

NATIONAL DATA PROTECTION COMMISSION

REGISTRATION No. 7/2018

VIHUME, LDA, 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 to pursue the purposes of collection and further processing, and it is up to the person responsible take appropriate measures to ensure that inaccurate or incomplete data are erased or rectified (cf. Article 5(1)(c) and d), and(3) of the DPL). 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:

Rua de São Bento, 148-3° Tel: 213 928400 www.cnpd.pt

1200-821 LISBON Fax: 213 976 832

PRIVACY LINE Weekdays from 10 am to 1 pm

doubts@cnpd.pt

Case No. 18149/2016 2

r 'NATIONAL OMISSION OS DATA PROTECTION

Responsible VIHUME, LDA

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 person with the person in charge at the address Av. 8 de Julio, lote 5, 1.ºA 2350-724 Torres Novas

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 22, 2018

The Secretary of the CNPD

isá^^ristina Cruz

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