

PRIVACY NOTICE FOR OUR EXTERNAL PROVIDERS

The privacy of our External Providers is important to Verbarium – Luso Translation Boutique[®] (Chancexpression, Lda), hereinafter referred to as Verbarium.

We are committed to ensuring confidentiality and privacy in the collection and processing of personal or business data from our External Providers, fulfilling our obligations under the General Data Protection Regulation, hence developing this Privacy Policy.

General Scope

Verbarium is responsible for this Privacy Policy, as well as for the processing of any data collected through the CV, the External Provider Data Sheet—completed and signed at the beginning of the collaboration—or through any other means, provided by External Providers. In the scope of this Privacy Policy, Verbarium has defined External Provider as: any entity which provides us with services.

Verbarium reserves the right to update or modify its Privacy Policy at any time, namely, to adapt it to legislative changes.

Data Collection

Verbarium collects data from its External Providers through email, social media networks, Skype, and any other electronic media.

Verbarium is the entity responsible for the collection and processing of such data, deciding on the categories of data collected, its processing, and the purposes for which it will be used.

All procedures, automated or not, undertaken to enable the collection, compilation, storage, modification, and transfer of personal data shall be considered "personal data processing".

Use of Data

The data collected is used in the communication process, in the management of the relationship between the company and the External Provider, and for the fulfilment of legal obligations.

Some of the personal data will be transferred to authorized third parties (for example, chartered accountant, banks, etc.) solely for the aforementioned purposes.

Access to Data

Verbarium shall not disclose the personal data of an External Provider to any third parties without the expressed consent from the External Provider.

Verbarium shall take reasonable precautions to ensure that its internal employees or External Providers with access to personal information receive appropriate training for the correct processing of sensitive information. They are required to respect this policy and the legal obligations on data protection. In the event of non-compliance, Verbarium will apply disciplinary sanctions to its internal employees and External Providers.

External Providers may, at any time, obtain information related to their personal data, and have the right to have it deleted, rectified or blocked, either in whole or in part.

Data Storage

Verbarium stores only the data of its Customers and Users (name, e-mail, telephone number and Skype address) that is deemed vital for daily operations; namely, the provision of the service and e-mail communication on the administration's password-protected computer and on the Cloud. The Cloud is protected and maintained in accordance with security standards and in order to respect applicable privacy laws.

The remaining data is stored on a dedicated external hard drive and not connected to the external network.

Data Storage Time

The data is collected only for the period required and for the purpose for which they were collected.

For the purposes described in this Privacy Policy, data will be retained for the duration of the contractual and commercial relationship, or until the External Provider requests its deletion. The storage period of other specific data to be retained for compliance with legal obligations may be extended for a maximum period of up to 10 years (in accordance with article 130 of the IRC code), after which it will be deleted.

Data Security

Verbarium has taken the technical and organizational measures necessary to adequately protect its data from unauthorized processing and access.

Verbarium has undertaken all reasonable efforts to prevent the unauthorized or unlawful use of an External Provider's personal data, as well as the loss, destruction or damage of such data. However, we cannot guarantee its absolute security. In the event of a leakage, loss or breach of personal data, which is likely to result in a high risk to the rights and freedoms of our External Providers, we will:

- 1. Notify the supervisory authorities within 72 hours after becoming aware of the incident;
- 2. Report the situation to the owner of the affected data in a timely manner.

Data Processors

Verbarium uses the following data processors

Entity name	Purpose	Country of the entity
MEO - Serviços de Comunicações e Multimédia, S.A.	Cloud	Portugal
CiberConceito, Lda.	Website and email hosting	Portugal
Orlanda Rodrigues Contabilidade, Fiscalidade e Gestão Lda.	Accounting	Portugal
Jasmin – PRIMAVERA BSS, S.A	Invoicing system	Portugal
Banco Português de Investimento	Homebanking	Portugal

Rights of External Providers

According to Data Protection Laws, External Providers have the right to obtain information related to their personal data. External Providers also have the right to know which personal data has been processed by Verbarium. External Providers may at any time, request information related to their personal data, as well as request to have it rectified, deleted or blocked, in whole or in part, should the information be incorrect, incomplete, or irrelevant for the purposes of processing.

External Providers may, at any time, change or withdraw their consent. Should they wish at any time, to be removed from the Verbarium database, this right can be exercised by contacting us at <u>admin@verbarium-boutique.com</u>

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