

BRIGHTEN PRIVACY POLICE.

02_Personal data Policies

02.We_Website Policies

Code/Unit: 02.We.PI-2

Confidentiality: Internal

Type: Digital

Available on: website

Brighten Privacy Policy

1. General Information

1.1. Introduction

At, **BRIGHTEN – Consultores em Sistemas de Informação S.A** and in any of the Group brands and/or entities (hereinafter collectively referred to as “Brighten”, “us”, “we” our” or “our”) with headquarters in Portugal, we are committed to protecting and respecting your privacy. Confidentiality and integrity of your personal data is one of our main concerns. We are subject to the highest privacy standards and will only use your personal data for clearly identified purposes.

The provision of personal data in the context of the use of the website with the address <https://brightenconsulting.com/> (hereinafter “website”), implies the knowledge and express acceptance of the conditions contained in this Privacy Policy. It is also advised the reading of **Cookies Policy** available at this same address.

Our Privacy Policy, as well as the collection, processing or transmission of User Data, are governed by the provisions of General Data Protection Regulation (“GDPR”) – Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 and other data protection laws.

1.2. Controller

BRIGHTEN is the controller according to the GDPR and therefore responsible for the data processing explained herein.

1.3. Data Protection Officer

You can contact our Data Protection Officer (“DPO”) at any time by using the following contact details:

address: A/C DPO | Rua Cupertino de Miranda, Lote 6, 2B 1600-513 Lisboa| PORTUGAL;

e-mail: privacy.officer@brightenconsulting.com

2. Collection and Purposes of Processing of Personal Data

Your personal data will be collected and processed by us in the following situations:

- Website

Access to and navigation on the website does not necessarily imply the provision of personal data. However, there are certain website features that imply the provision of personal data, for example (i) if you wish to submit a question or suggestions using the contacts tab; (ii) if you send us your CV (Curriculum Vitae); (iii) or the subscription of the newsletter or marketing campaigns. If you wish to contact us through the website, we will collect a set of personal data, which are processed for the following situations:

Purpose	Personal Data	+ info
to respond to a request/ question/ suggestion	<i>name, e-mail, details of your request.</i>	These data is essential in order to process your request and give you a response. During the presentation of your request/question/suggestion, you may spontaneously provide other personal data that we do not request.
Application for a job open position by sending a CV	<i>name, telephone, email, Curriculum Vitae (CV), URL LinkedIn (if applicable)</i>	The personal data collected will be processed to analyse your application. By submitting your data, you agree and declare that it is accurate and correct. Selection and Recruitment Policy , at this same address, completes this information.
subscription to the newsletter and communications from Brighten	<i>Name, e-mail</i>	To send the newsletter and communications related to campaigns, events, webinars, trainings and other information related to our services.
Optimizing and improving our website and/or our online services	<i>IP address currently used by your device, date and time, the browser type and operating system of your device, the pages accessed</i>	These data is collected for the purposes of optimizing and improving our website as well as our online services. Your personal data is only stored if you provide it to us on your own account, e.g. as part of a registration, when you apply to a job open position or online contact message sent to us.

- In addition to the website, personal data may be collected and processed by us in the following situations:

Purpose	Personal Data	+ info
When you contact us by phone for information about our services or products	<i>name, telephone, details of your request</i>	These data is essential in order to process your request and give you a response. During the presentation of your request/question/suggestion,

