

(. NATIONAL hãSSION - DATA EROTECTION

REGISTRATION No. 2/2018

GUNNEBO PORTUGAL, SA., notified the National Data Protection Commission (CNPd) of a processing of personal data in order to organize a computerized record of activities related to the provision of services to customers.

Compliance with a legal obligation constitutes a basis of legitimacy for the treatment, under the terms of subparagraph b) of article 6 of Law no. August - Data Protection Law (LPD). Indeed, subparagraph c) of paragraph 1 of article 37 of Law no. 34/2013, of 16 May, imposes the obligation on private security companies to carry out this registration with the CNPD.

The information processed is collected in a lawful manner (cf. Article 5, no. 1, subparagraph a) of the LPD), for specific, explicit and legitimate purposes (cf. subparagraph b)) and the data to be processed are considered adequate, relevant and not excessive (cf. subparagraph c)), in accordance with the provisions of paragraph 1 of article 38 of Law no. 34/2013.

The data must be accurate and, if necessary, updated (cf. Article 5, point d) of the LPD), being kept only for the period necessary for the pursuit of the intended purpose, and it is up to the person responsible to take the appropriate measures to ensure that inaccurate or incomplete data are erased or rectified (cf. Article 5(1)(c) and d), and(3) of the LPD).

At the time of data collection, the information provided for in article 10 of the LPD must be provided, as well as the right of access and rectification in accordance with article 11 of the LPD.

The data are not communicated to third parties, without prejudice to consultation by supervisory entities and other transmissions legally provided to the competent authorities.

The entity responsible for the treatment must adopt the appropriate security measures to guarantee the effective security of the information and personal data processed.

Thus, pursuant to the combined provisions of article 6(b) and article 30(1) of the LPD, the aforementioned data processing is registered in the following terms:

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www.cnpd.pt

privacy line

Weekdays from 10 am to 1 pm

doubts@cnpd.pt

Case No. 978/2017 2

C 'NATIONAL DATA PROTECTION COMMISSION

Responsible GUNNEBO PORTUGAL, SA,,

Purpose To organize a computer activity log

Category of personal data processed Designation and NIF of the customer; contract number; start and end date of the contract; service provided location or locations where the service is provided; time of service provision, human resources used; material means and technical characteristics of those means.

Form of exercising rights of access and rectification In writing to the person in charge

Data communications to third parties None

Interconnections None

Transfers to third countries None

Maximum data retention period During the period of activity of the applicant

The controller must adopt adequate security measures to protect personal data, in particular against destruction, alteration or unauthorized access, pursuant to article 14 of the LPD.

Lisbon, February 7, 2018

The CNPD Secretary in replacement, CL_<:^—j Ciara Vieira Guerra '

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