



## Information About Data Protection

Your privacy and safety are very important to **DIF BROKER FINANCEIRA DE CORRETAGEM S.A. (Hereinafter “DIF BROKER”)**. Therefore this policy contains the practices regarding the personal data processing on the websites owned by **DIF BROKER**, namely the database with the collected data and its processing, use and disclosure.

This policy explains your rights and how and for which purposes your data is collected.

### 1. Identification of the social entity responsible for the file

Accordingly to the provisions on REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL of 27 April 2016 on the protection of physical individuals regarding the personal data processing and free movement of data (hereinafter GDPR), we inform that the personal data collected or sent to DIF Broker shall be processed by the following Data Processing Officer:

**Name: DIF BROKER – SOCIEDADE FINANCEIRA DE CORRETAGEM S.A**  
**Registered office: Rua António Cardoso, no. 601-613, Lj 8, 4150-083 Oporto**  
**Country: Portugal**  
**Telephone: +351 211 201 595**  
**E-mail: [RGPD@difbroker.com](mailto:RGPD@difbroker.com)**  
**Address (office): Av. da Liberdade No. 244- 4º 1250-149 – Lisbon**  
**N.C.P.I: 504.767.640**  
**Object: Financial Intermediation and auxiliary services**  
**Registries in Portugal: CMVM No. 276, Bank of Portugal No. 225.**

**Who is the Data Protection Officer of DIF BROKER, and how is it possible to contact them?**

The Data Protection Officer is the individual responsible for protecting the fundamental right to the personal data protection on DIF BROKER , who undertakes the regulatory compliance of data protection. You may contact the Data Protection Officer of DIF BROKER through the following email address: Contact of the Data Protection Officer: [RGPD@Difbroker.com](mailto:RGPD@Difbroker.com)

## **2. What are your personal data used for?**

At DIF BROKER your personal data are collected and processed with the following purpose:

### **Processing: Management of competitions**

Purposes for which we process your personal data:

The purpose of the processing of personal data is to manage the competition, as well as the delivery of the respective prizes, in particular:

- Manage participation in the Contest.
- Ensure compliance with participation requirements.
- Identify the winning person.
- On a daily basis, communicate and publish in Social Networks, DIF BROKER web sites and other means of communication and promotion that are considered appropriate for the communication of the winner and other well performed participants.

## **2.2. How long do we keep your data?**

The data will be kept for as long as necessary to ensure the purpose for which they were collected (such as the management and promotion of the contest), if there is no voluntary request of data exclusion and according to legal periods.

## **2.3 Are there automated decisions or profiling?**

No automated decisions are made about your data.

## **3. What is the legitimacy for the treatment of your data?**

Consent of the participant or interested party: the legal basis for the treatment is the consent of the participant obtained in the registration form, as well as the acceptance of the conditions of the competition.

In case the personal data is not provided, data processing and treatment it will not be therefore it will not be possible to enter the competition.

## **4. To which recipients will your data be communicated?**

Sessions:

- Internet publications, social networks, catalogues and commercial events: winner data can be communicated and published on web pages, social networks, catalogues and other commercial events.
- Advertising and communication services: providers hired by the organization.
- Transfers: no international transfers of data are made outside the EU.

## 5. Where do your personal data come from?

The data was obtained from the same interested party or its representative through the registration contest form.

## 6. What are your rights in relation to your personal data?

The user may manage and direct their communications and exercise his/her rights (of access, update, correction, opposition, to be forgotten, limitation and portability) accordingly to the requirements imposed by the regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of individuals, personal data processing and free movement of data.

On all our operational transactions regarding your privacy, DIF Broker endeavours to comply with the current standards. The following table lists the important rights of the concerned party:

My rights	What does it mean?
<b>Right to Information</b>	The User is entitled to receive clear, concise, transparent and easy to understand information on how their personal data is used. This information is provided on number 5 of this policy.
<b>Right of Access</b>	<p>The User is entitled to access their personal data (with certain limits).</p> <p>The clearly unfounded, excessive or repetitive requests may be refused.</p> <p>To exercise this right, you must contact us through any of the below mentioned means.</p>
<b>Right to Correction</b>	<p>You are entitled to the correct of your personal data when it is inaccurate, no longer valid or incomplete.</p> <p>To exercise this right, you must contact us through any of the below mentioned means. If you already have an account, you may easily alter your data.</p>
<b>Right to be Forgotten</b>	<p>On certain cases, you may request that your personal data is deleted or eliminated. It should be mentioned that this is not an absolute right as, due to legal or legitimate reasons, they may stored.</p> <p>If you want your personal data to be deleted, contact us through any of the below mentioned means.</p>
<b>Right of opposition to direct marketing,</b>	You may request the cancellation of the subscription to our marketing communications at any moment.

