

1. The protection of privacy and personal data is a commitment of WIZ

The protection of privacy and personal data is a fundamental commitment of Wiz Serviços de internet, Lda. (WIZ), to the holder of personal data (also, "proprietor") that uses digital platforms and WIZservices.

With the application of the new <u>General Data Protection Regulation (GDPR)</u>, as of May 25, 2018, WIZ has stated that it remains strongly committed and committed to the protection of the privacy and personal data of its owner that uses the digital platforms and WIZ services and to this extent update its Privacy Policy in accordance with all data protection principles and standards that underpin the GDPR.

In this document, we seek to explain what personal data we collect, what purposes we can use, how we treat them, who we share them with, how long we keep them, and how to contact us and how to exercise our rights.

The WIZ suggests and invites browsing of pages dedicated to privacy and protection of personal data, which updates will be available on digital platforms WIZ.

2. General Regulation on Data Protection

The new GDPR lays down rules concerning the processing by a person, company or organization of personal data relating to persons in the European Union (EU).

GDPR protects personal data irrespective of the technology used for the processing of such data, the protection is technologically neutral, and applies to both automated and manual processing, provided the data is organized according to pre-defined criteria (for example, in alphabetical order). Also irrelevant is the way data is stored, in a computer system, via video surveillance, or on paper; in all these cases, personal data are subject to the protection requirements of the GDPR.

3. Who is responsible for data processing?

Wiz Serviços de Internet, Lda. (WIZ), headquartered in Rua Luz Soriano, 67, $10t^{\circ}$, 1200-246 Lisboa, legal person 504 596 357, is responsible for the processing of personal data under the GDPR.

4. Treatment of personal data, scope and amendment of the Privacy Policy

By providing your personal data to WIZ, the holder of personal data will consent to it being treated in accordance with this WIZ Privacy Policy.

This Privacy Policy applies to data that has been directly provided by the respective owner or collected in accesses of the holder to digital platforms and WIZ services. This ensures that digital platforms and WIZ services have links to other digital platforms and refer to third-party content that is not covered



by WIZ's Privacy Policy, so it is advisable that whenever the owner of personal data on those platforms is informed of the content of their privacy policies as well as the applicable terms and conditions.

The WIZ reserves the right to change its privacy policy, and therefore we advise the consultation of this document. If the Privacy Policy changes, we will post a notice on our digital platforms.

5. What type of information does WIZ collect?

The WIZ collects two kinds of information: personal information and anonymous information. Anonymous information occurs while the holder of personal data visits the digital platforms and aims to improve the operation of the same, including the management and prioritization of content. Personal information is voluntarily provided by the holder of personal data at the time of the voluntary registration. All data collected is processed automatically, and the information collected from the holder of personal data is encrypted and managed with advanced security.

The registration is for the holder of personal data access to subscription services for WIZ newsletters, comments and other functionalities provided by WIZ.

In order to provide certain services, WIZ may have to make personal and anonymous information available to third parties. This will only happen, however, in these specific circumstances:

- a) With the express consent of the holder of personal data;
- b) When in good faith we believe it is required by law:
- c) When in good faith we believe that it stems from contractual stipulation;
- d) When in good faith we believe it necessary to protect our rights or property;
- e) When there is a transfer to a successor or buyer, in a merger, acquisition, liquidation, dissolution or sale of assets.

The consent of the holder of personal data shall not be required for disclosure in the situations referred to in points b) to e). In any event, we will attempt to notify you to the extent permitted by law.

6. What is personal data?

Personal data is information relating to an identified or identifiable person. An identifiable person is a person who can be identified directly or indirectly. Also personal data is the set of distinct information that may lead to the identification of a particular person.

Examples of personal data:

Name and Nickname; Address; E-mail address;



Number of an identification card;

Location data (for example, the location data function in a mobile phone); IP address (internet protocol);

Cookies;

Your phone's advertising identifier;

Data held by a hospital or doctor, which unequivocally identifies a person; Sound or image.

7. Who is the holder of personal data?

The holder of personal data is the natural person to whom the data relate and who has used digital platforms and WIZ services .

8. Categories of personal data

Examples (not exhaustive):

TYPES	DATA
Main Identifiers	Name, Civil or fiscal identification number, Passport number, date of birth, marital status, address, telephone number, e-mail address, nationality, photos and files of the mobile device, household data, data related to kinship.
Additional Identifiers	IBAN, geo-location, educational level, gender, occupation, socio-economic data, personal ID, IP address, social network addresses, mobile device type, operating system, operating system version.
Special protection	Personal data of children under 16 years.

9. For what purposes does WIZ treat your personal data?

Examples (not exhaustive):

PURPOSES	DATA PROCESSING
Digital platforms	Analysis of browsing profiles, adaptation and development of new products, content or information services (notifications, newsletters, digital platforms and informative dossiers and content apps).
Content Development	Analysis of navigation profiles, products, adaptation and development of new products, contents or services.
Engineering, Systems and Technology	Technical responses and complaints.
Commercial	Participants in contests or competitions, prize giving.
Marketing and Communication	Users of digital platforms and WIZ services.
Institutional Relations	Registration of guests and visitors, sending invitations.



We will request your express consent before using the information for purposes other than those expressly set forth in this Privacy Policy.

