

## **PRIVACY POLICY**

### **1. The protection of privacy and personal data is a BUS commitment**

The protection of privacy and personal data is a fundamental commitment of Zenki - Comunicação Integrada, Lda. (BUS), to the holder of personal data (also "holder") who uses digital platforms and BUS services.

With the application of the new General Regulation on Data Protection (GDPR), as of May 25, 2018, BUS has manifested that it remains strongly committed and committed to the protection of privacy and personal data of the respective holder who uses the digital platforms and BUS services and proceeds, to that extent, to update its Privacy Policy, in accordance with all the principles and rules of data protection that support the GDPR.

In this document, we try to explain what personal data we collect, for what purposes we can use it, how we treat it, with whom we share it, for how long we keep it, as well as how to contact us and exercise their rights.

BUS suggests and invites to consult the pages dedicated to privacy and protection of personal data, whose updates will be made available on BUS digital platforms.

### **2. General Regulation on Data Protection**

The new GDPR sets out the rules regarding the processing, by a person, a company or an organization, of personal data relating to persons in the European Union (EU).

The GDPR protects personal data regardless of the technology used to process that data, the protection is technologically neutral, and applies to both automated and manual processing, provided that the data is organized according to pre-defined criteria ( for example, in alphabetical order). It is also irrelevant how data are stored, in a computer system, through video surveillance, or on paper; in all these cases, personal data are subject to the protection requirements set out in the GDPR.

### **3. Who is responsible for data processing?**

Zenki - Comunicação Integrada, Lda. (BUS), headquartered at Rua Cintura do Porto de Lisboa - Rocha do Conde de Óbidos, Ed.104 - 1350-352 Lisbon, legal person 507 570 430, is the entity responsible for the treatment of personal data, under the GDPR.

### **4. Treatment of personal data, scope and modification of the Privacy Policy**

When making your personal data available to BUS, the holder of personal data consents that they are treated in accordance with this BUS Privacy Policy.

This Privacy Policy applies to data that has been directly provided by the respective holder or collected through the holder's access to digital platforms and BUS services. Thus, it is advised that digital platforms and BUS services have links (hyperlinks) to other digital platforms and refer to third party content that are not covered by the BUS Privacy Policy, so it is advisable that whenever the personal data navigate on these platforms to be informed of the content of the respective privacy policies, as well as of the applicable terms and conditions.

BUS reserves the right to change its Privacy Policy, so we advise you to consult this document regularly. If the Privacy Policy is changed, we will post a notice on our digital platforms.

### **5. What kind of information does BUS collect?**

BUS collects two types of information: personal information and anonymous information. Anonymous information occurs while the holder of personal data visits digital platforms and aims to improve its functioning, including content management and prioritization. Personal information is provided voluntarily by the personal data holder at the time of optional registration. All collected data are processed automatically, and the information collected from the personal data holder is encrypted and managed with advanced security.



The registration allows the holder of personal data to access the subscription services for BUS newsletters, comments and other features provided by BUS.

To provide certain services, BUS may have to make personal and anonymous information available to third parties. This will only happen, however, in these specific circumstances:

- a) With the express consent of the holder of personal data;
- b) When in good faith we believe it is required by law;
- c) When in good faith we believe that it stems from contractual stipulation;
- d) When in good faith we believe it is necessary to protect our rights or property;
- e) When there is a transfer to any successor or buyer, in a merger, acquisition, liquidation, dissolution or sale of assets.

The consent of the holder of personal data will not be required for disclosure in the situations referred to in points b) to e). In any event, we will seek to notify you to the extent permitted by law.

## 6. What is personal data?

Personal data is information relating to an identified or identifiable person. The person who can be identified directly or indirectly is considered identifiable. Personal data is also the set of different information that can lead to the identification of a specific person.

Examples of personal data:

- Name and Nickname;
- Home address;
- E-mail address;
- Number of an identification card;
- Location data (for example, the location data function on a mobile phone);
- IP address (internet protocol);
- Cookies;
- Your phone's advertising identifier;
- Data held by a hospital or doctor, which makes it possible to uniquely identify a person;
- Sound or image.

## 7. Who is the holder of personal data?

The holder of personal data is the natural person to whom the data relates and who has used digital platforms and BUS services.

## 8. Categories of personal data

Examples (not exhaustive):

TYPES	Data
Main identifiers	Name, civil or tax identification number, passport number, date of birth, marital status, address, telephone, e-mail address, nationality, photos and files on the mobile device, household data, data related to kinship.
Complementary identification	IBAN, geolocation, education level, gender, profession, socio-economic data, personal ID, IP address, social network addresses, type of mobile device, operating system, version of the operating system.
Special protection	Personal data of children under 16 years.

## 9. For what purposes does BUS process your personal data?

Examples (not exhaustive):

PURPOSES	DATA PROCESSING
Digital Platforms	Analysis of navigation profiles, adaptation and development of new products, content or information services (notifications, newsletters, digital platforms and information dossiers and content apps).
Content development	Analysis of navigation profiles, products, adaptation and development of new products, content or services.
Engineering, Systems and Technology	Technical responses and complaints.
Commercial	Participants in contests or hobbies, prize giving.
Marketing and Communication	Users of digital platforms and BUS services.
Institutional Relations	Registration of guests and visitors, sending invitations.

We will ask for your express consent before using the information for purposes other than those expressly provided for in this Privacy Policy.

## 10. When and how do we collect your personal data?

We collect personal data, in particular, when you participate in BUS content (hobbies, etc.) or purchase BUS products or services, BUS services and applications, by telephone or email. The collection can be made orally, in writing or through digital platforms.

