

# Privacy policy syncYD powered by YDIGITAL MEDIA

## 1. Commitment syncYD

syncYD is a product developed by YDIGITAL MEDIA, SA, a company specialized in digital marketing and advertising (hereinafter YDIGITAL MEDIA), in the context of its attributions, treats personal data, ensuring strict, effective and secure protection of all data daily collects and treats. Please read this Privacy Policy which describes how we treat your personal data and how you can exercise your rights as a holder of personal data processed by syncYD powered by YDIGITAL MEDIA.

## 2. The Data Controller and Data Protection Officer

In the scope of its activities and attributions, YDIGITAL MEDIA is the entity responsible for the collection and processing of personal data, which are processed and stored in an automated and non-automated way.

YDIGITAL MEDIA has a Data Protection Officer, who can be reached at [privacy\\_syncyd@ydigitalmedia.com](mailto:privacy_syncyd@ydigitalmedia.com). In particular, the Data Protection Officer is responsible for monitoring the compliance of the activities involving the processing of his /her data with the applicable legal and regulatory standards and is also the contact point between YDIGITAL MEDIA and the National Control Authority, as well as between YDIGITAL MEDIA and its customers and users in matters relating to the processing of personal data.

## 3. Personal Data, Holders of Personal Data and Personal Data Categories

### What are personal data?

Personal data is any information of any nature, collected on any type of medium, relating to a natural person, identified or identifiable. The set of information that may lead to the identification of a particular person, namely by reference to an identifier (such as an identification number or a location data), is identifiable.

### Who do we collect personal data from?

In the light of the attributions of YDIGITAL MEDIA, most of the data are processed from legal persons (companies and associations). However, in order to carry out its tasks, data of the following types of natural persons (non-exhaustive list) may be collected and processed:

- Clients /investors and their collaborators;
- Service providers and their collaborators;
- Job seekers and potential trainees;
- Individuals targeted by advertising or marketing campaigns.

### **What personal information do we collect and how do we collect it?**

YDIGITAL MEDIA only collects data that is appropriate, relevant and limited to what is necessary for the purposes for which it is processed. The collection of your data can be done orally, in writing (in particular through forms and contracts), as well as through the syncYD website. As a general rule, we directly collect your data.

For different purposes, we may collect the following types of personal data:

- identification data (such as name, naturalness, citizen's card or date of birth);
- contact details (such as mobile phone, address or e-mail);
- qualification data and professional situation (such as level of education and CV);
- bank, financial and transaction data (such as IBAN or tax identification number);
- location data;

As a general rule, syncYD powered by YDIGITAL MEDIA does not collect any special data, such as health data or criminal misdemeanour data.

## **4. Fundamentals and Purposes of the Treatment of Personal Data**

### **Why and on what grounds do we use your personal data?**

All data collected and processed by syncYD powered by YDIGITAL MEDIA are based on one of the following conditions of legitimacy

- **Consent:** When the collection is preceded by your express, specific and informed consent, through written support or, alternatively, via mobile web. We collect your consent, for example, for purposes related to subscribing to newsletters or for subscribing to actions or campaigns promoted by YDIGITAL MEDIA.
- **The execution of a contract or pre-contractual procedures:** when the treatment is necessary for the performance of a contract in which it is a party or for pre-contractual procedures. This condition will be fulfilled when we treat your data for the management of supply and service contracts.
- **The fulfilment of legal obligations:** when the treatment is necessary to fulfil a legal obligation. This includes, for example, the communication of data to public (national and Community), tax or judicial bodies.

### **What are the purposes for which we collect your data?**

Personal data collected by syncYD powered by YDIGITAL MEDIA is processed only 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 highlight the main purposes that justify the collection of personal data by syncYD powered by YDIGITAL MEDIA:

- Advertising and marketing campaigns;
- contracting of supply and service contracts;
- Disclosure of newsletters /publications;

## 5. Period of retention of personal data

YDIGITAL MEDIA treats and stores your data only for as long as is necessary to continue or complete the purposes of the processing, in compliance with the maximum periods required to comply with contractual, statutory or regulatory obligations.

