



## Informative Note – Personal Data Protection Policy

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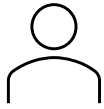
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# Our personal data protection policy



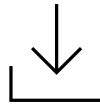
## Entity in charge of processing personal data

DIF Broker -  
Sociedade Financeira  
de Corretagem SA



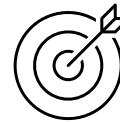
## Which categories of personal data do we process?

Identification and personal contacts;  
Bank details;  
Criminal, Tax, Assets and Professional data;  
Statistical data; and  
household data and  
record telephone calls.



## How do we obtain your personal data?

We only process the personal data that you provide by filling in the account opening form or by e-mail and the specific data provided by the LexisNexis platform.



## What are the purposes for the processing of your data?

We use your personal data for the purpose of carrying out pre-contractual diligences; execution of the service provision contract; sending newsletters and other communications; fulfilment of legal and tax obligations; and for the purpose of monitoring the quality of the service provided.



## What is the legal ground for the processing of your data?

The processing of your data is legally based on consent; the need to perform a contract or to carry out pre-contractual diligence; the need to comply with legal obligations; or, where applicable, it is also based on the pursuit of a legitimate interest of DIF Broker.



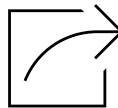
## For how long do we store your data?

Depending on the specific case, your data may be stored for 120 days, 2 years, 3 years, 6 years, 7 years, 10 years, 20 years, or for as long as you have a contractual relationship with us.



## Who has access to your personal data?

Within the scope of our services and in compliance with tax and legal obligations to which DIF Broker is subject, the subcontractors and recipients better identified in points 6 and 8 of this policy have access to your data.



## To where do we transfer your personal data?

With appropriate safeguards in place, we transfer part of your data to subcontractors who are based in India and the United States of America



## What are your rights?

Right to withdraw consent; Right to Information;  
Right to access  
Right to Rectify  
Right to Erasure;  
Right to Limitation of Processing;  
Right to data portability;  
Right to lodge a complaint before the supervisory authority.



## Control Authority

Comissão Nacional de Proteção de Dados  
(National Data Protection Committee)

(Av. D. Carlos I,  
134, 1º  
1200-651 Lisbon)

# 1. Data Protection Policy

DIF BROKER - SOCIEDADE FINANCEIRA DE CORRETAGEM S.A. (hereinafter "DIF BROKER") is committed to protecting the personal data of its Customers and Users of its website and, in this context, has prepared this Policy, which underlies its commitment to comply with the legal rules on privacy and protection of personal data.

In this Policy, Customers and Users are made aware of the general rules on the processing of personal data, which are collected and processed in strict compliance with the provisions of the personal data protection legislation in force at any given time, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("GDPR") and Law No. 58/2019, of 8 August 2019 (Enforcement Law), as well as Directive 2002/58/EC of the European Parliament and of the Council, of 12 July 2002 (Directive on privacy and electronic communications) and Law No. 41/2004, of 18 August.

DIF BROKER adheres to best practice in the area of safety and protection of personal data and for that purpose has adopted the necessary and appropriate technical and organisational measures to ensure compliance with the legislation on the protection of personal data and to ensure that the processing of personal data is lawful, fair, transparent, and limited to the purposes specifically established.

Similarly, DIF BROKER has adopted and otherwise regularly updates the measures it deems appropriate to ensure the accuracy, integrity, and confidentiality of personal data as well as the rights of the correspondent data subjects.

This Policy also applies to all Customers and Users of mobile applications or who access DIF BROKER websites or who interact with DIF BROKER through any other means, including through social networks, digital communication channels and multiplatform instant messaging and voice call applications or otherwise.

The rules set forth herein supplement the provisions, with respect to the protection and processing of personal data, set forth in the agreements entered into or to be entered into by Customers/Users with DIF BROKER, as well as those set forth in the terms and conditions governing the offer of the various services, which are duly publicized on DIF BROKER's websites.

