

The Privacy Policy of CONSULAI. CONSULTORIA AGRO-INDUSTRIAL, LDA. ("CONSULAI") is based on the utmost respect for the **privacy and protection of personal data** of everyone that trusts us with such a valuable asset.

CONSULAI processes all personal data in strict compliance with the *General Data Protection Regulation* ("GDPR"), as well as other legislation concerning data protection.

The processing of personal data carried out by CONSULAI is especially governed by the following principles: **lawfulness, loyalty and transparency** in data processing; **purpose limitation; minimisation of data; accuracy; storage limitation; integrity, confidentiality and responsibility.**

Throughout this Privacy Policy, CONSULAI sets out the terms and conditions of the processing that it carries out on personal data, as well as the exercising of rights that the legal framework gives to data subjects.

### **1. Who is responsible for the data processing?**

CONSULAI - CONSULTORIA AGRO-INDUSTRIAL, LDA, VAT number 505223260, with headquarters at Rua Fernando Namora, nº 28, 1º Esq., 7800-502 Beja, Tel: (+351) 213 629 553, Fax: (+351) 213 621 091, [consulai@consulai.com](mailto:consulai@consulai.com), [www.consulai.com](http://www.consulai.com), is the entity responsible for processing personal data collected through the website.

### **2. Which data are processed and how are they collected?**

CONSULAI only collects data that are appropriate, relevant and limited to what is strictly necessary for the purposes for which they are processed, namely:

- a) Clients, suppliers, partners, workers: identification, professional or accounting-related data, in the case of individuals or their representatives. In the case of legal persons, name, nationality, contact, personal ID data, position, duties, professional contacts and any other personal data whose processing is strictly necessary for the contract enforcement or compliance with legal obligations;
- b) Participants in conferences, workshops and other events: identification data such as name, phone and email address;
- c) Contact requests and/or call for proposals: identification data such as name and email address;
- d) Newsletter subscription: identification data such as name and email address;
- e) Applications: identification data such as name and email address and any data presented in the CV.

Personal data are collected through different means, namely by filling in forms on the CONSULAI *website* for the sending of emails, telephone contacts, personal delivery, proposal requests, sending professional applications or for hiring services of or by CONSULAI.

### **3. What legal basis and for what purposes are personal data processed?**

CONSULAI only processes personal data when there is a legal basis that justifies it.

The legal bases for processing clients', suppliers', partners' and workers' personal data are the contract enforcement and the compliance with legal obligations whereby CONSULAI is bound, pursuant to Article 6(1)(b) and (c) of the GDPR.

The processing of clients', clients' employees', suppliers', partners' and workers' personal data is intended for any purposes directly related to enforcement of the respective contracts, namely recruitment, hiring, contract management, job management, accounting, commercial activity, client management, communication, or call for proposals.

Personal data processing for purposes that have not been mentioned, namely personal data collected through the CONSULAI website or following the sending of emails with contact requests, depends on the data subjects' consent pursuant to Article 6(1)(a) of the GDPR.

The processing of personal data collected through the CONSULAI website or email address is intended for replying to contact requests, namely sending proposals/quotes or other information about services, sending marketing communications such as newsletters, latest service news, information about events or other recruitment-related activities.

### **4. To whom are personal data conveyed?**

CONSULAI only conveys personal data to third parties in cases where it is necessary to comply with legal obligations to which CONSULAI is subject, namely judicial and regulatory authorities and other public entities and CONSULAI service providers, chosen through compliance with strict requirements and that are restricted to compliance with the legal regulations concerning personal data protection matters.

Additionally, CONSULAI conveys data in the context of proposals submitted to clients or in the context of projects and partners, in compliance with all requirements regarding compliance with the legal regulations concerning personal data protection matters.

The mentioned conveyance is limited to the extent that is strictly necessary for compliance with legal obligations and through appropriate security measures.

In any other case, personal data will not be conveyed without the data subject's permission.

### **5. For how long are personal data stored?**

CONSULAI only stores personal data to enable identification of data subjects during the period which is strictly necessary to carry out the purposes for which they are processed, without prejudice to the need for storage for a longer period in order to comply with legal obligations.

