

Privacy Policy

1. Identification:

Company **Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A**

GDPR **General Data Protection Regulation**
Regulation (EU) 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 on the free movement of such data

Data Protection Officer _____

GDPR Compliance Registration of all systems and contexts in which personal data are processed by the company.

2. Introduction

- a. This policy applies to all personal data processed by [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#)
- b. This policy applies to all employees and partners and any third parties that have or may have access to personal data processed by [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#)
- c. The Data Protection Manager will assume responsibility for the continued compliance of the [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) with this policy.

3. Principles related to the processing of personal data

A [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) is committed to the processing of personal data in accordance with the requirements of the GDPR.

Article 5 of GDPR requires that personal data are::

- a. Processed lawfully, fairly and in a transparent manner in relation to the data subject;
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89, not be considered to be incompatible with the initial purposes;
- c. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

4. Lawfulness, Loyalty and Transparency in data processing

- a. To ensure that data processing is carried out in a lawful, fair and transparent manner [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) maintains a GDPR Management System.
- b. A [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) has an obligation to ensure that personal data is kept accurate and up to date. When necessary, considering the legal basis under which the data are processed, measures will be taken to ensure that the data is kept up to date.
- c. Data owners have the right to access, rectify, port and delete their personal data. They also have the right to limit the treatment and submit a complaint to the supervisory authority, the National Data Protection Commission (CNPD).
- d. Any requests made to [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) must be dealt with in a timely manner.

5. Legitimacy for data processing

- a. The processing of data must be carried out according to one of the following legal grounds: consent, performance of a contract, fulfillment of legal obligation, defense of vital interests, exercise of functions of public interest or legitimate interests.
- b. [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) will register the legal basis applicable to each data processing.
- c. When consent is invoked as a legal basis for data processing, evidence of consent must be maintained with personal data.
- d. When communications are sent to data owners, based on the consent that was given, the option to revoke this consent must be clearly available and the GDPR management system must ensure that this revocation is accurately reflected in the database of [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#)

6. Data minimization

- a. **Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A** guarantees that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which is collected.
- b. As part of its activity, it collects data with the following purposes:
 - As an employer, collects, treats and saves personal data of employees, contractors, consultants and job seekers.
 - As part of its commercial activity:
 - i. In the promotion and development of internal projects, it collects, treats and keeps personal data of the contacts.
 - ii. In the development of partnerships with third parties, with the purpose of streamlining training projects, business consultancy and service provision: it collects, treats and preserves personal data of customers and employees of its customers;

7. Data Recipients

- a. All professionals and partners must avoid any inappropriate disclosure of personal data and comply with general confidentiality duties.
- e. The data may be disclosed to third parties when we have a legitimate reason to do so or when the third party is processing data on our behalf, the contractual relationship being regulated by contract in which the security and treatment organization measures are defined and in which specifies that it only acts upon the instructions **Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A.**
- b. Data may also be disclosed if necessary to to comply with a legal obligation, statute or court order; with the purpose of obtaining legal advice; under or for the purpose of exercise or defense of legal claims or when necessary to defend a legal right; or to safeguard national security.

8. International Data Transfer

Data will not be transferred outside the European Union.

9. Personal Data Retention

- f. To ensure that personal data is kept for the time strictly necessary for the purpose of its processing, **Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A** adopted a Data Retention and Disposal Policy for each process and every personal data that is processed.
- a. The Retention and Disposal Policy considers which data should be kept, for how long and why.

10. Security

- g. [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) maintain data security by protecting the confidentiality, integrity and availability of personal data.
- a. To ensure data security, it adopted technical and organizational measures to prevent unauthorized use or access, modification, unlawful or accidental destruction and accidental loss, backup copies and disaster recovery procedures.
- b. Access to personal data is controlled and restricted to professionals who need access to it, in accordance with the Information Security Policy, and appropriate security measures have been adopted to prevent unauthorized sharing of information.
- c. The data deletion is made securely, so that data is unrecoverable.

11. Data breach

- a. In the event of a security breach that leads to accidental or illegal destruction, loss, alteration, unauthorized disclosure or access to personal data, [Libertas – Sociedade Gestora de Organismos de Investimento Coletivo, S.A](#) assess the risk to the rights and freedoms of data subjects and, if appropriate, report this violation to CNPD (National Data Protection Commission).

POLICY END