10. When and how do we collect your personal data?

We collect personal data in particular when participating in WIZ content (hobbies, etc.) Or purchase products or services WIZ, WIZ services and applications, by telephone or email. The collection can be done orally, in writing or through digital platforms.

11. What is the basis for the processing of your personal data? Consent

Your consent must be expressed - in writing, orally or through the validation of an option - and prior, provided in a free, informed, specific and unambiguous manner.

or

Specific: consent by minors (16 years)

In the case of the processing of personal data of minors who may be subject to prior consent, WIZ will require consent from the holders of parental responsibilities, in particular for participation in hobbies.

Contract execution and pre-contractual procedures

When the processing of personal data is necessary for the execution, execution and management of a contract with WIZ, such as for the acquisition of archival contents; or

Compliance with legal obligation

Where the processing of personal data is necessary to comply with a legal obligation to which WIZ is subject, such as the communication of identification or traffic data to law enforcement, judicial, tax or regulatory authorities or location data to ensure emergency services; or

Legitimate interest

The processing of personal data by WIZ may be justified on grounds of legitimate interest related to the performance of the tasks related to its activity as a company, such as data processing to improve quality of service, fraud detection and protection of revenue and when our reasons for using it should prevail over your data protection rights.

12. How long does WIZ treat and retain your personal information?

The WIZ comes and saves your personal data according to the purposes for which they are accounted for and only for the time necessary to fulfill the purposes for which it was collected and conservation, and always in accordance with the law, guidelines and decisions of the CNPD, or, whichever is applicable, until you exercise your right of opposition, right to be forgotten or withdraw consent.



There are situations in which the law determines the retention of data for a minimum period of time, namely: for one year, traffic and location data for the purpose of investigation, detection and prosecution of serious crimes or for 10 years the data necessary for information to the Tax Authority.

WIZ will delete or anonymize the data after the respective storage period has expired if it is not to be stored for a different purpose that can be maintained.

13. Rights of the holder of personal data

The holder of personal data has rights to information, access and rectification or erasure of personal data and the right to portability of data, the right to limit or oppose the processing of their data, within the scope and under the terms of the GDPR and other applicable legislation .

The holder may withdraw, at any time, the consent that he has given for the processing of his personal data, within the framework of the GDPR. The revocation of consent shall not affect the lawfulness of the processing of personal data hitherto made, based on the consent you have previously provided.

You also have the right to complain about the processing of your data to the CNPD.

Exercise your rights through the following contacts:

Email

info @ wiz .pt

Letter

Wiz Serviços de internet, Lda. (WIZ) In Charge of Data Protection Officer Rua Luz Soriano, 67, 1º Dto. - 1200-246 Lisbon - Portugal

The exercise of rights is free of charge, except in the case of a manifestly unfounded or excessive or unjustifiably reiterated request, in which case a reasonable fee may be charged against costs.

Replies to requests shall be made without undue delay within one month of receipt of the request, unless it is a particularly complex request or occurs in exceptional circumstances. This period may be extended by up to two months, where necessary, taking into account the complexity of the request and the number of applications received.

In the context of your request, you may be asked to prove your identity so as to ensure that the sharing of personal data is only done with its owner.

14. Transmission of personal data



Personal data may be transmitted to subcontractors for processing in the name and on behalf of WIZ. In this case, WIZ shall take the necessary contractual measures to ensure that subcontractors respect and protect the personal data of the holder.

Data may also be transmitted to third parties - entities other than WIZ or subcontractors - such as companies within WIZ, companies with which WIZ develops partnerships, if the holder has consented - or entities to whom the data must be communicated under the law, such as the Tax Authority, judicial authorities, criminal police agencies, among others.

The WIZ may have to occasionally transfer your personal data to a third country outside the EU's borders and not part of the list of countries that the EU already considered together levels of protection appropriate personal data. In such cases, WIZ will ensure that data transfers are performed in strict compliance with applicable legal standards.

15. Responsibility for digital platforms and WIZ and third party services

On the use and processing of personal data of digital platforms WIZ, see, please, the **Cookies** Policy WIZ.

The WIZ is not responsible for the content accessed through any link that takes the holder of personal data to sail out of the digital platforms WIZ and the processing of personal data carried out in these, where such links are by third parties. The websites and content of third parties are not subject to this Privacy Policy, so we advise that whenever you browse these sites, look for and read the privacy policies, as well as the applicable terms and conditions.

16. What security procedures guarantee the protection of your data?

The WIZ take all necessary precautions and are legally required to ensure the privacy of personal data processed and / or transmitted through its digital platforms. These precautions ensure online and offline security of this information.

Whenever sensitive information is collected or used, the data will be encrypted using the SSL protocol. This so-called Secure Socket Layer technology is used to improve the security of data transmission over the Internet, encrypting and protecting sensitive data and information using the HTTPS protocol. SSL guarantees the holder of personal data that the data will not be fraudulently intercepted and that all information is treated with the utmost security.

18. Doubts?

If you have any questions about any of the topics covered in this document, please contact us to:

Email

info @ wiz .pt



Letter

Wiz Serviços de internet, Lda. (WIZ) In Charge of Data Protection Officer Rua Luz Soriano, 67, 1º Dto. - 1200-246 Lisbon - Portugal

Last updated: May 24, 2018.

General Data Protection Regulation (GDPR): 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 and repealing Directive 95/46 / EC (General Data Protection Regulation) (OJ L 119, 4.5.2016)