

PRIVACY POLICY

Whereas:

- **Magellan** is strongly committed to compliance with the General Rules on Data Protection (GDPR), seeking to ensure a demanding level of personal data protection, reinforcing the pre-established trust relationship with the data subjects.
- The **Privacy Policy** adopted by Magellan demonstrates the inherent importance of the collected personal information, ensuring proper transparency regarding its treatment, intended purposes, data sharing, data retention period or criteria applied, as well as the identification of the rights of data subjects.
- The **principles and the rules** relating to Magellan's Privacy Policy aim to ensure a high level of transparency and information regarding the treatment given to personal data.

Magellan adopts the Privacy Policy identified below, which may be revised or updated, always from the perspective of achieving the identified objectives in the best possible way.

Rules and Principles regarding Magellan's Privacy Policy

1- Identification of the Entity Responsible for the Data Treatment:

Magellan - Associação para a Representação dos Interesses Portugueses no Exterior

Avenida da Boavista, 1588 7.º, 4100-115 Porto - Portugal

VAT Number: 509268943

2- Identification, purposes for the collection and processing of personal data:

2.1. Commercial purpose and promotion of Magellan's activities.

- The collected personal information consists of identification (name) and contact (email address and phone number), and may include the respective address.
- The purpose of the collection and the treatment of data aims to inform and communicate with the data subject about the activities developed by Magellan, about its projects, to send newsletters or other online publications, invitations

and registration for events, training actions, projects and programmes of national or European funding, constituting the legal basis in the processing of the consent of the data subject.

- The collected and processed personal data are only those required for the fulfilment of this purpose.
- In the event it is necessary to collect additional personal data, Magellan is committed to seek the consent of the data subject and provide the necessary information for understanding the reason behind it and subsequent treatment conditions.

2.2. Pre-contractualisation purpose.

- Personal data required for the recruitment of Magellan's employees will have, as a legal basis, the pre-contractual arrangements necessary and due diligence for the analysis of the respective job applications.

2.3. Contract celebration/implementation purpose.

- Personal data required for the celebration and implementation of contracts shall be the legal basis for the execution of the contract.

3- Timeline for data retention.

- 3.1. Personal data shall be kept strictly for the period necessary for the referred purposes or during the period necessary for the fulfilment of legal obligations, when required.
- 3.2. With regard to the commercial purpose and promotion of Magellan's activities, the conservation period starts from the moment of consent acknowledgment and will end at the time in which the cancellation of the subscription occurs.
- 3.3. Personal data relating to the recruitment process will be kept for the period of two years from the submission of the application or of the CV should the candidate not to be hired; for the remaining cases the personal data shall be kept for the period of duration of contracts and of compliance with other legal obligations.

4- Recipients, subcontractors and third parties.

4.1. Personal data are not disclosed or made available to third parties.

4.2. Magellan may resort to subcontracted entities and, in the framework and for the purposes of such subcontracting services, these may have access to personal data, which thus proceed to the processing of such data on behalf of and in representation of Magellan. It shall be up to Magellan to adopt the contractual and procedural measures necessary for the subcontractors to guarantee the respect and protection of the used personal data. The subcontractor shall deal solely with the data for the established purposes, strictly complying with the legal rules on the protection of personal data, information security and other applicable standards.

5- Rights of the data subject.

5.1. Magellan is committed to ensuring the respect for the rights of personal data subjects, in particular:

- the right to be informed: the data subject may obtain confirmation of the personal data that is the subject of treatment, as well as the copy of the personal data in the treatment phase.
- the right to rectification: the data subject may request the rectification of its personal data which are inaccurate, as well as complete the personal data which are incomplete.
- the right to erasure: the data subject has the right to require the suspension of treatment or limitation of treatment to certain data categories or for certain specific purposes.
- the right to data portability: the data subject may receive the provided data in a digital format of current usage and automatic reading or to request the direct transmission of its data to another entity, that will become the new responsible for their personal data.
- the right to object: the data subject may obtain the deletion of his personal data, provided that there are no valid grounds for its preservation.
- rights related to automated decision-making including profiling: the data subject may, at any time, object to the processing of data under the applicable law. If you withdraw your consent, personal data will be removed from Magellan's files and will not be subject to any subsequent use.
- the right to fill a complaint, in the terms of the applicable legislation.

5.2. Without prejudice to the compliance with legal or contractually determined obligations, the data subject may exercise the abovementioned rights, in particular

to access, rectify, withdraw consent or oppose the processing of his personal data, by sending an email to geral@magellan-association.org or a letter to the following address:

Magellan - Associação para a Representação dos Interesses Portugueses no Exterior

Avenida da Boavista, 1588 7.º, 4100-115 Porto - Portugal

5.3. The exercise of the rights is free, excluding from exceptional cases arising from excessive requests in which a fee may be charged to support the inherent costs. The answer shall be provided within 30 days of reception of the application, excluding exceptional circumstances.

6- Security and confidentiality.

6.1. Magellan commits to ensure the safety and confidentiality of personal data collected within the standards required by best practices.

6.2. Magellan requires its employees and subcontractors to strictly comply with the strict safety standards of communicated personal data, and may not use such data for any other purposes other than those previously defined.

Final information:

- Magellan may, at any time, update this Privacy Policy.
- Thus, we request that you review this document periodically to stay up to date.

You can contact Magellan on all matters concerning the processing of personal data and exercise your respective rights through the following contacts.

geral@magellan-association.org

or

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Last Updated: October 2018.