow.josedemello.pt and voluntariado.josedemello.pt), and must be complemented by the provisions in the Privacy and Cookie Policies of the websites.

WHAT SECURITY MEASURES HAVE BEEN TAKEN BY JOSÉ DE MELLO CAPITAL?

José de Mello Capital makes all efforts to protect its Customers' personal data against unauthorised accesses through the Internet. For that purpose, it makes use of all available technical means to avoid loss, misuse, alteration, unauthorised access, disclosure, loss or destruction and illegal appropriation of any given or communicated personal data, undertaking to comply with the legislation regarding the protection of data subjects' personal data and to process said data only for the purposes for which they were collected, as well as to ensure that said data are processed with suitable security and confidentiality levels.



JOSÉ DE MELLO

It is, however, the responsibility of data subjects to guarantee and ensure that the computer they use is suitably protected against malicious software, computer viruses and worms. They must also be aware that, without taking adequate security measures (such as setting a safe configuration for the browser, updating the antivirus software, setting up a firewall and avoiding software of dubious origin), the risk of personal data and passwords being accessed by unauthorised third parties is aggravated.

However, it should be noted that, whenever the collection of data is performed on open networks, such as the Internet, your data may circulate without security conditions, and there is a risk they are seen and used by unauthorised third parties.

As described in this Privacy Policy, in some cases, we may transmit your personal data to third parties. José de Mello Capital has set clear contractual regulations concerning the processing of personal data for its data processors, and demands that they adopt any suitable technical and organisational measures to protect your personal data. However, in some cases, we may be forced under the law to transmit your personal data to third parties (such as supervisory authorities or judicial authorities), regarding whom we have limited control over personal data protection.

IN WHAT CIRCUMSTANCES ARE DATA TRANSMITTED TO OTHER ENTITIES?

José de Mello Capital resorts to other entities for the provision of certain services. Said provision of services may imply that they access to personal data of data subjects.

Thus, any data processor of José de Mello Capital will process the personal data of data subjects, on behalf of José de Mello Capital, in strict compliance with our instructions. José de Mello Capital ensures that said data processors offer sufficient guarantees of compliance with suitable technical and organisational measures so that the processing meets the applicable legal requirements and ensures the security and protection of the data subjects' rights, under the terms of the outsourcing agreement entered into with said data processors.

Upon your consent, José de Mello Capital may transmit your personal data to other entities belonging to the José de Mello group for marketing purposes of said entities.



JOSÉ DE MELLO

In certain situations, your personal data may also be transmitted to third parties where said data disclosure is necessary or adequate (i) under the applicable legislation, (ii) in compliance with legal obligations/judicial orders, (iii) upon resolution of the National Data Protection Committee or another competent supervisory authority, or (iv) to respond to requests from public or government authorities.

In any of the aforementioned situations, José de Mello Capital undertakes to take all reasonable measures in order to ensure the effective protection of the personal data it processes.

CONTACT US

Please contact José de Mello Capital in order to obtain further information about the processing of your personal data, as well as for any other question regarding the exercise of the duties conferred to you by applicable legislation and, in particular, the ones mentioned in this Policy, using the following contact details:

Telephone: +351 21 391 60 88

E-mail: privacidade@josedemello.pt

HOW CAN YOU BECOME AWARE OF ANY CHANGES TO OUR PRIVACY POLICY?

We may change this Privacy Policy at any moment. Said changes will be duly publicised through the websites (www.josedemello.pt, grow.josedemello.pt and voluntariado.josedemello.pt) and, in case they involve a substantial alteration regarding the way your data are processed, they will be communicated to you through the contact details you have given us.

Lisbon, 24 May 2018