

PRIVACY POLICY

Clínica Alcoforado cares about safeguarding the privacy of its customers, potential customers, suppliers and potential suppliers, and guarantees that their personal data will be processed in accordance with the applicable legal provisions.¹

In this regard, we would like to draw your attention to the following data protection information, regarding the use of our website available at <http://www.clinicaalcoforado.pt/> (hereinafter referred to as the "Website"), access to which necessarily implies the acceptance of this privacy policy.

1. Who is responsible for the processing of data?

CLÍNICA PERIODONTAL E IMPLANTES, LDA. (hereinafter referred to as "Clínica Alcoforado"), registered at the Lisbon Company Registration Office under the unique registration and legal person number 503 994 081, and head office at Páteo Bagatela Corpo 3 BL A Piso C ESC.2 S / LJ TR Légua Póvoa, 1250 Lisboa, acts as the data controller for its customers, potential customers, suppliers, potential suppliers and business partners (hereinafter jointly referred to as "Data Subjects").

If you have any questions about how we process the personal data you have provided us, the contents of this document or if you would like to exercise any of the rights mentioned in this document, you should send us an email at mariana.alcoforado@clinicaalcoforado.pt or, alternatively, write to us at:

CLÍNICA PERIODONTAL E IMPLANTES, LDA.

Páteo Bagatela Corpo 3 BL A Floor C ESC.2 S / LJ TR Légua Póvoa, 1250 Lisboa

Clínica Alcoforado would also like to inform you that a Data Protection Officer (hereinafter referred to as "DPO") has been appointed, who is responsible for, among other duties, (i) monitoring the compliance of data processing with the applicable regulations, (ii) being a point of contact for the data subjects to ask any questions regarding the processing of their data by Clínica Alcoforado, (iii) cooperating with the National

¹ In particular, in accordance with EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 (General Data Protection Regulation) and Law No. 58/2019 of 8 August which ensures the implementation of the GDPR ("Law no. 58/2019"), in the Portuguese legal system.

Data Protection Commission (hereinafter referred to as “CNPD”), and (iv) providing information and advice to Clínica Alcoforado on its obligations with regards to privacy and data protection.

2. What are personal data?

“Personal data” means any information, of any nature and on any medium, relating to an identified or identifiable natural person. A person is deemed identifiable if they can be directly or indirectly identified, for example by name, identification number, location data, electronic identifier or any other elements that enable the identification of that natural person, such as specific characteristics relating to their physical, physiological, genetic or economic identity.

Clínica Alcoforado processes the following personal data within the scope of its business activities:

- Contact details: name, postal address, telephone or mobile number, email address, among others;
- Personal information: date of birth; citizen’s card/identity card number; taxpayer number; bank account details; marital status, among others;
- Payment data: credit and/or debit card numbers, security code numbers, payment dates, amounts owed or payments received, among others;
- Health data;
- Data relating to electronic interactions: cookies, IP address, among others;
- Customer history: customer number; services provided, among others;
- Other personal data that the Data Subjects provide within the scope of the activities carried out by Clínica Alcoforado.

3. For what purposes are your personal data processed?

The development and carrying out of the various activities pursued by Clínica Alcoforado require the existence of a relevant set of specific, explicit and legitimate purposes for the processing of your personal data, such as those outlined in the following examples:

- Provision of health and oral aesthetics services;
- Management of customers and suppliers;
- Administrative, economic and accounting management;
- Contact management;
- Customer support;
- Marketing;

- Customer Loyalty;
- Scheduling appointments, including through the website;
- Capture and Recording of Images by CCTV Devices;
- Management of the use of the website.

4. On what basis do we process your personal data?

When carrying out its business activities, Clínica Alcoforado only processes the personal data of Data Subjects when there is a legal basis that legitimises processing, namely:

- Consent:** when it has your express consent - in writing, orally or through the validation of an option - and prior and if that consent is free, informed, specific and unequivocal;
- Contract enforcement and pre-contractual due diligence:** when the processing of personal data is necessary for the conclusion, execution and management of the contract in which you are a party, as a customer, supplier and/or partner, or to carry out pre-contractual due diligence at your request;
- Compliance with a legal obligation:** when the processing of personal data is necessary to comply with a legal obligation to which Clínica Alcoforado is subject, such as the communication of data to police, judicial, fiscal or regulatory entities;
- Legitimate interest:** when the processing of personal data corresponds to a legitimate interest of Clínica Alcoforado or third parties, such as improving the quality of service, detection of fraud or when the reasons for its use should prevail over the rights of the data subjects); and
- Vital interests:** where the processing of personal data is necessary to ensure the protection of the vital interests, namely the life, of Data Subjects or third parties.

