

# Privacy Policy

## INTRODUCTION

A COSEC – Companhia de Seguro de Créditos S.A., (COSEC), with Head Office in Lisbon, VAT Number and Register Number at Lisbon Commercial Registry 500 726 000, with the Capital of € 7.500.000,00, is an insurance company in the areas of credit and bond insurance, providing its services to other companies (B2B) to help customers to develop their business safely and the domestic and foreign trade.

At COSEC we care about your personal data. This Privacy Policy explains the kind of personal data we collect, how and why we collect and use it and for how long it is kept. We also explain how the data subject can access, correct, or object to the processing of his personal data (including requesting deletion, subject to applicable laws and regulations).

## 1. GENERAL INFORMATION

This section pertains to customers, brokers, agents, candidates for job vacancies, as well as individuals who are just visiting our *websites*.

### 1.1 Is COSEC a “data controller”? What does it mean?

Yes, COSEC is the legal entity that, alone or jointly with others that assists COSEC in the provision of the services inherent to its activity, determines the purposes and means of processing of personal data regarding the credit and bond insurance services who is entitled to practice, as defined by the applicable laws and regulations (namely UE’s General Data Protection Regulation). This means that COSEC is the legal entity in control of the personal data it collects and it’s required by law to ensure policies, processes and procedures in place to safeguard the data and respect the rights of the individuals whose data is collected.

### 1.2 What kind of personal data is collected by COSEC?

Depending on what information the data subject provides or preferences he selects, COSEC may collect the following categories of personal data:

- Data provided by the individuals, e.g., when signing up our services and products, like names, email address, telephone number, job title, company name, or when a job vacancy application is voluntarily submitted;
- When our *websites* are visited, we collect information about the visitor by using *cookies*. A *cookie* is a small piece of data that is stored in the access device and allow us to re-identify the *browser* when the data subject visits our site again. We use *cookies* to provide user-friendly, safe and effective websites and to tailor our services to the data subject needs and interests, e.g., by customizing your browser experience or delivering advertisement targeted to you (which can be from a third party). For more information, see our Cookies Policy in force, accessible at [www.cosec.pt](http://www.cosec.pt).
- Information we obtain from third parties (e.g. information services providers) or publicly available sources (e.g. commercial register).

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### 1.3 For which purposes and on which legal basis the personal data is used?

- **Consent to,**
  - provide, maintain, improve, and develop our services and tailor them to the data subject needs and interests (e.g. to offer you customized advertising)
  - Communicate with the data subject;
  - Inform and advise the data subject on COSEC's products (e.g. by sending advertisements).
  - Collect or consult sole trader's information at Banco de Portugal Central Credit Register (CRC).
- **Preparation and performance of contracts to:**
  - Prepare offers for one of our products, deliver our services to you and fulfill our mutual contractual obligations
  - Set up and maintain user accounts, for technical support or for other related purposes.
- **Legitimate Interest to:**
  - Provide, maintain, improve, and develop our services and tailor them to the data subject needs and interests (e.g. to offer you customized advertising)
  - Enhance the security of COSEC's IT-systems for the benefit of all our users
  - Communicate with the data subject.
- **Compliance with legal obligations to:**
  - comply with law enforcement requests from authorities, as legally required or permitted, response to court decisions or administrative determinations, judicial or regulatory, or where it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or violations of our policies.

If the data is used for any other purpose than described in this Policy, the data subject will be informed about such other purpose and it will be obtained his consent where required.

### 1.4 Where the personal data is processed?

The personal data collected may be processed both inside and outside of the European Union ("EU") and the European Economic Area ("EEA"), subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose your personal data to parties who are not authorized to process them.

Note that EU/EEA Member States and other countries all have different laws regarding the protection of personal data. When your personal data is transferred from your own country to another country, the laws and rules that protect your personal data in the country to which your information is transferred to may be different (or less protective) from those in your country of residence. For example, the circumstances in which law enforcement can access personal data may vary from country to country.

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Whenever we transfer personal data for processing outside of the EEA, we will implement effective transfer mechanisms (e.g. Contractual Clauses) to ensure an adequate level of data protection.

### 1.5 For how long do we keep the personal data?

We will not retain your personal data longer than necessary to fulfil the purposes for which it was collected for or to fulfil legal obligations, or as permitted by law, e.g. to defend ourselves in legal claims. Afterwards, we will delete the personal data. The individual retention periods depend on the type of personal data and the purpose of its processing.