## 11. What is the basis for the processing of your personal data?

### Consent

Your consent must be expressed - in writing, orally or through the validation of an option - and prior, provided in a free, informed, specific and unambiguous manner.

or

### Specifically: consent by minors (16 years)

In the case of processing personal data of minors, who may be subject to prior consent, BUS will require that consent be given by the holders of parental responsibilities, namely for the purposes of participating in hobbies.

### Contract execution and pre-contractual steps

When the processing of personal data is necessary for the execution, execution and management of a contract entered into with BUS, such as for the acquisition of archive content; or



### **Compliance with legal obligation**

When the processing of personal data is necessary to fulfill a legal obligation to which the BUS is subject, such as, for example, the communication of identification or traffic data to police, judicial, tax or regulatory entities or location data to ensure emergency services; or

### **Legitimate interest**

The processing of personal data by BUS can be justified on grounds of legitimate interest related to the performance of tasks related to its activity as a company, such as the processing of data to improve the quality of service, the detection of fraud and protection of revenue and when our reasons for using it should take precedence over your data protection rights.

### **12. For how long does BUS process and keep your personal data?**

BUS treats and keeps your personal data according to the purposes for which they are processed and only for the period of time necessary for the fulfillment of the purposes that motivated its collection and conservation, and always in accordance with the law, guidelines and CNPD decisions, or, as applicable, until it exercises its right of opposition, right to be forgotten or withdraw consent.

There are situations in which the law determines the conservation of data for a minimum period of time, namely: for one year, traffic and location data for the purpose of investigating, detecting and prosecuting serious crimes or for 10 years the data necessary for information to the Tax Authority.

After the respective period of conservation has elapsed, BUS will delete or anonymize the data whenever they should not be kept for a different purpose that may exist.

### **13. Rights of the holder of personal data**

The holder of personal data has rights to information, access and rectification or deletion of personal data and the right to data portability, the right to limit or oppose the treatment of his data, within the scope and under the terms of the GDPR and other applicable legislation .

The holder may withdraw, at any time, the consent he has given for the processing of his personal data, within the framework of the GDPR. The revocation of consent will not affect the lawfulness of the processing of personal data that has been carried out until now, based on the consent that has previously been provided.

You also have the right to file a complaint regarding the processing of your data to CNPD.

Exercise your rights through the following contacts:

#### **Email**

[callcenter@buslisboa.agency](mailto:callcenter@buslisboa.agency)

#### **Letter**

Zenki - Comunicação Integrada, Lda. (BUS)  
For the Care of Data Protection Officer  
Rua Cintura do Porto de Lisboa  
Rocha do Conde de Óbidos, Ed.104  
1350-352 Lisbon - Portugal

The exercise of rights is free, unless it is a manifestly unfounded or excessive or unreasonably repeated request, in which case a reasonable fee may be charged taking into account the costs.

The response to requests must be provided, without undue delay, within one month of receiving the request, unless it is a particularly complex request or occurs in exceptional circumstances. That period may be extended



up to two months, when necessary, taking into account the complexity of the request and the number of requests received.

As part of your request, you may be asked to prove your identity in order to ensure that the sharing of personal data is only done with the respective holder.

#### **14. Transmission of personal data**

Personal data may be transmitted to subcontractors for them to process on behalf and on behalf of BUS. In this case, BUS will take the necessary contractual measures to try to ensure that subcontractors respect and protect the holder's personal data.

The data may also be transmitted to third parties - entities other than BUS or subcontractors - such as companies within BUS, companies with which BUS develops partnerships, if the holder has consented - or entities to whom the data must be communicated under the law, such as the Tax Authority, judicial authorities, criminal police bodies, among others.

BUS may occasionally have to transfer your personal data to a third country outside the EU and that is not on the list of countries that the EU has already considered to have adequate levels of protection for personal data. In such cases, BUS will ensure that data transfers are carried out in strict compliance with applicable legal rules.

#### **15. Responsibility for digital platforms and BUS and third party services**

Regarding the use and processing of personal data from BUS digital platforms, please consult BUS's Cookie Policy.

BUS is not responsible for the content accessed through any link that leads the holder of personal data to browse outside the BUS digital platforms and for the treatment of personal data carried out on them, whenever such links are the responsibility of third parties. Internet sites and third-party content are not the subject of this Privacy Policy, so we advise that whenever you browse these sites, look for and read the privacy policies, as well as the applicable terms and conditions.

#### **16. What are the security procedures that guarantee the protection of your data?**

BUS takes all necessary and legally required precautions to guarantee the privacy of personal data processed and / or transmitted through its digital platforms. These precautions guarantee the online and offline security of that information.

Whenever sensitive information is collected or used, the data will be encrypted using the SSL protocol. This technology called Secure Socket Layer is used to improve the security of data transmission over the Internet, encrypting and protecting data and sensitive information using the HTTPS protocol. SSL guarantees the holder of personal data that the data will not be intercepted in a fraudulent manner and that all information is treated with maximum security.

#### **17. Doubts?**

If you have any questions about any of the topics covered in this document, please contact us to:

##### **Email**

[callcenter@buslisboa.agency](mailto:callcenter@buslisboa.agency)

##### **Letter**

Zenki - Comunicação Integrada, Lda. (BUS)  
For the Care of Data Protection Officer  
Rua Cintura do Porto de Lisboa  
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General Regulation on Data Protection (GDPR): Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free circulation of such data and repealing Directive 95/46 / EC (General Data Protection Regulation) (OJ L 119, 4.5.2016).