**included on the profile elaboration**

The simplest way to request the cancellation is to click at “unsubscribe” (cancel the subscription). Otherwise, you may send an email to the email address: [RGPD@difbroker.com](mailto:RGPD@difbroker.com) or call +351 211 201 595

To oppose to the profile elaboration, contact us through any of the below mentioned means.

**Right to withdraw the consent at any moment when the data processing is based on consent**

If you have given your consent for some of the purposes informed and established on the above-mentioned processes, we inform that you are entitled to withdraw your consent at any moment, without affecting the processing lawfulness, as it was based on a previous consent.

To be informed about what type of processing are refer to, we suggest the revision of number 5 on this policy.

If you want to withdraw your consent, contact us through any of the below mentioned means.

**Right of opposition to the processing based on the satisfaction of legitimate interests**

The user may, at any moment, oppose to the processing of their data, when based on the satisfaction of a legitimate interest. To learn more about which consents are based on legitimate interest, we suggest the reading of number 5 of this policy.

If you want to exercise this right, contact us through any of the below mentioned means.

**Right to file a claim to a data control authority**

We inform you that if your rights or way to exercise them were not satisfied, you may file a claim before the Data Control Authority. To learn more about the rights and how to exercise them, you may go to the Portuguese Data Protection Agency and obtain the necessary information on the following website: [www.cnpd.pt](http://www.cnpd.pt) .

Please contact us through the below mentioned means before filing your claim to the competent authority on data protection matters. Our complaints department may assist you.

**Right to data portability**

The user is entitled to receive the personal data which are charged to them and already provided to us, on a structured format, of common use and mechanical reading, so that it may be transferred to another entity responsible for the processing, whenever the processing is based on the execution of a contract or consent and carried out by automatized means. To learn more about which processing are included on the consent, we suggest the reading of number 5 of this policy.

To get more information, contact us through any of the below mentioned means.

**Right of processing limitation**

The user is entitled to request the limitation of their data processing. If this right is exercised, the processing of your data are subject to certain limitations, therefore we may store them, but we may not use or process them.

This right may only be exercised on specific circumstances, defined by the GDPR, such as:

- That the concerned party contests the accuracy of their personal data, during the term which allows the responsible to check its accuracy;
- That the processing is illegal or the concerned party opposes to the suppression of personal data and requests its use limitation.
- Opposes the suppression of personal data and instead requests its use limitation;
- That the responsible entity does not need the personal data for processing purposes, but the concerned party needs it for the defence of claims.
- That the concerned party has opposed to the processing due to article 21, paragraph 1), whenever the legitimate reasons of the responsible entity prevail over the concerned party's interests.

If you want to exercise this right, contact us through any of the below mentioned means.

p>At any moment, the User may deactivate the Cookies. As a rule, the setting of Internet browsers is available, by default, to accept the use of Cookies. Nonetheless, they may be easily deactivated through the alteration of the browser's settings.

#### **Right to deactivate cookies**

Most cookies are used to improve the functionality of the websites and, for this reason, if they are deactivated, you may not fully or partially use the services offered through our web and may encounter some problems on the website use or login.

If you want to limit or block all the cookies established by our webs (which may prevent you from using certain parts of the web) or by other webs/applications, you may do so through your browser's settings.

### **How can you exercise your data protection rights?**

To exercise your rights, you must send your request to DIF Broker SA, Av. da Liberdade 244-4º 1250-149 – Lisbon – Portugal, or through the following email address: [RGPD@difbroker.com](mailto:RGPD@difbroker.com) where you should indicate the following subject “GPDR DIF Broker. You should specify about which of the rights you need to be clarified, annexing a copy of the Citizen Card or equivalent identification document. If you are acting as an authorized representative, you shall also annex the document which justifies this quality, as well as the representative's identification document. You may find a minute on:

The website of the Portuguese Data Protection Agency on the following website: [www.cnpd.pt](http://www.cnpd.pt)

DIF Broker: [RGPD@difbroker.com](mailto:RGPD@difbroker.com)