5. Who do we share your data with?

All Clínica Alcoforado employees who require access in order to fulfil the aforementioned purposes will have access to your personal data.

Your data may also be transmitted:

- To your family members, when the exercise of a right in court proceedings is at stake or if you are physically or legally incapable of giving your consent;

- b) To your insurance company or health subsystem of which you are a beneficiary, if you wish the services provided to be covered by your insurance or health subsystem;
- c) To subcontractors so that they process them on behalf of Clínica Alcoforado. In this case, Clínica Alcoforado shall take the necessary contractual measures to ensure that the subcontractors respect and safeguard the personal data of the Data Subjects, by only using subcontractors that provide sufficient guarantees to implement adequate technical and organisational measures for this purpose;
- d) To third parties, whenever there is a legal obligation that justifies the transmission of the data, such as Tax Authorities.

Clínica Alcoforado does not transfer data outside the European Economic Area. If, however, this data transfer is necessary to ensure the fulfilment of the purposes mentioned in this privacy policy, Clínica Alcoforado undertakes to carry out such a transfer in full observance of the applicable legislation in terms of data protection, in particular the provisions of Chapter V of the GDPR.

6. How long do we preserve your personal data?

We process your data for as long as necessary for the purposes for which they were collected or, if any, for the period of time set by law or recommended by the National Data Protection Commission (hereinafter referred to as "CNPD").

For example, Clínica Alcoforado will preserve:

- a) Accounting or tax data or data relating to commercial bookkeeping, for a period of 10 years;
- b) The images collected by the CCTV system are stored for a maximum period of 30 days;

Once the maximum retention period has been reached, your personal data will be irreversibly anonymised (anonymised data may be preserved) or will be destroyed in a secure manner.

7. What are your rights?

Under the terms of the applicable data protection legislation, Data Subjects may, at any time, exercise the following rights:

- a) **Right of access** – right to obtain confirmation of which personal data are being processed and information about them, such as, for example, the purposes of the processing, the retention periods, among others;

- b) **Right to rectification** – right to request the rectification of your personal data that are inaccurate or request that incomplete personal data is completed;
- c) **Right to erasure of data or “right to be forgotten”** - right to erase your personal data, provided that there are no valid reasons for its retention, such as cases in which Clínica Alcoforado must preserve data in order to comply with a legal obligation or because legal proceedings are underway;
- d) **Right to portability** - the right to receive the data you have provided us in a digital format for current and automatic reading or to request the direct transmission of your personal data, if technically possible;
- e) **Right to object** – the right to oppose processing based on a legitimate interest, provided that there are no compelling or legitimate reasons that prevail over your interests, rights and freedoms, or to defend a right in legal proceedings;
- f) **Right to restrict processing** - the right to request the limitation of the processing of your personal data, in the form of: (i) suspension of processing or (ii) limitation of the scope of processing to certain categories of data or purposes for processing data;
- g) **Right to withdraw consent** – if the processing of your personal data is dependent on obtaining your consent, you have the right to withdraw it, without such withdrawal invalidating the processing of data while the consent is in force.

To exercise your rights, you must notify us in writing, to the contacts listed in this Privacy Policy document.

This notice must contain:

- a) Name and photocopy of national identity document;
- b) Specific request (i.e., right to exercise);
- c) Address for notification purposes.

The exercise of rights is free of charge, except in the case of a manifestly unfounded or unreasonable request, in which case a reasonable fee may be charged by taking into account the costs required to fulfil said request.

Finally, Clínica Alcoforado informs you that, under the terms of the GDPR, you also have the right to lodge a complaint with the CNPD (www.cnpd.pt), if you consider that Clínica Alcoforado has not complied with the requirements of the GDPR or the applicable national legislation on data protection.

8. How do we protect your data?

Clínica Alcoforado prevents unauthorised access or disclosure by using a variety of security measures, including encryption and authentication tools, to help protect and maintain the security, integrity and availability of your personal data. We highlight the following protection measures:

- i. Facilities Security: entry to the facilities is restricted to workers;
- ii. Access to computer systems is protected by login and password, with different security levels that must be changed periodically;
- iii. Clínica Alcoforado's entire IT network is protected by antivirus, firewalls and monitoring of installed software;
- iv. Use of SSL in the domain; and
- v. Use of encryption technology when collecting or transferring confidential data.

9. Updates to this privacy policy

Clínica Alcoforado reserves the right, at any time, to make adjustments or changes to this privacy policy, and these changes are duly publicised on our website, available at <http://www.clinicalcoforado.pt/>.

Lisbon, December 29, 2020