		you may spontaneously provide other personal data that we do not request.
To manage Client B2B services	<i>name, e-mail, telephone, service requested, VAT</i>	These data will be used to identify you as a customer, to administer your account and to provide the services you have contracted with us.
When you contact us through social networks	<i>Information relating to connection data (IP address, cookies, logs or other tracking technologies); contact details.</i>	These data is essential in order to process your request and give you a response. Social networks access is dependent on your subscription to a page and acceptance of the provider Privacy policies.
When you participate in one of our marketing campaigns or one of our events	<i>name, e-mail, telephone.</i>	These data will be use to share marketing information with you, invite you to events and to share details about new services and other communications we believe are relevant to you.
When you report a concern (Whistleblowing)	<p><i>If you wish to remain anonymous no personal data will registered, only the concern classification type, day, time, hour and concern details will be recorded.</i></p> <p><i>If you wish to be identified then the contact and identification details you insert will be registered.</i></p>	If you report a concern governed by Law 93/2021 / Regulation (EU) 2019/1937 of the European Parliament and the Council – (Whistleblower), using the available channels including using the link Brighten Speak Up
If your data is sent to us by our partners or by third parties, to the extent that the requirements in this regard provided for in data protection legislation have been verified		These data will be used within our legitimate interests to develop our business.

3. Lawfulness for the processing of personal data

All the information collected is recorded, used and protected in accordance with current EU Data Protection Legislation. Under which, the processing of personal data must be justified by at least one legal basis. Your data will be processed on a legal basis under the terms of the General Data Protection Regulation (GDPR) and for the following purposes:

Purpose	Legal Base
To manage Client B2B services	These data will be used to identify you as a customer, and to manage the services you have contracted with us, including management of tickets submitted through the Ticket Platform - Contractual obligations - Art. 6 (1) al. b) - GDPR

Application for a job open position by sending a CV	Applying for an open position / Talent, constitutes an affirmative action through which you have given your consent to the processing of the personal data shared. Such data will only be used to manage your application - consent Art. 6 (1), al. a) GDPR.
Communications	Marketing communications , sending newsletters and other communications that we think may be of interest to you are based on your consent - consent Art. 6 (1), al. a) GDPR.
Customer Service	<p>We consider that we have legitimate interest in answering the queries or consultations raised by you through the existing different contact channels. We understand that the processing of these data is also beneficial to you to the extent that it enables us to assist you adequately and answer to the queries raised - legitimate interest Art. 6°, n.º 1, al. f) GDPR .</p> <p>When you get in touch with us, in particular, for the management of incidents related to the service acquired through the Tickets Platform, the processing of your data is necessary to perform the purchase contract. - Contractual obligations - Art. 6 (1) al. b) GDPR</p> <p>When your request is related to the exercise of your rights on which we inform you below, or to claims on our products or services, we are legally permitted to process your data for compliance with our legal obligations. - Legal obligations Art. 6°(1) al. c) GDPR</p>
Optimizing and improving our website and/or our online services	The processing is legally based on legitimate interest as it is in our legitimate interest to protect our website and to improve the quality of our services. Additionally we understand that that the processing of these data is also beneficial for you because the purpose is to improve the user experience and provide a higher quality service - legitimate interest Art. 6°, n.º 1, al. f) GDPR.
When you report a concern (Whistleblowing)	The processing of data is legally permitted for compliance with our Legal obligations - Legal obligations Art. 6°(1) al. c) GDPR

If you have given us your consent to the further use of your data, it may be used in accordance with the scope described in the respective declaration of consent.

We will collect your personal data to the extent necessary to comply with these obligations and transmit it to the authorities upon notification. In addition, we will process your personal data to the extent necessary for management of legal and/or judicial actions.

4. Your Rights

As a data subject, you can contact our Data Protection Officer at any time with a notification under the contact information mentioned above under **Section 1.3** to make use of your rights. Once the legally provided conditions have been verified, these rights are the following:

- The right to receive information about the data processing and a copy of the processed data;

- The right to demand the rectification of inaccurate data or the completion of incomplete data;
- The right to demand the erasure of personal data;
- The right to demand the restriction of the data processing;
- The right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format;
- The right to object to the data processing;
- The right to withdraw a given consent at any time to stop a data processing that is based on your consent;
- The right to file a complaint with the competent supervisory authority: CNPD – [Comissão Nacional de Proteção de Dados](#).

5. Cookies

To make your visit to our website more pleasant and to enable the use of certain functions, we may use “cookies” on various pages. Cookies are small text files that are stored on your terminal device. Some of the cookies we use are deleted after the end of the browser session. Other cookies remain on your device and enable us or our partner companies to recognize your browser on your next visit.

