



PRIVACY POLICIY

Document Reference | PL04_PP_V3



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1. References	General Data Protection Regulation 2016/679, of 27 April 2016 Decree-Law No. 242/2012, of 7 November Law No. 25/2008, of 5 June Decree-Law No. 91/2018, of 12 November
2. Associated Documents	PL01 – Communication Policy PL05 – Security Policy
3. Distribution List	All PAYPAYUE staff, customers, users and other interested parties
4. Document History	07-06-2018 Version 1 03-01-2019 Version 2 24-05-2019 Version 3
5. Document Classification	D Public

6. Version Record

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	24-05-2019	24-05-2019	
3	Compliance	Leadership	Update according to DL No. 91/2018
	Inês Sousa	Tolentino Pereira	



7. Policy Purpose

The purpose of this policy is to define the way in which the data supplied by the users of the PAYPAY platform is treated and used, as well as all the personal data of the staff.

Also, this policy represents the commitment of the leadership of PAYPAY to comply with the principles of data processing and the rights of its owners, in accordance with the provisions set forth in Regulation (EU) 2016/679, General Data Protection Regulation, hereinafter referred to as "RGPD" in the organizational context.

8. Risks and Implications

The disclosure of personal data, as defined in this Policy, is subject to the terms established by the legislation of the Portuguese Republic and by European legislation.

Infringements of the provisions established in the GDPR "(...) shall be subject to administrative fines up to 10 000 000 EUR, or in the case of an undertaking, up to 2 % of the total worldwide annual turnover of the preceding financial year (...)" (Article 83 of the GDPR).

9. Policy Scope

This policy applies to all personal data, being considered as personal data:

- "all information, of any nature and independent of its respective support, including sound and image, about an identified or identifiable natural person";

- "(...) any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person". (GDPR, Art. 4).

As provided in article 2 of the GDPR, this policy applies to "(...) the processing of personal data wholly or partly by automated means and to the processing other than by automated means of personal data which form part of a filing system or are intended to form part of a filing system".

10. Purpose of data processing

The data collected is intended to:

- The registration on the platforms, by completing the respective forms;
- The implementation of the use contract, including the use of the platform, invoicing, satisfaction questionnaires and communications with customers;
- Statistical analysis;
- Processing of information/support requests and eventual claims;
- Marketing, by sending newsletters on promotions, campaigns and new functionalities.



The processing of the data collected is intended to guarantee its customers the highest levels of service excellence and to continually improve the ability to meet their needs.

The data collected in the forms on the websites will be used to process user requests and will not be used for any other processing. In case you do not authorize the processing of your data, we will not be able to accept your registration.

In accordance with the content of Article 136 of DL 91/2018, payment institutions that operate as payment providers are "allowed to process personal data by payment systems and payment service providers to the extent that they demonstrate that it is necessary to guarantee the prevention, investigation and detection of payment fraud". However, it should be taken into account that, in accordance with the provisions of number 3 of the aforementioned article of DL 91/2018, "Payment service providers only have access to the personal data that is necessary for the provision of their payment services, and only process and store the data with the express consent of the user of the payment services to which that data refers".

11. Responsibilities

The *Compliance* and the Data Protection Officer (DPO) are responsible for the definition and implementation of this policy.

The Data Protection Officer (DPO) guarantees, among other things, the conformity of data processing with current legislation and proceeds to verify compliance with this Data Protection Policy.

All PAYPAY staff is responsible for compliance with the established regulations, as well as for communicating to the Compliance and the DPO any anomaly or breach of this Policy and of data protection.

Also, the DPO will collaborate with the National Commission for Data Protection (*Comissão Nacional de Protecção de Dados -CNPD*) "(..) at request of the latter, in the performance of its functions", particularly in matters related to the processing of the data kept by the company and considered to be sensitive.

12. Rights of the data owners

In accordance with current legislation, the data owner is guaranteed: the right to access, update, rectify or delete his/her personal data, at any time, as well as to object the use of the data provided for marketing purposes. To do this, the user must send a request to the contacts indicated on the websites of the different platforms of the PAYPAY Group. In the event that the user considers that his/her data is not being processed in accordance with applicable legislation, has the right to file a claim with the CNPD.