## 2. What is the entity responsible for the processing of your data?

In accordance with the provisions of Regulation (EU) 2016/679, of 27 April 2016 (GDPR), the entity responsible for processing personal data is the *natural or legal person, public authority, agency, or other body which, individually or jointly with others, determines the purposes and means of processing personal data*. For all due purposes and under the terms set out below, the quality of data p is undertaken by DIF Broker - Sociedade Financeira de Corretagem SA.

<b>Name of the entity</b>	DIF Broker - Sociedade Financeira de Corretagem SA
<b>Legal status</b>	Public Limited Company
<b>Tax ID</b>	504767640
<b>Economic Activity Code (CAE)</b>	66120 - Activities of trading on behalf of third parties in securities and other financial instruments
<b>Activity</b>	The exercise of activities permitted by law to financial brokerage companies, including all ancillary, connected or similar operations compatible with such activity and permitted by law.
<b>Registries in Portugal</b>	CMVM No. 276, Bank of Portugal No. 225
<b>Head Office</b>	Rua António Cardoso, n.º 613, loja 8, 4150-083 Porto, Portugal
<b>Telephone contact</b>	+351 21 120 1595
<b>E-mail</b>	suporte@difbroker.com
<b>Website</b>	<a href="https://www.difbroker.com/pt/">https://www.difbroker.com/pt/</a>

### 3. Who is the Data Protection Officer and how to contact him?

The Data Protection Officer plays an important role in the processing of personal data, ensuring, among other things, the compliance of data processing with the legislation in force, verifying compliance with this Data Protection Policy and defining clear rules for the processing of personal data, ensuring that all those who entrust the processing of their personal data to the Data Protection Officer are aware of how DIF Broker processes them and what rights they have in this regard.

Thus, the personal data subjects, if they wish, may address a communication to the Data Protection Officer, concerning matters related to the processing of personal data, using, for this purpose, the following contact: [RGPD@difbroker.com](mailto:RGPD@difbroker.com)

### 4. Which legal principles do we obey?

Within the scope of processing the personal data, DIF BROKER acts in compliance with and in respect of the following legal principles:

- **Principle of Lawfulness, Loyalty and Transparency:** personal data are processed lawfully, loyally, and transparently.
- **Principle of Purpose Limitation:** personal data are collected for specific, explicit, and legitimate purposes and not processed in a way incompatible with those purposes.
- **Principle of Data Minimisation:** personal data are adequate, relevant, and limited to what is necessary in relation to the purposes for which they will be processed.
- **Principle of Accuracy:** personal data must be accurate and up to date. Inaccurate data shall be updated or deleted.
- **Principle of Limited Conservation:** Personal data shall be stored in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which they

are processed, without prejudice to the application of longer conservation periods in compliance with legal obligations.

- **Principle of Integrity and Confidentiality:** personal data are safely stored by means of appropriate and effective technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction, or damage by means of the application of appropriate technical or organisational measures.
- **Principle of accountability:** DIF BROKER is responsible and liable for the compliance with these principles and must be able to prove it.

## 5. Concepts and definitions

The following concepts and definitions are used in the terms of this Personal Data Protection Policy:

**TABLE 1 - CONCEPTS AND DEFINITIONS OF THE PERSONAL DATA PROTECTION POLICY**

<b>Customers</b>	"Customers" means all individuals persons who have entered into, or are in the process of entering into, a contractual relationship with DIF BROKER, including not only current purchasers of its services but also any natural persons who are considered a potential purchaser of its services.
<b>Personal data</b>	Personal data are considered to be all information about customers and users that falls under the definition provided by the provisions of paragraph 1 of Article 4 of the General Data Protection Regulation.
<b>Enforcement Law</b>	Law No. 58/2019, of 8 August 2019, which ensures the implementation, in the national legal order, of Regulation (EU) 2016/679 of the Parliament and of the Council, of 27 April 2016.
<b>Entity in charge of the data processing</b>	Entity determining the purposes and means of processing personal data, as defined in the provisions of Article 4, paragraph 7 of the General Data Protection Regulation.
<b>GDPR</b>	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of personal data (General Data Protection Regulation)
<b>Subcontractor</b>	Legal or natural person who processes personal data on behalf of the controller, as defined in Article 4, paragraph 8 of the General Data Protection Regulation.
<b>Processing</b>	"Processing" of personal data means any operation performed upon personal data or sets of personal data, whether by automated or non-automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction as defined in Article 4, paragraph 2 of the General Data Protection Regulation.
<b>Users</b>	For the purposes of this Personal Data Protection Policy, "Users" means all natural persons who visit or otherwise access the website of the Data Controller.
<b>Website</b>	It refers to DIF BROKER's website at <a href="https://www.difbroker.com">https://www.difbroker.com</a> and its subdomains, provided that they are controlled or maintained by DIF BROKER.