Without prejudice to exercising data deletion rights, personal data are deleted as follows:

- a) In the case of participants at conferences, workshops and other events: 6 months from the submission of the event in question.

- b) In the case of contact requests or call for proposals: 6 months from the request or proposal submission, without there being a subsequent contact;
- c) In the case of personal data collected through newsletter subscriptions: 2 years from the date of obtaining consent;
- d) In the case of personal data collected through applications: 1 year from the respective submission, in the event the applicant is not selected; 5 years, in the case of recruitment processes, from the respective conclusion, in the event the applicant is not selected.

## **6. What rights do data subjects have?**

Personal data subjects have the right, at any point, to withdraw consent, without compromising the lawfulness of processing carried out by CONSULAI and in the consent previously given, to request the access to personal data that concerns them, as well as correction, deletion and/or limitation thereof, as well as requiring the portability of data, when admitted by law or under contract.

For the purposes of exercising rights, data subjects should send an email to [consulai@consulai.com](mailto:consulai@consulai.com).

Data subjects also have the right to submit complaints to the competent authority for this purpose.

## **7. How is data security guaranteed?**

CONSULAI adopts and commits to applying technical and organisational measures where appropriate in order to ensure that the processing complies with the GDPR, considering the nature, scope, context and the purposes of data processing, as well as the risks to individuals' rights and freedoms, of which the likelihood and severity can vary.

These methods are updated whenever necessary and revised annually.

CONSULAI can update the Privacy Policy whenever it is deemed necessary and it is therefore advisable to consult it regularly.

## **8. How does data security operate on CONSULAI's website?**

Our website address is: <https://consulai.com> or <http://consulai.pt>.

### **8.1 What personal data are collected and how are they collected?**

#### *8.1.1 Comments*

When visitors leave comments on the site, data on the comment form are saved, as well as the IP address and the browser user agent, to help with spam detection.

An anonymous string created through the user email address (also known as a hash) can be sent to Gravatar to check if the user is using it. Gravatar's privacy policy is available here: <https://automattic.com/privacy/>. After the user comment is approved, the profile picture is displayed publicly next to the comment.

### *8.1.2 Multimedia*

When uploading images to the site, the user should avoid uploading images with GPS embedded data. Visitors can download and extract the GPS data from the website's images.

### *8.1.3 Cookies*

If the user leaves a comment on our site, the user can opt to save his/her name, email address and site in cookies. This is for the convenience of the user, to save from having to fill in data again when leaving another comment. These cookies will last one year.

If the user has an account and login on our site, a temporary cookie will be set up to determine if the browser accepts cookies. This cookie does not contain personal data and it will be deleted when the browser is closed.

When logging in, cookies will be set up to save the user login information and display screen choices. Login cookies last one year. If the user selects "Remember Me," the active session will continue for two weeks. When logging out, the login cookies will be removed.

If the user edits or publishes an article, an additional cookie will be stored in our browser. This cookie does not include personal data, it only indicates the content ID of the article that has been edited. It expires after one day.

### *8.1.4 Embedded content from other sites*

Articles on our site can include embedded content (for example: videos, images, articles, etc.). The embedded content from other sites behaves as if the user visited those sites.

Our site can collect data about users, use cookies, incorporate third-party tracking and, therefore, monitor interactions, including registering interactions with embedded content if the user has an account and is logged in on our site.

## **8.2 How is analytical data security ensured?**

### *8.2.1 How long are the user data stored for?*

If the user leaves a comment, the comment and its metadata are saved indefinitely. This happens so that it is possible to automatically recognise and approve any subsequent comments, instead of placing them in a moderation queue.

For users that register on our site (if any), we save personal information given on the user profile. All users can see, edit, or delete their personal information at any time (with the exception of not being able to change the username). The site administrators can also see and edit that information.

### *8.2.2 What rights do you have concerning your data?*

If the user has an account on our site, or the user has left comments, the user can ask to receive an export file with saved personal data, including any personal data that has been indicated. The user can also

request that saved data are deleted. This does not include any personal data that are mandatory for administrative, legal or security purposes.

#### *8.2.3 Where your data are sent to*

Visitor comments can be checked through an automatic spam detection service.