



Lisbon, 15<sup>th</sup> May 2018

## Personal Data Protection and Privacy Policy

### Introduction

This Personal Data Protection and Privacy Policy sets out the terms in which Caixa processes Customers' personal data, as well as the rights it can exercise, pursuant to the provisions under Regulation (EU) 2016/679 of the European Parliament and of the Council - General Regulation on Data Protection (GRDP) - and other applicable national legislation in matters of privacy and data protection.

<https://eur-lex.europa.eu/legal-content/PT/TXT/PDF/?uri=OJ:L:2016:119:FULL&from=PT>

This Policy supplements the provisions under the General Account Opening Conditions for Natural Persons, as part of this matter and constitutes Caixa's commitment regarding data protection for its Customers.

### Definitions

The following definitions are used for making this Policy more easily understood:

- **Personal Data:** any information regarding a natural person who is or can be identified (the "data holder"); a natural person is deemed to be identifiable when he/she can be directly or indirectly identified, especially with reference to an identifier, such as a name, an identification number, location data, electronic identifiers or one or more specific pieces of information regarding physical, physiological, genetic, mental, economic, cultural or social identity of said natural person;
- **Processing of personal data:** this is an operation or a set of operations conducted on personal data or on sets of personal data, using either automated or non-automated means, such as collecting, recording, organising, structuring, keeping, adapting or amending, recovering, consulting, using, disseminating by conveyance, diffusion or any other form of availability, comparison or interconnection, limitation, deletion or destruction;
- **Person in charge for Processing Personal Data:** a natural or legal person that determines the purposes and the means of processing personal data.



- **Subcontractor:** a natural or legal person that processes personal data on behalf of Caixa, within the context of service provision, formalised via a Contract.
- **Controlling authority:** an independent public authority that, in the case of Portugal, is the National Data Protection Commission (NDPC), which is charged with supervising the proper enforcement of legislation on personal data protection.
- **Cookies.** computer files containing a sequence of numbers and letters that allows uniquely identifying a user's device with Internet access; however, they can contain other pieces of information, such as said user's browsing preferences at a given website. Cookies are downloaded via the browser to the device with internet access (computer, smartphone, tablet, etc.) when accessing certain websites;

### **Organisation Responsible for processing Data**

The organisation responsible for processing data is Caixa.

### **Processed data**

Caixa processes personal data that it collects as part of its business relation with Customers, and as part of fulfilling applicable legal and regulatory obligations.

### **Principles observed**

When Caixa processes data, it observes principles of lawfulness, honesty and transparency; limiting purposes; minimising data; accuracy; limiting conservation; integrity and confidentiality and responsibility.

### **Rationale for Processing Data**

In pursuing its activity, the processing of data that Caixa carries out adheres to certain explicit and specific purposes, as it ensures the duties of informing data holders.

Such processing is underpinned as follows:

- in fulfilling legal obligations;
- as part of enforcing contracts where to data holders are a party or in pre-contractual proceedings on request;
- in the pursuit of Caixa's legitimate interests;
- as well as in data holder consent.



## **Data Sharing**

Caixa may pass on data to CGD Group companies, while ensuring data confidentiality, compliance with the privacy policy implemented in accordance with the applicable legal requirements, with their use in line with the corporate object of CGD Group companies and always in a way that is compatible with the processing's determining purposes.

## **Rights of personal data holders**

Caixa enables its Customers to exercise their rights to access, correct, oppose, delete, and limit the processing of data.

Customers also have the right to submit a complaint to the National Data Protection Commission.

## **How to exercise one's rights**

Customers may exercise the aforementioned rights, via written communication submitted at any counter of our Branch network.

## **Data Conservation**

Caixa abides by the legal regulations governing personal data conservation periods, which can be under the following conditions:

- a) Up to ten years after the end of the contractual relationship;
- b) For as long as obligations subsist emerging from the contractual relationship;
- c) As long as the right can be enforced on Caixa.