## 6. Data Processing

### A. Which personal data do we collect?

DIF BROKER, within the scope of its business activities and in compliance with the principle of the minimization of personal data, processes the personal data strictly necessary for the provision of the services contracted with its customers. Such personal data fall within the following categories:

- **Personal Identification and Contacts:** this category includes personal data such as name, image, address, telephone contact, e-mail address, gender, nationality, and place of birth.
- **Bank Details:** this category includes bank, financial and related details of the personal data subjects, such as the IBAN (International Bank Account Number).
- **Data of a Criminal Nature:** under this category personal data relating to criminal convictions and offences are collected.
- **Tax-related Data:** these data includes the fiscal data associated to its subject, including the tax identification number, the Social Security Identification Number (NISS), the tax address, as well as the contributions and withholdings for tax declaration purposes.
- **Data of a Patrimonial Nature:** this includes personal data referring to the income obtained, and transactions made by the subjects, as well as their financial and personal assets.
- **Professional Data:** this category of personal data includes data such as the subject's curriculum vitae, profession/professional category, employer, sector of activity and level of education.
- **Statistical data:** this category includes demographic data, customer and user preferences, the value in account, products transacted, pages visited, webinars attended, and also the communications (chat) carried out.
- **Voice recording data:** this data includes call recordings and other information that is discussed in this particular area.
- **Household data:** this category includes data such as marital status, household composition and identification of household members as PEP (Politically Exposed Person).

### B. For what purposes do we process your personal data?

Your personal data are collected and processed solely to achieve the following set of specific purposes:

- **Carry out pre-contractual due diligence:** respond to requests for information or enquiries; handle the account opening process; carry out the procedure to verify the identity of potential Customers using a Qualified Trust Service Provider pursuant to Regulation (EU) No. 910/2014 of the European Parliament and of the Council of 23 July 2014; and handle the procedure of digital signature of contractual documentation (herein including the issuance of the relevant certificate).
- **Fulfil contractual obligations binding DIF BROKER and its customers:** provide customer service and support; perform the services and obligations set forth in the contract, namely, for the purpose of administrative management of applications, processing and registration of Users on DIF BROKER's website to enable access to the account and trading platform where financial transactions are



carried out; invoicing; control of commissions; sending of communications relating to customer activity; request for updating documentation.

- **Communicate and announce new services or send newsletters and other communications:** Sending of newsletters, articles or news reports of a purely informative nature on markets, products or matters related to the provision of services; sending of promotional or merely informative communications on topics related to DIF BROKER's services or products.
- **Comply with legal and tax obligations to which DIF BROKER is subject:** perform due diligence for the prevention of money laundering and terrorist financing; perform due diligence for the prevention of market abuse; report to national and international supervisory bodies on DIF BROKER; report to tax and administrative authorities; provide information in legal proceedings; comply with other legal obligations specifically provided for in national and European legislation.
- **Perform a quality control of the service provided:** Record telephone calls with the purpose of maintaining the quality of the service and keeping a record to identify the integrity of the communications carried out through this medium.