To exercise your rights, you can contact us:

By Email: dpo@paypay.pt;

By Postal Mail: to our main office, located in Estrada Regional 104, Nº 42-A, 9350-203 Ribeira Brava, Madeira.



13. When and how the data is collected

PAYPAY collects the personal data of customers through:

- Completion of registration forms for PAYPAY services, on the website;
- Completion of forms/matrices of contact requests, support service, on the PAYPAY website and demonstration requests;
- Submission of a claim, by email or telephone;
- Communications through email, telephone, or on the platform.

PAYPAY assumes that the data collected was entered by its respective owner, or made available by him/her, and that its insertion was authorized, being the information provided true and accurate.

The owners of the personal data will be informed when the collection thereof constitutes, or is not, a legal or contractual obligation or a necessary requirement to conclude a contract, as well as if the owner is obliged to provide the personal data and the possible consequences that may arise from not providing such data.

It should also be clarified that only the data strictly necessary for the provision of the services in question will be collected and requested, in accordance with the explicit information on the platform and with the user's options.

The personal data of the Customers may be collected and entered by PAYPAY in automated databases to conduct the activities foreseen in the scope of the purposes of its collection and processing.

14. Time Limits for the Storage of Information

Personal data will only be preserved for as long as necessary and for the purposes that motivated its collection or subsequent processing, ensuring compliance with all applicable legal regulations regarding archives.

Time Limits for the Storage of Information	
From the registration to the submission of documentation	At the time of registration, the support service sends an email requesting the documentation required to complete the subscription. The data of the entity and the user will be preserved for a period of 30 business days. In the event that the subscription is not concluded due to the failure to send the requested identification documentation, PayPay will delete the data.
From the submission of documentation to the subscription validation	Within 5 working days, PayPay must add the customer and user documentation on the platform and, after confirming their suitability, will approve the customer and user. Once approved, PayPay must notify the customer that his/her account is active.



<p>Preservation of information from demonstrations</p>	<p>Demonstrations requested through the platform are made according to the time preference of the potential customer. Upon request, the phone call is made and the demonstration request is concluded on the platform. Then, in one business day this information will be removed from the platform. Telephone calls are recorded for quality control purposes, and are authorized by the National Commission for Data Protection (<i>Comissão Nacional de Proteção de Dados - CNPD</i>). In case there is no consent to make the recording, the contact must be made through other means of communication, mainly by email or in person.</p>
<p>After the validation of the data on the platform</p>	<p>If PayPay observes that a customer account is inactive for a period equal to 1 year, it will inform the entity or the user that within a period of 30 business days, the customer must log in, or the account will be deleted.</p>
<p>Time limit for exercising the right to data portability</p>	<p>When requesting the exercise of the right to portability by a customer, PayPay foresees that it will process such request in a maximum of 60 days.</p>
<p>Time limit for exercising the right to be forgotten</p>	<p>The right to be forgotten can be exercised whenever it is requested by a customer and the processing of that request is carried out within a maximum period of 60 days. In order to comply with legal requirements, the information cannot be completely erased, since it must be preserved for at least 5 years, as mentioned above.</p>
<p>Time limit the deletion of an inactive account</p>	<p>PayPay preserves the data for 60 days, during which it will inform the user that, in case he/she does not give consent, the data will be deleted. During this period the user can always request the deletion of his/her data and, in this way, the stipulated period for the deletion of the data applies.</p>

15. Cookies Policy

PayPay uses cookies for the operation of the website, to increase its efficiency and to obtain information from the site.

Cookies are small text files sent by the web portals that the user visits and which are stored on his/her computer. They are widely used for the operation of Web portals, or to increase their efficiency, as well as to provide information to site owners.

The following table briefly explains the cookies we use and why we use them:



<i>Google Analytics</i>	_utma _utmb _utmc _utmz _unam	These cookies are used to collect information on how visitors use our web portal. We use the information to create reports and to improve the site. Cookies collect information anonymously, including the number of visitors, where they come from, the pages they visited, and the number of times an item is shared and how many new visits are due to that exchange.
<i>Facebook</i>	C_user Fr P Presence S Sub	Cookies used to connect to <i>Facebook</i> . User identification, access browser, "like" button and "share" button.
<i>PayPay</i>	paypayinfoCookie paypayalertaCookie paypayci	Cookies used to save alerts that were closed by the user. The <i>paypayci</i> cookie stores the information of the user session, that is, the language used.
<i>YouTube</i>	GPS PREF VISITOR_INFO1_LIVE YSC Remove_sid	Cookies used to display <i>YouTube</i> videos.

