

## Instituto de Telecomunicações' Privacy Policy

The purpose of this statement is to make known how Instituto de Telecomunicações (IT) handles the personal data it collects from all holders of such data and from those who visit our website or who, by any digital means, provide us with information.

This Privacy Policy applies exclusively to personal data for which IT is responsible for collecting and processing it.

### 1- Our commitment

The protection of privacy and personal data is a fundamental commitment of IT. Personal data is not property of institutions but rather of individuals, individually. In order to safeguard them, IT complies with the legal requirements in this matter, namely the provisions of Law no. n.º 67/98 from October 26, European Data Protection Law and Regulation (UE) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and from free circulation of such data.

The privacy of our employees and partners is an essential part of our concerns and we appreciate the trust you place in providing us with your personal data.

### 2- Responsible for Data Treatment and Data Protection

IT is the entity responsible for the collection and processing of personal data and decides which data is collected, means of treatment and purposes for which they are used. IT is committed to:

- a) Process your personal data in a lawful and loyal manner, collecting only the information necessary and relevant to the purpose for which it is intended;
- b) Allow you, as a data subject, to access and correct the information concerning you, transmitting them in clear language and strictly corresponding to the content of the register;
- c) Do not use the data collected for a purpose incompatible with that of collection;
- d) Keep the data accurate and, if necessary, current;
- e) Ensure the consent of the data subject under the terms of the legislation in force;

- f) Guarantee the right to delete data under the terms of the legislation in force;
- g) Respect professional secrecy in relation to the data processed;
- h) Limit personal data interconnections to the bare minimum;
- i) Have adequate protection and security measures implemented, which prevent the consultation, modification, destruction or addition of data by a person not authorized to do so;

IT does not have a Data Protection Officer (Data Protection Officer or DPO), however it has a process that ensures, among other things, data processing in accordance with current legislation, verifying compliance with this Privacy Policy. Privacy. IT also guarantees cooperation with the supervisory authority, provides information and advises the controller on its obligations in terms of privacy and data protection.

### 3- Personal data, holders of personal data and categories of personal data

- a) What is personal data?

Personal data means any information, of any nature and regardless of the respective support, relating to an identified or identifiable natural person. A person who can be identified directly or indirectly is considered identifiable, namely by reference to an identification number or to one or more specific elements of their physical, physiological, psychological, economic, cultural or social identity.

- b) Who are the holders of personal data?

Employee, Collaborator, Student, Contact, Visitor or natural person to whom the data relates and who for any reason has placed the data in the custody of IT.

- c) What categories of personal data do we collect, how do we collect them and how do we handle them?

IT may collect, store and use the following types of personal data:

- i. Information from employees, the data strictly necessary for the activity of IT and its relationship with the official entities with which it relates are requested, such as: name, address, cc, passport, qualifications, NIF, marital status etc.. .

- ii. Information for the purpose of sending information from the IT, registration in the general communication database. The data, requested and collected by completing an online registration form, in accordance with the protection and security measures implemented by IT, such as: name, title, telephone, email;
- iii. Any other information that, as a data subject, you choose to provide, for example, in the course of research projects with interaction with the public, the personal data provided may include, but not only:
  - Contact details; Professional data; Demographic data;
  - Information on technology preferences;
  - Data relating to the use of systems and methods being tested in the project.

The provision of incorrect or inaccurate data is the sole responsibility of the person providing them, as the data subject.

If you wish to correct any of these data, you can do so by contacting IT via email: [data.pessoais@av.it.pt](mailto:data.pessoais@av.it.pt).

## 4- Basis, Purposes and Duration of Personal Data Processing

- a) On what basis can we process your personal data?

The processing of personal data is only lawful if and to the extent that at least one of the following situations occurs:

**Consent:** When, as a data subject, you have given us your express consent, in writing, orally or through the validation of an option, and prior and if that consent is free, informed, specific and unambiguous for the processing of your personal data. for one or more specific purposes. Where reasonably possible or required by applicable law, we will obtain your consent before collecting or using your personal data.

**Compliance with contractual obligations and pre-contractual steps:** When the processing of personal data is necessary for the fulfillment of contractual obligations to which the data subject is a party, or for pre-contractual steps at the request of the data subject, such as for recruitment processes.

**Compliance with legal obligations:** When the processing of personal data is necessary to fulfill a legal obligation to which IT is subject, such as the communication of identification data to police, judicial, tax or regulatory entities.

**Defense of vital interests of the data subject or another natural person:** In the event that the data subject is physically or legally unable to give consent.

**Exercise of functions in the public interest:** When the processing is necessary for the exercise of functions in the public interest or for the exercise of the public authority vested in the controller.

b) For what purposes do we process your personal data?

IT can collect data for three different purposes:

- i. Employee data, intended to facilitate the performance of IT administrative and management activities, responding to the legal requirements arising from its activity and from the contracts with employees. IT makes public the photo, name and institutional email of all employees.
- ii. External communication data, database of individuals, to which IT sends information on a regular basis, in these cases the personal information collected is intended exclusively for this purpose, sending information.
- iii. Personal data collected within the scope of research projects, these data are anonymized and for the exclusive use of the purpose for which they were collected.

c) 3. How long do we process your personal data?

Whenever there is no specific legal obligation, personal data are processed by IT only for the period of time necessary to achieve the defined purpose.

## 5- Rights of the data subject

Under the terms of the applicable legislation, as a data subject, you have the right of access to the data concerning you, being able to request its rectification or addition, by contacting IT, through the email [dados.pessoais@av.it.pt](mailto:dados.pessoais@av.it.pt)

As a data subject, you can also, at any time, object to their treatment under the terms of the legislation in force.

## 6- Subcontractors, Communication and Transfer of Personal Data

IT, within the scope of its activity, uses subcontractors for all or part of the maintenance of the applications and systems where the data are stored, and takes the necessary measures to ensure that these entities are reputable and offer security guarantees, with strict compliance with data protection legislation, requiring a declaration of commitment.

## 7- Protection measures

IT has implemented the appropriate, necessary and sufficient logical, physical, organizational and security measures to protect personal data, namely:

- a) Firewall and intrusion detection system
- b) Means of data protection from conception (“privacy by design”) and, also, a set of preventive measures favorable to privacy (“privacy by default”)
- c) Audit and control mechanisms to ensure compliance with Security policies
- d) All employees are covered by a confidentiality agreement or subject to confidentiality rules, within the scope of the employment relationship with IT, regarding the data to which they have access within the scope of the operations of the respective computer base, being duly informed of the importance of the compliance with this legal duty of confidentiality and being responsible for complying with this obligation of confidentiality.