### C. On what legal grounds do we process your personal data?

Pursuant to Article 6 of the General Data Protection Regulation (GDPR), DIF BROKER processes your personal data on the following lawful grounds:

- **Consent:** this will be the legal basis in cases where personal data are used to communicate new products or services and send newsletters to leads (potential customers)
- **Compliance with contractual obligations or performance of pre-contractual due diligence:** this will be the legal basis in cases where personal data appears necessary to provide customers with the contracted services; to ensure the account opening process and identity validation; their access to the digital platforms used by DIF BROKER in the provision of its services; as well as to allow customer access to the trading platform where financial transactions are carried out.
- **Compliance with legal obligations:** this will be the legal basis in cases where the processing of personal data is necessary for compliance with tax obligations to which DIF BROKER is subject, in particular for the purposes of money laundering and terrorist financing prevention procedures; compliance with market abuse prevention procedures; report to national and international supervisory bodies of DIF BROKER; report to tax and administrative authorities, among others.
- **Legitimate interests pursued by the controller:** this is the basis of lawfulness used by DIF Broker to record telephone calls for the purposes of maintaining the quality of service and keeping a record to identify the integrity of communications made via this medium, and to communicate and advertise new services to existing customers or send newsletters and other communications to them.

#### D. How do we obtain your personal data?

Personal data, the object of processing by DIF BROKER, are obtained in the following ways:

- **Through the Customer:** DIF BROKER collects personal data from its customers by telephone (where the Customer or potential Customer contacts DIF BROKER for information regarding its services) or in writing (by sending an e-mail or submitting forms available on DIF BROKER's website that the Customer or potential Customer has completed, including account opening forms, contact forms, or newsletter subscription forms).
- **Through cookies which the User consents to be used:** by consenting the use of certain categories of cookies, DIF BROKER may collect statistical data and data relating to User preferences, including, without limitation, data relating to the type of browser used and default language.
- **Through the subcontractor LEXISNEXIS Risk Solutions FL INC:** in compliance with its legal obligations, DIF BROKER is required to carry out a number of procedures relating to the prevention of money laundering and financing of terrorism and, for this purpose, obtains personal data of Customers relating to criminal convictions and offences.

#### E. For how long are your personal data stored?

The period of time during which personal data are stored and retained varies depending on the specific purposes for which they are required. Some of the retention periods derive directly from the Law, which imposes an obligation to retain personal data for a minimum period of time. Thus, and whenever there is no specific legal requirement, the data will be stored and kept only for the minimum period necessary for the pursuit of the purposes that motivated their collection or their subsequent processing, under the terms defined by law.

In the context of the personal data processing activities carried out by DIF BROKER, it is possible to identify the following time periods for storing personal data or the criteria that serve as a reference for their materialization:

- **120 days:** website chat tickets opened by Customers, potential Customers or Users will be stored and retained for a period of 120 days.
- **2 years:** for the purposes of billing verification and due diligence processes by the Managing Partner, the personal data of customers shall, without prejudice to other applicable periods, be retained for a period of 2 years.
- **3 years:** in the case of newsletters or other promotional communications, the personal data used for this purpose will be kept for a period of 3 years, or alternatively, until the moment in which the subject chooses to withdraw their consent or to oppose the processing of their data.
- **7 years:** personal data of the Customer that has been collected in compliance with legal obligations relating to measures to combat money laundering and terrorist financing will be kept for a period of 7 years after the Customer account is closed, as provided for in article 51 of Law No. 83/2017 of 18 August.
- **10 years:** Customer data will be kept for a minimum of 10 years for the purposes, among others, of recording accounting transactions, preparing accounting information, and preparing tax reports.

- **20 years:** the personal data of Customers, necessary for the purposes of validity, effectiveness and evidential value of electronic documents and the digital signature shall be kept for a minimum period of 20 years, as provided for in Decree-Law no. 290-D/99 of 2 August.
- **For the period corresponding to the contractual relationship with the customer:** in all other cases where no specific minimum storage period has been established, Customers' personal data will be kept for the minimum period corresponding to the contractual relationship between DIF BROKER and its Customers.

