



## Social Media Privacy Policy

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# 1. Social Media Privacy Policy

DIF BROKER - SOCIEDADE FINANCEIRA DE CORRETAGEM S.A. (hereinafter "DIF BROKER"), with head office Avenida 24 Julho, nº 74 a 76, 1200-869 LISBOA, Portugal, operates different accounts, as well as fan pages on different social networks operated by different social media providers (individually, "Social Media Provider"), as described in this data protection policy.

## 2. What personal data do we collect and how do we use them?

### A. Facebook

We operate fan pages (individually, "Fan Page") on the social network Facebook, a network operated by Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland ("Facebook"). We use the Fan Page to provide information about our company, products, services and offers, as well as current developments, and to communicate with our users.

Users can have the opportunity to send messages via our Fan Page using Facebook Messenger, as well as share, comment or "Like" our posts. DIF Broker processes profile data (particularly the user's name) and the corresponding interaction (for example, the content of the message or comment) in order to process users' queries and respond to their requests. The legal basis for this processing is the provision of the services requested by users as provided in Article 6, paragraph 1, subparagraph b) of the GDPR.

In our Fan Page, we use the "Facebook Page Statistics" feature. This feature includes page statistics, provided by Facebook, that give us information about how users interact with our Fan Page. Page Statistics may be based on personal data collected through a user's visit to, or interaction with, our Fan Page and its content. DIF BROKER and Facebook are jointly responsible for the processing of Statistical Data and have entered into a contract in accordance with Article 26 of the GDPR. The contract is available at: [https://pt-pt.facebook.com/legal/terms/page\\_controller\\_addendum](https://pt-pt.facebook.com/legal/terms/page_controller_addendum). More information about Facebook Page Statistics is available at: [https://pt-pt.facebook.com/legal/terms/information\\_about\\_page\\_insights\\_data](https://pt-pt.facebook.com/legal/terms/information_about_page_insights_data).

DIF BROKER processes the page statistics provided by Facebook to analyse the use of its Fan Page. This feature allows us to improve our Fan Page and make our posts and activities on the page more attractive to our users. The legal grounds for such processing are based on the provisions of Article 6, paragraph 1, subparagraph f) of the GDPR. Our legitimate interest is the improvement and optimisation of our Fan Page for the benefit of the users.

### B. Twitter

DIF BROKER operates accounts (individually, "Account") on Twitter, a social network operated by Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 Ax07, Ireland ("Twitter"). We use the Account to provide information about our company, products, services and offers, as well as current developments, and to communicate with our users.

Users can have the opportunity to send messages, as well as share, comment or "Like" our posts. DIF BROKER processes profile data (particularly the user's name) and the related interaction (e.g. the content of the message or comment) in order to process users' queries and respond to their requests. The legal basis for this processing is to provide the services requested by users as set out in Article 6, paragraph 1, subparagraph b) the GDPR.

### C. Instagram

DIF BROKER operates accounts (individually, "Account") on Instagram, a social network operated by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland ("Facebook"). We use the Account to provide information about our company, products, services and offers, as well as current developments, and to communicate with our users.

Users can have the opportunity to send messages, as well as share, comment or "Like" our posts. DIF BROKER processes profile data (particularly the user's name) and the related interaction (for example, the content of the message or comment) in order to process users' queries and respond to their requests. The legal basis for this processing is to provide the services requested by users as set out in Article 6, paragraph 1, subparagraph b) the GDPR.

### D. LinkedIn

DIF BROKER operates accounts (individually, "Account") on LinkedIn, a social network operated by LinkedIn Ireland Ltd, Gardner House, 2 Wilton Pl, Dublin 2, Ireland ("LinkedIn"). We use the Account to provide information about our company, products, services and offers, as well as current developments, and to communicate with our users.

Users can have the opportunity to send messages, as well as share, comment or "Like" our posts. DIF BROKER processes profile data (particularly the user's name) and the corresponding interaction (for example, the content of the message or comment) in order to process users' queries and respond to their requests. The legal basis for this processing is to provide the services requested by users as set out in Article 6, paragraph 1, subparagraph b) the GDPR.

## 3. How are your data processed by Social Media Providers?

For each visit to an Account or Fan Page or each interaction with our posts, the respective Social Media Provider may process your personal data. The Social Media Provider may also use cookies (which are small files transferred to users' devices).

When the user is registered on the Social Media Provider's platform, the Social Media Provider can assign the collected data to the personal user account on the platform, which allows for the monitoring of user behaviour and profiling (including across different devices). In addition, the Social Media Provider may process your personal data to customize advertisements which are shown to you on their platform or on third party websites.

DIF BROKER does not, and cannot, control the data processing operations carried out by Social Media Providers. For more information about how and for what purpose the Social Media Provider collects and processes your personal data, as well as the rights and options you have to protect your privacy and personal data, please refer to the applicable privacy policies of the Social Media Provider

Facebook Privacy Policy: <https://pt-pt.facebook.com/about/privacy/update>

Facebook Cookies Policy: <https://pt-pt.facebook.com/policies/cookies/>

Twitter Privacy Policy: <https://twitter.com/pt/privacy>

Twitter Cookies Policy: <https://help.twitter.com/pt/rules-and-policies/twitter-cookies>

Instagram Privacy Policy: <https://help.instagram.com/519522125107875>

LinkedIn Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

LinkedIn Cookies Policy: <https://www.linkedin.com/legal/cookie-policy?>

Please keep in mind that Social Media Providers may process or transfer your data respectively to the United States or to other countries outside the European Economic Area.

#### 4. What are your rights?

Data subjects enjoy the following framework of rights under the GDPR.

Rights	Description
Right to withdraw consent	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.
Right to Information	The data subject shall have the right to receive, among others, information about the identity of the controller; 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.
Right to Access	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.
Right to Rectification	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.
Right to Erasure(Right to be forgotten)	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</li> </ul>

	<p>other legal grounds for the processing;</p> <p>c) the data subject exercises his/her right to object to the further processing of his/her personal data and no other legal ground justifies the continued processing of the personal data;</p> <p>personal data has been unlawfully processed.</p>
<b>Right to restriction of procession</b>	<p>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:</p> <p>a) The accuracy and correctness of personal data is challenged by the data subject, requiring data processing activities to be suspended for 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 dataportability</b>	<p>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.</p>
<b>Right to object</b>	<p>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.</p>

Without prejudice to the provisions of 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: [GDPR@difbroker.com](mailto:GDPR@difbroker.com)
- By post: DIF BROKER SA, Av. da Liberdade N° 244-4º, 1250-149, Lisbon
- By telephone: +351 211 201 595

## 5. 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.

Notwithstanding 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 Comissão Nacional de Proteção de Dados (CNPD), using the contacts provided by that entity for such purpose.

DIF BROKER's contacts:

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

## 6. How to exercise your rights?

Data subjects who wish to exercise any of the rights set forth in sections 9 and 10 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: [GDPR@difbroker.com](mailto:GDPR@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.

## 7. 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 on Social Media 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)