### 1.6 What are the data subject rights in respect of his personal data?

To the extent permitted by applicable data protection laws and regulations, the right to:

- Access the personal data held about the data subject, including information such as, for example, the source and the categories of the data, the purposes of the processing, the recipients (or categories thereof) and the respective retention period;
- Request the update or correction of the personal data so that it is always accurate;
- Obtain the personal data in an electronic format for the data subject or for another controller;
- Request the deletion of the personal data if it is no longer needed for the purposes for which they were collected or otherwise processed;
- Restrict the processing of the personal data in certain circumstances, for example, where the accuracy of the personal data was contested by the data subject, for the period enabling us to verify its accuracy;
- Object to the processing of the personal data on specific grounds relating to the data subject situation that overrides COSEC's compelling legitimate grounds for the processing;
- Withdraw the consent at any time where the personal data is processed with consent, without affecting the lawfulness of processing based on consent before its withdrawal or where there is another legal basis for processing the data (e.g. overriding legitimate interests).
- File a complaint with the data controller and/or the relevant data protection authority
- These rights may be exercised by contacting COSEC and providing your name and email address as well as the purpose of the request according to the form that will uphold and facilitate the right of access by the data subject. Access the form [HERE](#).

## 2. WEBSITES

### 2.1 – How does COSEC collect data on *websites*?

COSEC collects only the personal data that were voluntarily provided by the data subject on online forms or in accordance with your consent to the preferences of *cookies* selected when accessing our websites for the first time. You have the right to withdraw your consent at any time, and if you do so, we will discontinue the processing of your data collected on this website. You can withdraw your consent by changing your cookies settings in the access browser and then [HERE](#).

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### 2.2. Cookies

A cookie is a small piece of data that is stored on your access device (computer, smartphone or tablet) through the browser when you visit a website or when you use online services and allows the website to "remember" your actions or preferences over a certain period.

We use cookies to ensure the proper function of our website and to facilitate your access to it by collecting information on your device and preferences (e.g. your device and your browser). Additionally, we collect information on how you interact with our and our partners' services, like advertising services. You will need session cookies to use our websites and, in principle, you can also use our websites without persistent and third party cookies. If you want to use our website fully and conveniently you should accept cookies. You can change your cookie settings, e.g. to withdraw your consent for persistent and third party cookies, at any time [HERE](#).

#### There are several types of cookies:

(a) Session Cookie (or "temporary cookie")

A session cookie allows us to store your action during your browser session (e.g. your log-in data). Session cookies are erased when you close your browser or exit our website.

(b) Persistent Cookie (or "tracking cookies")

A persistent cookie is stored on your device in between browser sessions. These cookies help us to remember your preferences or actions every time you visit our website until the expiry date of the cookie. These cookies are also used to keep you logged on to our website. As soon as the cookie is deleted, you need to enter your log-in credentials again.

(c) Third-Party Cookie

These cookies are set by a third party separate from our website, for example to provide advertisements like banners for third-party products or social media buttons.

Name of cookie	Usage	Storage time	Type of cookie
Google Analytics	Cookies to differentiate between users and to gather information about the use of the website.	2 years	Third party cookie
osVisitor	Cookie to improve user experience, without which the website may not work properly	Always	Persistent cookie

### 3. THIRD PARTIES

To provide the services contracted by our customers, COSEC collects information on commercial entities and similar entities, including sole traders, to assess and monitor our own risks and to collect

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debts. This collection may be carried out using third parties, through information available publicly or disclosed by the owner himself.

COSEC collects data on:

- **Commercial entities:** trade sector, name, names of the representatives (e.g. directors, board members) and information on its creditworthiness (e.g., payment and risk incidents);
- **Sole traders or other similar entities:** name, address, e-mail address, trade sector, legal form, names of the representatives (e.g., directors) and information on its creditworthiness (e.g., payment and risk incidents).

### 4. HOW CAN YOU CONTACT COSEC?

You can contact us at [privacidade@cosec.pt](mailto:privacidade@cosec.pt).

### 5. HOW OFTEN DO WE UPDATE THIS PRIVACY NOTICE?

This Privacy Policy is regularly reviewed. We will ensure the most recent version is available here. This Privacy Policy was approved on the 18th October 2018.