## 7. Which subcontractors do we use for the processing of your data?

Within the scope of its activity, DIF BROKER uses third parties to provide certain services. In this context, the provision of services involves access by such third parties to data relating to Users and Customers. Where this is the case, DIF BROKER takes appropriate steps to ensure that those who have access to the data are in compliance with the obligations imposed by the GDPR and provide the highest guarantees of protection for the rights and freedoms of data subjects. In compliance with the provisions of paragraph 3 of Article 28 of the GDPR, the terms and conditions of data processing by third parties, better identified below, are objectively defined by means of a contract on data protection that binds both parties.

As such, any entity subcontracted by DIF BROKER will process the personal data of our Users and Customers in the name and on behalf of DIF BROKER and will adopt the necessary technical and organizational measures to protect personal data against accidental or unlawful destruction, accidental loss, alteration, unauthorized disclosure or access and against all other unlawful forms of processing.

In any case, DIF BROKER remains responsible for the personal data made available to these third parties.

## 8. To where do we transfer your personal data?

DIF BROKER only transfers personal data to entities outside the European Union:

- Located in third countries for which there is an adequacy decision adopted by the European Commission under Article 45 of the GDPR;
- In compliance with a legal obligation to which DIF BROKER is bound;
- To group companies located outside the European Union in order to share resources and optimize the services provided by DIF BROKER;
- To companies (subcontractors) which, although located outside the territory of the European Union, provide appropriate safeguards for the purposes of Article 45 of the GDPR, and in respect of which the data subjects enjoy enforceable rights and effective legal remedies. Regarding these entities, DIF BROKER ensures that the implementation of adequate safeguards for the execution of data transfers is ensured by the ratification of the standard data protection clauses adopted by the European Commission.

Currently, DIF BROKER transfers personal data outside the territory of the European Union as follows:

- Personal data are transferred to the subsidiary DIF MARKETS, Agente de Valores S.A., located in the Eastern Republic of Uruguay, under the Adequacy Decision of the European Commission of 21 August 2012. These transfers occur in order to optimise resources and to ensure the management and support of customers outside the usual days and hours in Portugal and Spain;
- Personal data are transferred to Zoho Corporation, located in the United States of America, under the standard clauses set out in Article 45 of the GDPR. These transfers occur through the acquisition by DIF BROKER of the virtual infrastructure that includes the management of a CRM (Customer Relationship Management) technological platform in a "Cloud" model for the management of customers and potential customers.
- Personal data are transferred to BATS Chi-X Europe Market, Bats Global Markets - Cboe Global Markets, based in the UK, under the standard clauses set out in Article 45 of the GDPR. These transfers occur in order to allow customers access to the pan-European stock exchange.
- Personal data are transferred to SIX Group Services Ltd, based in Switzerland, pursuant to the European Commission's Adequacy Decision of 26 July 2000. These transfers occur in order to allow customers access to the Swiss stock exchange.
- Personal data are transferred to Qualified Intermediary Solutions LLC, based in the United States of America, under the standard clauses set out in Article 45 of the GDPR. These transfers occur in order to provide technical and expert support to DIF BROKER in relation to the Foreign Account Tax Compliance Act (FATCA).
- Personal data are transferred to Badwal & Tapadia Technologies Pvt. Ltd, based in India, under the standard clauses set out in Article 45 of the GDPR. These transfers occur in order to provide DIF BROKER with access to a computer support network.

## 9. To which recipients are your personal data communicated?

In compliance with several legal regulations governing its activities, including, among others, regulations relating to the prevention, detection and reporting of money laundering operations or suspicious transactions, DIF BROKER is legally required to share certain categories of personal data of its Customers with the following entities:

- Tax and Customs Authority
- Bank of Portugal (BoP)
- Securities and Exchange Commission
- Central Bureau of Investigation and Prosecution
- Criminal Investigation Police
- Financial Intelligence Unit (FIU)

## 10. What are your rights?

Data subjects, such as Users, Customers and potential Customers, enjoy, under the terms of the GDPR, the following framework of rights.