You can set your browser in such a way that you are informed about the setting of cookies separately and decide individually about their acceptance or exclude the acceptance of cookies for certain cases or generally. For more information, see the help function of your Internet browser.

If cookies are not accepted, the functionality of our website may be limited. To find out more about how we use cookies you can access our **Cookie Policy**.

6. Data Recipients / Data Sharing

We may use third party service providers to process your personal data. These service providers may be located in countries within and outside the European Union (EU) and the European Economic Area (EEA). We ensure that these service providers process personal data in accordance with European data protection legislation to guarantee an adequate data protection level, even if personal data are transferred into a country outside the EEA for which no adequacy decision of the EU Commission exists. We may share your personal data to third parties that provide us with support in the services that we offer you:

Third party	Sharing purpose
Supervisory authorities and/ or government authorities	Compliance with legal obligations and/or court orders, in particular under the legal duties of collaboration with institutions and public authorities.
Subcontracted entities that provide services within the scope of the services provided for this Policy	Under the terms of the contracts concluded with them, including but not limited to service providers and collaborators related to marketing and publicity; financial institutions; anti-fraud detection and prevention entities; providers of customer support related services.
Compliance with a legal obligation/court order (where applicable)	To comply with legal obligation.
Service providers contractually linked to us	Contractual fulfilment.

7. Retention Period

Personal data provided to us via our website will only be stored until the purpose for which they were processed has been fulfilled. or for the period of time necessary to comply with our obligations under European laws or laws and regulations. The time for which we will keep your data will depend on the purposes for which we process them, as explained below:

Purpose	Retention Period
To manage Client B2B services	The data will be kept as long as you are an active customer. When you cease to be a customer, the data will be securely deleted 5 years after the last interaction.
Application for a job open position by sending a CV	Application data will be kept for 3 months; The personal data of candidates not suitable for the post are deleted after selection of candidates; data relating to selection and recruitment processes are kept for 5 years to comply with the obligation legal.
Marketing / Brighten communications	We will process your data until you unsubscribe or cancel your subscription to the newsletter If you are our customer and you have given us your consent to the processing of your personal data for Brighten communications purposes, this data will be kept until the consent is revoked by you, and it will be automatically deleted 5 years after the last interaction.
Customer Support	We will process your data for the time necessary to meet your request or application.
Optimizing and improving our website and/or our online services	The personal data provided through our website will only be stored until the purpose for which they were processed is fulfilled. Cookies Policy completes this information.
When you report a concern (Whistleblowing)	All data related to the occurrences will be kept for the purposes of compliance with the applicable legislation for at least a period of five years.

	When the complaint concerns matters related to Money Laundering and Terrorist Financing, the retention period of the communications made and the reports to which they give rise shall be ensured for a period of seven years.
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However, storage periods may also be amended due to our legitimate interest (e.g. to guarantee data security, to prevent misuse or to prosecute criminal offenders).

8. Transfer of Personal Data to third countries or international organizations

As a rule, personal data is not transmitted outside the European Economic Area (EEA). In the event that such transfers are necessary, it only occurs in accordance with appropriate security measures, in compliance with the applicable legal provisions, namely as to the determination of the suitability of such a country with regard to data protection and the requirements applicable to such transfers, for example, by the conclusion of Standard Contractual Clauses approved by the European Commission.

9. How we keep your personal data secure

We have taken appropriate measures to ensure that the data provided to us during the registration is adequately protected. For this purpose, we have adopted various security measures of a technical and organizational nature, in order to protect personal data against its loss, dissemination, alteration, unauthorized treatment or access, as well as against any other form of illicit processing, including but not limited to, website and data in motion encryption, access control, segregation of duties, internal audit, network security administration and backups

10. Updates to this Privacy Policy

We may change this Privacy Policy from time to time to reflect legal changes and / or business practices. We recommend that you consult this Policy regarding possible changes whenever you visit our website.

Last update: May 2023