In general, and where there is a contract that legitimizes the processing of your data, YDIGITAL MEDIA will keep such data for as long as this contractual relationship is maintained. Other circumstances exist, such as compliance with legal or regulatory obligations (for example, for the purposes of complying with tax obligations, personal data relating to invoicing must be kept for a maximum period of ten years from the date of the act) and pending legal proceedings, which may justify keeping your data for a longer period of time.

Once the storage period has expired, YDIGITAL MEDIA will delete the data.

## 6. Rights of data subjects

Under the terms of the legislation in force, as soon as we collect and process your data, there is a set of rights that you may exercise at any time with YDIGITAL MEDIA.

### What are your rights?

**Right of access** : a right that allows you to obtain information regarding the processing of your data and its characteristics (namely the type of data, the purpose of the processing, to whom your data can be communicated, storage periods and what data you have to provide mandatory or optional).

**Right of rectification**: right that allows you to request the rectification of your data, requiring them to be accurate and current, such as when they are incomplete or outdated. >

**Right to delete data or "Right to be forgotten"**: right that allows you to request the deletion of your data, when you consider that there are no valid grounds for data retention and there is another valid basis for such treatment (such as the performance of a contract or the fulfilment of a legal or regulatory obligation).

**Right to Limit:** right that allows you to suspend 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 in current use, that allows the re-use of such data. Alternatively, you may request the transmission of your data to another entity that is responsible for processing your data.

**Opposition Right:** a right that allows you to oppose certain purposes and provided that there are no legitimate interests that prevail over your interests. One of the examples of this right concerns opposition to direct marketing (marketing) purposes.

## **7. Data Transmission**

### **With whom do we share your personal information?**

Given YDIGITAL MEDIA's responsibilities, and depending on its purpose, your data may be shared with third parties, which include national public bodies and private entities for the purpose of fulfilling contractual obligations. Your data may also be accessed by service providers of YDIGITAL MEDIA, deemed necessary for the purposes described above, in particular as regards information security and archiving services. YDIGITAL MEDIA warrants that it will only use service providers who have the technical and organizational guarantees necessary to protect their personal data.

### **Transfers of personal data from outside the EEA**

YDIGITAL MEDIA may, exceptionally, transfer your personal data to third countries (outside the EEA - European Economic Area). In such cases, YDIGITAL MEDIA will ensure that data transfers are carried out in strict compliance with applicable legal standards.

## **8. Cookies Policy**

### **What are cookies?**

Cookies are small text files with relevant information that is downloaded by your access device (computer, mobile phone /smartphone or tablet), through the browser, when a site is visited by the user, being used for store information about user visits.

Cookies, depending on how long the user stays on the page, can be classified as session or permanent cookies. The first type of cookies expires when the user closes the browser. The second type of cookies expires when your goal is completed or when they are manually turned off.

The cookies used by YDIGITAL MEDIA on ydigitalmedia.com do not collect personal information that allows you to identify the user.

The cookies used on ydigitalmedia.com are:

- **Analytics** - collects information about users' browsing experience on the web page, anonymously, although sometimes they also allow a user to be uniquely and uniquely identified to gain insight into user interests in services provided by the website.
- **Advertising** - active persistently but for a limited period of time, in order to collect user information about Internet browsing habits so that the advertisement displayed by the user matches their needs and interests.
- **Third-party** -allow the site to remember browsing preferences, language, region, and collect user information to direct advertising to their interests.

The website ydigitalmedia.com uses cookies to collect statistical information, in order to analyze the operation of the site and the experience of browsing users, and evaluate the effectiveness of advertising and promotional campaigns.

### **Disable the use of cookies**

All browsers allow the user to accept, reject or delete cookies by selecting the appropriate settings in their browser. Thus, users can disable the use of cookies at the site portugalglobal.pt at any time by modifying the browser settings.

However, it is important to note that disabling cookies may prevent certain web services from working properly, affecting all or part of the navigation.

## **9. Legislation**

The processing of personal data of users and clients carried out by YDIGITAL MEDIA, as well as the sending of commercial communications carried out by electronic means are in compliance with the national and Community legislation in force, namely by the General Regulation of Data Protection.

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