



Privacy Policy

Confidentiality and integrity of your personal data are among the main concerns of **APNC - Associação Pedras No Caminho**.

We are committed to adhering to the highest privacy standards, using your personal data exclusively for clearly identified purposes, and respecting your data protection rights.

This Privacy Policy describes how **APNC - Associação Pedras No Caminho** uses personal data, in a clear and transparent manner. We invite you to navigate the following sections to clarify all your doubts:

1 - Data Processing and Personal Data Collection

The APNC - Associação Pedras No Caminho determines the means of processing and purposes and is the entity responsible for the processing of your personal data. We ensure the protection of your privacy, complying with current legislation and the General Data Protection Regulation (Regulation No. 2016/679 of the European Parliament and of the Council, dated April 27, 2016).

Responsible Entity: APNC - Associação Pedras No Caminho

Address: *Rua de São Mateus, Nº 3 (Ex Lote 79), 1º Andar - Esc. Nº 14, Bairro São Miguel das Encostas, 2775-748 Carcavelos - Portugal*

Data Protection Officer Contact: geral@pedrasnocaminho.org

Phone: +351 21 453 01 32

APNC - Associação Pedras No Caminho is responsible for the processing of your personal data in the following situations:

- a) If you acquire and/or use a service or product from **APNC - Associação Pedras No Caminho**, through a subcontractor providing services to **APNC - Association Stones on the Path**, and/or;
- b) If you fill out your data and submit the Consent Form through our website, and/or;
- c) If you fill out your data in person, using a specific form provided at our facilities, and/or;
- d) If you consent to the processing of your data by phone, through a telephone communication for this purpose, through a subcontractor providing services to **APNC - Associação Pedras No Caminho**, and/or;
- e) If you consent to the processing of your data via SMS or email, through electronic communication for this purpose, and/or;
- f) If you consent to the processing of your data through social networks, through electronically communicated consent.

2 - Purposes and Legal Basis for the Use of Your Personal Data

Your personal data is collected and used to assist Members, Donors, Partners, Volunteers, Banking Entities, Official Entities, Individuals, and other entities. The use of personal data is based on various legal grounds, which can be consulted below.

In accordance with the data protection legislation in force in the European Union (the General Data Protection Regulation), the use of personal data must be justified under at least one legal basis for the processing of personal data. You can refer to the explanation regarding the scope of each of these principles*.



The applicable legal basis for the collection and use of your personal data for customer assistance and marketing purposes is your consent.

*Legal Bases for the Processing of Personal Data

- a) When you have given consent to the processing of your personal data (for these purposes, a consent form will be presented to you for the use of your data, which can later be withdrawn);
- b) When the processing is necessary for the conclusion or execution of a contract with you;
- c) When the processing is necessary for compliance with the legal obligations to which **APNC - Associação Pedras No Caminho** is subject;
- d) When the processing is necessary to achieve a legitimate interest, and our reasons for its use outweigh your data protection rights;
- e) When the processing is necessary for us to assert, exercise, or defend a right in a legal proceeding against you, us, or a third party.

3 - Personal Data Collected

We may collect the following data through our channels and services:

Contact Information

Full name and contact details (address, telephone, mobile, email, and social media address).

Personal Information

Date of birth; gender; marital status; family composition; relationship, profession; hobbies; preferred method of payment; preferred contact channel.

Identification Data

Membership number; contract number, IBAN, and taxpayer identification number (only in the event of making a donation/fee/payment/transaction or entering into a contract with our association).

Customer History

Customer satisfaction ratio; member, donor, volunteer, offers and promotions received; products purchased and purchase details, including information about product identification(s), quantities, date of purchase, order date, delivery date, price; history of customer contacts, whether related to product acquisition, commercial, marketing, and quality control purposes of our services and products (e.g., requests, information requests, responsible consultant, post-sale assistance history); campaign/response history; complaint history.

Data related to the use of our website and social media

If the customer has registered or authenticated on the **APNC - Associação Pedras No Caminho** website, the following data may be used: use of the **APNC - Associação Pedras No Caminho** page (details of how you used the website, date and time, and nature of your requests, your IP address, data about the device you use to interact with the website); use of **APNC - Associação Pedras No Caminho** social media (e.g., visits and posts and messages in forums).