## **Subcontractors**

In the pursuit of its activities, Caixa may turn to third parties (Subcontractors) for the provision of certain services, which could entail said third parties' gaining access to data holders' personal data. Caixa ensures that, under such circumstances, adequate technical and organisational measures are adopted in order to make sure that subcontracted organisations meet applicable legal requirements while offering suitable guarantees regarding personal data.



## **Safety Measures**

Caixa guarantees adequate security and personal data protection levels for data holders. For such purpose, it adopts various technical and organisational security measures, thus providing protection against personal data loss, dissemination, amending, processing or unauthorised access, as well as against any other type of unlawful processing.

## ***Data Protection Officer (DPO)***

Caixa appointed a *Data Protection Officer*, to whom personal data protection issues may be addressed, via the "Espaço Cliente" (Customer Area) at [www.cgd.pt](http://www.cgd.pt) and by letter sent to Caixa's registered office address, located at Avenida João XXI, nº 63, 1000-300 Lisbon.

## **Use of Cookies**

At its website [www.cgd.pt](http://www.cgd.pt), Caixa uses cookies to allow improving the performance and the browsing experience of personal data holders. This enhances the swiftness and efficiency of response, while doing away with the need to repeatedly enter the same information.

For more information, consult the Policy governing Cookies (Annex I).

## **Amending the Privacy policy and Cookies**

Caixa may update or make readjustments to this Privacy and Cookie policy, as said amendments shall be duly publicised.

# ANNEX I

## Cookie Policy

Caixa Geral de Depósitos, S.A., hereinafter referred to as "Caixa," uses cookies.

This Cookie Policy explains the types of cookies used by Caixa on its website [www.cgd.pt](http://www.cgd.pt), while excluding other sites.

You can choose the types of cookies that can be downloaded to your device with Internet access (computer, smartphone, tablet, etc.) by selecting the privacy settings under the Internet browser options used, hereinafter referred to as *browser*.

### I. What are cookies?

Cookies are computer files containing a sequence of numbers and letters that allows uniquely identifying your device with Internet access; however, they can contain other pieces of information, such as your browsing preferences at a given website. Cookies are downloaded via the browser to your device with internet access (computer, smartphone, tablet, etc.) when accessing certain websites.

### II. Types of cookies used and their purposes

Cookies are ranked according to their life cycle and the domain to which they belong.

With regard to their life cycle, cookies can be:

- Persistent cookies, which reside in your device with Internet access for a given period of time.
- Session cookies are temporary and are deleted from your device with Internet access, when the browser is closed.

As for the domain to which they belong, cookies can be:

- First-party cookies, which are downloaded by the site you are visiting and share the same domain.

- *Third-party cookies.* They are downloaded into your device with Internet access by sites with a different domain from the one you are visiting. This can happen, for example, at websites that comprise third-party advertising banners.

Caixa uses similar cookies and technologies at its website [www.cgd.pt](http://www.cgd.pt) for the following purpose:

- **Analysis and Performance:** When you visit Caixa's website at [www.cgd.pt](http://www.cgd.pt), we download cookies, enabling us to positively identify your device. This way, we can record your individual visits to Caixa's website, analyse its performance and how users browse our site. We use this information to improve the service provided to users of our website.

Caixa does not use, at its website [www.cgd.pt](http://www.cgd.pt) advertising cookies or shares information with third-party websites.

Caixa's use of cookies must never allow identifying the user, as cookies are used solely for the purposes given under article 5(2) of Law no. 41/2004.

### **III. Managing cookies**

Users may accept, refuse or remove cookies by managing their browser settings, as they are always given the chance to change their permissions.

*Users can configure cookies under their browser's "options" or "preferences" menu.*

Should users choose to disable cookies, this could prevent some services from working properly, thus affecting their browsing experience, in whole or in part.

To manage the use of cookies, the procedures to be used should be consulted under the browser's help options.

### **IV. Updating Cookie Policy**

This Cookie Policy is revised from time to time by Caixa, as the contents thereof can undergo updates.