

## **INFORMATION FOR CLIENTS ON THE PROCESSING OF PERSONAL DATA**

The privacy and protection of your data is of paramount importance to *Grupo Crédito Agrícola (GCA)*.

In accordance with the provisions of the Legal Regime of Agricultural Credits (Regime Jurídico do Crédito Agrícola, RJCAM), *Caixa Central de Crédito Agrícola Mútuo* (Central Mutual Agricultural Credit Bank) and its associates *Caixas de Crédito Agrícola Mútuo* (Mutual Agricultural Credit Banks) constitute the Integrated Mutual Agricultural Credit System (SICAM).

SICAM together with its affiliated companies, which include *Crédito Agrícola Imóveis, Unipessoal, Lda* ("*CA IMÓVEIS*"), comprise the Crédito Agrícola Group ("*GCA*").

The purpose of this paper is to provide you with detailed information about the use and protection of your personal data by CA IMÓVEIS, the reason for the processing of such data and your rights, in compliance with Article 13 of the General Data Protection Regulation (Regulation (EU) 2016/679) (the "RGPD").

CA IMÓVEIS is responsible for the processing of your personal data insofar as it determines the means and purpose of the processing of your personal data

The information provided in this paper may be modified from time to time. We would therefore recommend that you access the CA Imóveis website at [www.caimoveis.pt](http://www.caimoveis.pt) under GDPR, where that information will be regularly updated. You may also find the information available at the Crédito Agrícola branch offices country-wide, both in the country's mainland and in its Islands.

### **I. Personal data processed by CA IMÓVEIS as data controller**

CA IMÓVEIS collects and processes the personal data required to provide the agreed service as well as for commercial prospecting.

The personal data processed may be provided by the Clients themselves and/or by third parties (e.g. by means of the civil ID documents and personal data information produced, the use of digital channels or personal interaction) or stemming from the established relationships.

In providing the services, CA IMÓVEIS processes various categories of personal data, including:

- Civil ID data (e.g. name, sex, date of birth, signature);
- Tax ID data (e.g. tax ID number (NIF), tax office code);
- Digital ID data (e.g. IP address, geographic coordinates);
- Other ID data (vg. father's name, mother's name, *social media*);
- Address and contact data (vg. address for tax purposes, mailing address);
- Personal status data (e.g. whether an emigrant, non-resident [NIF and country], retiree, professional title);
- Professional data and academic qualifications (e.g. profession, employer, income, public positions, ENI (individual contractor);
- Contractual and assets data (e.g. bank account data, value of assets, account number, IBAN);
- Voice and image data records (e.g. voice and video recordings, photographs).

## **II. Purposes for which the personal data are processed and lawfulness of the processing**

The personal data collected are processed for the following situations:

### **a) the execution of a contract to which you are a party or in order to take steps at your request prior to entering into a contract**

CA IMÓVEIS may need to process your personal data in connection with the purchase and sale and rental of real estate (e.g. making of a promissory contract, deed of sale, lease contract and requests for visits, management of the contractual/commercial relationship).

### **b) Compliance with CA IMÓVEIS' legal obligations**

CA IMÓVEIS has a number of legal and regulatory obligations, the compliance with which may imply the need to process your personal data, such as:

- Compliance with withholding obligations, payments or obligations to file tax returns;
- Compliance with legal or regulatory obligations relative to the CA IMÓVEIS' activity;
- Compliance with legal reporting obligations or responses to public authorities;
- Compliance with procedures on the prevention and combating of financial crime;
- Security of information and protection of personal data; and

### **c) Pursuit of CA IMÓVEIS' legitimate interests**

Your personal data are also used to develop the services available, to improve the quality of service and to defend the CA IMÓVEIS legal rights and interests, including:

- The management of litigation proceedings (g. evictions, specific foreclosures, claims, demarcations);

- Fraud prevention and combat;
- The marketing and communication of own services (e.g. data analysis and processing to identify opportunities for real estate offerings; streamlining commercial activities for marketing and addressing of direct marketing communications); and
- Improving and monitoring of service quality (e.g., data analysis and processing for the communication of real estate business opportunities, information regarding the quality and performance of the various means and processes relative to the purchase, sale and lease of real estate, management of complaints).

### **III. Recipients of Personal Data**

In order to comply with its duties and provide a quality service, CA IMÓVEIS may be required to share your personal data with other entities, including the following categories of recipients:

- Public authorities, such as the Tax Authorities, the Bank of Portugal, Judicial or Administrative Courts, Notarial Offices and Real Estate Register Offices, Municipalities, Parish Councils, Directorate General of the Territory, Directorate General of Cultural Heritage, Social Security;
- Other entities with their main office in Europe, namely other banks and financial corporations, for the purchase, sale and lease of real estate at the Client's request;
- Other entities of the Crédito Agrícola Group (e.g. *Caixa Central de Crédito Agrícola Mútuo*, *Caixas de Crédito Agrícola Mútuo*, *Crédito Agrícola Serviços*, *Crédito Agrícola Informática*, *Crédito Agrícola Seguros*, *Crédito Agrícola Consult*, *Crédito Agrícola SGPS*, *FENACAM*);
- Real estate fund management companies (e.g. *Square Asset Management - Sociedade Gestora de Fundos de Investimento Imobiliário, S.A.* and *Selecta - Sociedade Gestora Fundos de Investimento Imobiliário, S.A.*);
- Commercial partners such as real estate agents and brokers (e.g. *REMAX*);
- Service providers performing services for CA IMÓVEIS, such as lawyers and auditors (e.g. *PwC*);
- Real estate appraisers (e.g. *Savills Aguirre Newman*, *FENCAM*, *Rockvalue Consulting*, *Jones Lang LaSalle*, *L2i - Investimentos Imobiliários*, *MoreValue*, *PVW*, *The K Advisors*).