4 - How We Ensure the Security of Your Personal Data

We have implemented the necessary technical and organizational measures to comply with the General Data Protection Regulation, including a variety of security measures such as encryption and authentication tools to help protect and maintain the security, integrity, and availability of your personal data. Although data transmission over the internet or a website cannot guarantee complete security against intrusions, our association, our service providers, and business partners, among others, make the best efforts to implement and maintain physical, electronic, and procedural security measures to protect your personal data in accordance with applicable data protection requirements. Among others, we have implemented the following:

- a) Ongoing and comprehensive training for our employees;
- b) Transfer of collected data only in encrypted form;
- c) Protection of information technology systems through firewalls to prevent unauthorized access to your personal data;
- d) Restricted personal access to your personal data based on the "need to know" criterion and only within the scope of the communicated purposes;
- e) Storage of highly confidential data (such as credit card information) only in encrypted form; and
- f) Continuous monitoring of accesses to information technology systems to prevent, detect, and prevent the misuse of your personal data.

5 - How Long We Retain Your Data and How You Can Change or Withdraw Your Consent

We retain your data in accordance with the law and the new General Data Protection Regulation, only for the period necessary for (i) the provision of the service and/or acquisition of goods, (ii) the fulfillment of legal obligations of **APNC - Associação Pedras No Caminho**, (iii) the pursuit of the purposes of collection or processing, or (iv) the fulfillment of obligations arising from the exercise of the rights of data subjects. Once the maximum retention period is reached, your personal data will be securely destroyed. At any time, you have the right to access your personal data, and within the limits of the contract and the Regulation, you can change it, object to its processing, decide on automated processing, withdraw your consent, and exercise other rights provided by law (except for data that is indispensable for the fulfillment of legal obligations to which **APNC - Associação Pedras No Caminho** is subject). If you withdraw your consent, this does not affect the processing carried out up to that date, meaning you can change or withdraw your consent at any time, but only with effect for the future. After the complete withdrawal of your consent declarations, you will no longer be contacted or receive communications for the purposes described in this Privacy Policy. To withdraw/change your consent declarations submitted to **APNC - Associação Pedras No Caminho**, simply access our website again, provide your personal data, and resubmit the Consent Form, selecting the checkboxes according to your preferences, including the complete withdrawal of your consent.

The latest Consent Form submitted to **APNC - Associação Pedras No Caminho** will prevail over all previous ones. For the same purpose, you can alternatively contact us by phone at +351 21 453 01 32 or by mail at APNC – Associação Pedras No Caminho, Address: Rua de São Mateus, Nº 3 (Antigo Lote 79), 1º Andar, Escritório, Nº 14 - Bairro São Miguel das Encostas, 2775-748 Carcavelos, Cascais - Portugal," or by email at geral@pedrasnocaminho.org.



6 - Contact Us, Your Rights, and the Possibility/Right to Complain to the Supervisory Authority.

If you have any questions related to the use of your personal data, you should contact our services by phone at +351 21 453 01 32 or by mail (APNC – Associação Pedras No Caminho, Address: Rua de São Mateus, No. 3 (Antigo Lote 79), 1º - Esc. No. 14 - Bairro São Miguel das Encostas, 2775-748 Carcavelos, Concelho Cascais - Portugal) or by email:

geral@pedrasnocaminho.org. If you are dissatisfied with our use of your personal data or our response after exercising any of these rights, you have the right to file a complaint with your supervisory authority (Comissão Nacional de Proteção de Dados – CNPD, located at Rua de São Bento, No. 148, 3º, 1200-821, Lisboa, with phone: +351 21 392 84 00, Fax: +351 21 397 68 32, and email: geral@cnpd.pt). Subject to certain conditions, you may have the right to request:

The provision of additional information about how we use your personal data;

A copy of the personal data you have provided to us;

The transfer of the personal data you have provided to us to another data controller at your request, through data portability;

The correction of any inaccuracies in the personal data we hold;

The deletion of personal data when its use is no longer legitimate;

Limitation of how we use your personal data until the complaint is investigated.

The exercise of these rights is subject to certain exceptions intended to safeguard public interest (prevention or detection of crimes) or our own interest (maintaining professional secrecy). If you exercise any of these rights, we will review your request and respond within approximately 1 (one) month.

You also have the right to be notified, as provided for in the Regulation, in case of a breach of your personal data, and you can file a complaint with the relevant authority(ies).

End.