<b>Rights</b>	<b>Description</b>
<b>Right to withdraw consent</b>	Where consent is used as the legal basis for data processing, the data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of the data processing carried out until then pursuant to that consent.
<b>Right to Information</b>	The data subject shall have the right to receive, among others, information about the identity of the person responsible for processing the personal data; the purposes and grounds for processing the personal data; the terms and periods for storing the personal data; the rights he or she enjoys and the specific manner in which these can be exercised; and the existence or non-existence of automated decisions concerning his or her data.
<b>Right to Access</b>	The data subject shall have the right to obtain confirmation from DIF BROKER as to whether or not personal data are being processed, including, among others, the purposes of the processing, the categories of personal data covered by the processing, the storage periods and related criteria, and the existence of automated decisions. The right to access shall also include the right to have direct access to such personal data.
<b>Right to Rectify</b>	The data subject shall have the right to obtain from the controller the rectification of personal data which are incorrect and to request that incomplete personal data be completed.
<b>Right to Erasure (Right to be forgotten)</b>	The data subject has the right to obtain the erasure of personal data, provided that there are no other valid grounds which justify, under the Law, the conservation of such data, and whenever: <ul style="list-style-type: none"><li>a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li><li>b) the processing of personal data is based on the consent of the data subject, and the data subject withdraws this consent, there being no other legal grounds for the processing;</li><li>c) the data subject exercises his/her right to oppose to the further processing of his/her personal data and no other legal ground justifies the continued processing of the personal data;</li><li>d) the personal data have been unlawfully processed.</li></ul>
<b>Right to limitation of processing</b>	The data subject shall have the right to obtain from DIF BROKER the limitation of the processing of personal data or the suspension of processing activities where one of the following situations arises: <ul style="list-style-type: none"><li>a) The accuracy and correctness of personal data is challenged by the data subject, requiring data processing activities to be suspended for</li></ul>

	<p>the period necessary for DIF BROKER to confirm the accuracy of such data;</p> <p>b) The processing of personal data is unlawful, and the data subject requests the limitation of the data processing instead of requesting the erasure of the data.</p>
<b>Right to data portability</b>	The data subject shall have the right to receive the personal data provided to DIF BROKER in a digital format for common use and automatic reading, as well as the right to request the direct transmission of his/her data to any other data controller.
<b>Right to oppose</b>	The data subject shall have the right to oppose at any time, on grounds relating to his or her particular situation, to processing of personal data concerning him or her, in particular where his or her data are processed for the purposes of direct marketing.
<b>Right not to be subject to automated decisions</b>	The data subject shall have the right not to be subject to a decision taken solely on the basis of automated processing of his or her personal data, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

Without prejudice to the provisions of the personal data protection legislation, the data subject may exercise any of his/her rights, directly or by written request to DIF BROKER through the following means and contacts:

- By e-mail: [RGPD@difbroker.com](mailto:RGPD@difbroker.com)
- By post: DIF BROKER SA, Av. da Liberdade Nº 244-4º, 1250-149, Lisbon
- By telephone: +351 211 201 595

## 11. The right to lodge a complaint

If the User or the Customer considers that the processing of their personal data is carried out in breach of the legal provisions regulating data processing, they have the right to lodge a complaint under the terms of articles 77 and 79 of the GDPR.

Without prejudice to the possibility of lodging complaints directly with DIF BROKER through the contacts provided for such purpose, the User or the Customer may lodge a complaint with the Control Authority, the National Data Protection Committee (CNPD), using the contacts provided by that entity for such purpose.

DIF BROKER's contacts:

- By e-mail: [RGPD@difbroker.com](mailto:RGPD@difbroker.com)
- By post: DIF BROKER SA, Av. da Liberdade Nº 244-4º, 1250-149, Lisbon
- By telephone: +351 211 201 595

## 12. How to exercise your rights?

Any data subjects who wish to exercise any of the rights set forth in sections 10 and 11 of this data protection policy may do so by addressing their request to DIF BROKER SA, Av. da Liberdade 244-4º, 1250-149, Lisbon - Portugal, or via the following e-mail address: [RGPD@difbroker.com](mailto:RGPD@difbroker.com), with the words "RGPD DIF BROKER" in the subject line. If you are acting as an authorized representative, please attach proof of such representation.