In the case of international transfers (outside the European Union), where the European Commission has declared, through an adequacy decision, that the country located outside the European Union ensures a level of personal data protection equivalent to the one under European Union law, the data transfer will be based on such adequacy decision.

Where the transfer is made to countries or organizations located outside the European Union for which there is no adequacy decision by the Commission, CA IMÓVEIS has implemented safeguards to ensure the protection of your data.

#### **IV. Time limit for the storage personal data**

CA IMÓVEIS will continue to process the data as long as necessary or mandatory for the purposes set out above.

Upon termination of the contractual and/or commercial relationship, the personal data, the processing of personal data and their storage will continue during the mandatory legal periods or until the rights arising therefrom become statute-barred.

#### **V. Rights of the data subjects**

Under the terms of the applicable law the data subjects, i.e. the Clients, are entitled to the following rights:

- Right of access: whenever you request it, you may access your personal data, obtain information related to the processing of your data and also obtain a copy of your personal data subject to processing.
- Right of rectification: whenever you consider your personal data to be incomplete or incorrect, you may request that they be rectified or completed.
- Right to erasure: without prejudice to the legal and regulatory obligations that may limit the exercise of this right, you may request the erasure of your personal data where one of the following situations occur: (i) the personal data are no longer necessary for the purpose that motivated their collection or processing; (ii) you withdraw the consent on which the data processing is based and there is no other legal ground for it; (iii) you submit opposition to the processing of the data and there are no overriding legitimate interests, to be assessed on a case-by-case basis, that justify the processing; (iv) the personal data must be erased under a legal obligation to which CA IMÓVEIS is subject; or (v) the personal data has been collected in connection with the provision of information society services.

The right to erasure does not apply where the processing is necessary (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation which required such processing; (iii) for reasons of public interest in the area of public health; (iv) for achieving purposes in the public interest, scientific or historical research purposes or statistical purposes insofar as exercising the right to erasure would seriously impair the achievement of the objectives of that processing; or (v) for the establishment, exercise or defence of legal claims.

- Right to restriction of processing: you may request the limitation of the processing of your personal data where one of the following cases occurs: (i) if you contest the accuracy of your personal data, for a period of time sufficient to verify their accuracy; (ii) if the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead; (iii) if CA IMÓVEIS no longer needs the personal data for the purposes of the processing but requires the data to establish, exercise or defend legal claims; or (iv) if you object to the

processing until it is established that the legitimate interests of CA IMÓVEIS override your own.

- Right to data portability: where processing is based on express consent or on the performance of a contract and where the processing in question is carried out by automated means, you may request that the personal data supplied by you be delivered in a structured, commonly used and machine-readable format. You also have the right to request that CA IMÓVEIS transmit such data to another controller, provided that this is technically possible.
- Right to object: You have the right to object to the processing of your personal data in the following situations: (i) where the processing is based on the legitimate interest of CA IMÓVEIS; or (ii) where the processing is carried out for purposes other than those for which the data has been collected, but compatible therewith. If you object to the processing, CA IMÓVEIS will stop processing your personal data unless it has legitimate reasons for doing so and these override your interests. You may also object to the processing of your data for direct marketing purposes, including profiling which is related to such marketing.
- Right not to be subject to automated individual decisions solely: in data processing which is carried out by automated means, you have the right to (i) obtain human intervention and analysis; (ii) express your point of view; and (iii) challenge the decision made.
- Right to withdraw your consent: In cases where the data processing is based on your consent, you may withdraw your consent at any time. In this case, your personal data will no longer be processed, unless there are other grounds that justify such processing by CA IMÓVEIS.
- Right to lodge complaints with the CNPD (National Commission for Data Protection): you have the right to lodge complaints at the National Commission for Data Protection (CNPD) regarding matters related to the processing of your personal data.

You may use the following channels in order to exercise any of your rights,:

**Branch:** you may exercise your rights at any branch office of Crédito Agrícola;

**E-mail:** you may exercise your rights by e-mail, to the address [protecaodedados@creditoagricola.pt](mailto:protecaodedados@creditoagricola.pt)

**Address:** Rua Castilho 233-233A 1099-004 Lisboa

**Telephone:** +351 210 425 658\*.

\*Local landline call.

## **I. Indirect collection of your personal data**

It is possible that your personal data are collected through third parties or by other means even if you are not a client of CA IMÓVEIS, namely through real estate agents, real estate fund management companies or GCA.

The purposes for which your data is processed are identified in section II of this paper.

## **II. Contact points and Data Protection Officer**

Should you have any questions about the processing of your data or about the information provided to you, you may contact CA IMÓVEIS using the usual communication channels.

If you have any questions regarding the processing of your personal data or the exercise of your rights, you may also contact the Data Protection Officer through the following channels:

**E-mail:** [dpo@creditoagricola.pt](mailto:dpo@creditoagricola.pt)

**Address** Rua Castilho, 233 - 233/A, 1099-004 Lisboa

**Telephone** +351 213 805 694\*.

\*Local landline call.