Through the settings, most browsers allow you to have some control over most cookies. For more information about cookies, including which cookies have been installed and how they can be managed and deleted, visit www.allaboutcookies.org

If you do not want Google Analytics to detect your website visits, go to <http://tools.google.com/dlpage/gaoptout>

16. Protection of customers and users

PayPayUE – Instituição de Pagamento, Unipessoal, Lda. undertakes to make available to its customers as many tools as possible, in order to guarantee the best access to services. In this the reason why the portal www.paypay.pt was created, and the team involved in its development assumes that its users are of legal age and that they accept the terms, conditions and notices contained herein. PayPayUE guarantees that the questionnaires and forms answered by the users are used to define the customer profile, as well as to monitor the quality service.

To complete the subscription process of customers and users, PayPayUE requests a set of documents that prove the suitability of the identity of those who adhere to the intermediary payment platform. In this regard, the company is governed by the requirements mentioned in document PL03 - ML and TF Risk Management Policy, in order to safeguard the identity of its customers and users.

PayPayUE undertakes to adopt all the necessary security measures to guarantee the protection of the personal data of users against possible abusive use or unauthorized access. On the other hand, by consulting the www.paypay.pt portal, the user agrees not to modify, copy, distribute, transmit, project, reproduce, publish, allow, create derivative works, transfer or sell any information, software, products or services obtained from this website.



In accordance with the General Data Protection Regulation in force, and its national implementation, all subscribers have rights over their data, i.e.: the right to access (Art. 15); to update and to rectification (Art. 16); to object (Art. 21); to restriction of processing (Art. 18); to data portability (Art. 20); or to the erasure of personal data (Art. 17), by contacting PayPayUE – Instituição de Pagamento, Unipessoal, Lda. Furthermore, PayPayUE – Instituição de Pagamento, Unipessoal, Lda. is obliged to communicate all subscribers of its services if their data has been modified, erased or restricted of processing (Art. 19).

Also, customers have the following rights: to lodge a complaint with a supervisory authority (Art. 77); to an effective judicial remedy against a supervisory authority (Art. 78); to an effective judicial remedy against a controller or processor (Art. 79); and to compensation and liability (Art. 82).

- ✓ Assessment of risks associated with data processing;
- ✓ Promotion and dissemination of the data protection culture;
- ✓ Creation of a security mechanism by departments and by platforms – conducting initial and continuous audits.

17. Amendments to the Privacy Policy

We reserve the right to update and modify our policy at any time, being our responsibility to inform customers of changes that alter the consent previously reached, being at their discretion to continue with the contractual commitment.

Customers will be notified by email or through a notification on our website when substantial modifications are made to this policy.

18. Acceptance of the Privacy Policy

The use of this system implies the consent and acceptance of the clauses of our Privacy Policy. In the event of a dispute regarding the aforementioned terms and conditions of use, the Portuguese legislation will apply.

19. Questions and Suggestions

The collection and processing of personal data will be carried out in accordance with current applicable legislation and the guidelines of the National Commission for Data Protection (*Comissão Nacional de Protecção de Dados - CNPD*).

Any matter related to the collection and processing of the data of the Customers of the PAYPAY Group will be governed by current legislation.

For more information on how the PAYPAY Group platforms use your personal data, or to clarify any doubts, submit a claim or comment about the Privacy Policy, please contact those platforms through the contacts mentioned below.



20. Contacts of the Data Protection Officers

PAYPAY is the company responsible for the collection and processing of your personal data, for the purposes mentioned in this Privacy Policy.

Main office: Estrada Regional 104, Nº 42-A, 9350-203 Ribeira Brava, Madeira

Tel: 707 451 451

Fax: 291 957 171

E-mail: dpo@paypay.pt

21. Online Availability

This privacy and data protection policy can be checked online at the following link:

<https://www.PayPay.pt/politica-privacidade>