## 13. How do we protect your personal data?

DIF BROKER has implemented the appropriate technical and organisational mechanisms and security measures to ensure an adequate level of risk in the processing of personal data.

For this purpose, DIF BROKER is based on an objective assessment having identified, analysed, and evaluated the risks, likelihood and impact on the rights and freedoms of individuals (risk assessment phase) and accordingly, DIF BROKER, in the risk processing phase, applies timely and effective security mechanisms and measures to eliminate or mitigate the risks identified in the risk assessment phase. In particular, appropriate and effective technical and organisational measures are adopted to mitigate the risks concerning the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored, or otherwise processed, or unauthorised access to such personal data.

Likewise, DIF BROKER guarantees to data subjects that they will comply with the duty of professional secrecy, confidentiality, and respect for their personal data.

## 14. Processing of special categories of personal data

In the forms made available by DIF BROKER where the respective fields may be freely filled in, the insertion of personal data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic data, biometric data for the purpose of uniquely identifying an individual person, data concerning health or data concerning a person's sex life or sexual orientation, as well as personal data concerning criminal convictions and offences, are expressly prohibited. If the User or potential Customer enters any information regarding the mentioned aspects into any of our forms or via e-mail, such data will be immediately deleted from our information systems, as they are neither necessary nor relevant for the purposes described under the terms of the present data protection policy.

## 15. Forwarding to other websites

Any forwarding and hyperlinks from the DIF BROKER's website that forward the User or potential Customer to websites belonging to third parties are not under our control. Accordingly, DIF BROKER shall not be liable for any problems arising from the use of third-party websites, in particular for the purposes of processing



personal data. DIF BROKER therefore recommends that you consult the privacy policy and the terms and conditions of each website to which the User or potential Customer is forwarded.

## 16. Quality of the personal data

The personal data provided by the User and the potential Customer must be correct, current, accurate and true and correspond solely to their person, except when a third party is lawfully and regularly able to legally represent the User or potential Customer.

In the event that third-party personal data are supplied, or false, fictitious, or non-existent data are provided, DIF BROKER reserves the right not to process such data, or to delete or otherwise destroy them.

In respect of the principle of minimisation of personal data, provided for in the provisions of Article 5, paragraph 1, subparagraph c) of the GDPR, the personal data requested from the User or potential Customer, indicated with an asterisk (\*), shall be strictly those necessary for the fulfilment of the respective purposes. In no case shall the fact that the User or potential Customer does not provide more data than strictly necessary for the fulfilment of the respective purposes have any consequence whatsoever, nor shall it affect the quality of the service provided.

## 17. Data of minors or incapacitated persons

The services offer made available by DIF Broker is expressly prohibited to persons under 18 years of age and to persons declared incapable under civil law.

DIF BROKER may request additional information or documentation for the purpose of verifying the age or capacity of the potential Customer.

## 18. Social networks, digital channels, and multiplatform applications

DIF BROKER manages different accounts as well as fan pages on different social networks operated by different social media providers (individually: Facebook, Twitter, Instagram, and LinkedIn). [Click here](#), to learn more about our Data Protection Policy on Social Media.

## 19. The lead supervisory authority

The National Data Protection Committee (CNPD) is the national supervisory authority with powers to monitor compliance with the existing legal provisions on the protection of personal data, in order to defend

and enforce the rights, freedoms and guarantees of individuals with regard to the processing of personal data.

Any citizen has the right to lodge a complaint with the National Data Protection Committee regarding the data processing to which he or she is subject.

**National Data Protection Committee (CNPd)**

Av. D. Carlos I, 134 - 1.º

1200-651 Lisbon

Tel.: +351 213928400 - Fax: +351 213976832

E-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)

Website: [www.cnpd.pt](http://www.cnpd.pt)

## 20. Amendment to the data protection policy

DIF BROKER reserves the right to amend or modify this Personal Data Protection Policy at any time and such amendments shall be duly announced in the various communication channels of DIF BROKER.