

# PRIVACY POLICY

(Under the General Data Protection Regulation)

Following your contact for the provision of a credit intermediation service with Luis Miguel Filipe, Lda, legal person with NIPC 515604178, with registered office at Rua Francisco Pereira de Oliveira, Ed. Glória 13D, 5 Esq, 2495-421 Fátima, within the scope of which personal data of which you are the holder will have to be collected and processed, it is important to inform you of the following:

## 1. IDENTIFICATION OF THE DATA CONTROLLER:

<b>Name:</b>	LUIS MIGUEL FILIPE, LDA
<b>Address:</b>	Rua Francisco Pereira de Oliveira, Ed. Glória 13D, 5 Esq, 2495-421 Fátima
<b>Email:</b>	LUIS.FILIPE@LVF.PT
<b>Telephone Contact:</b>	00 351 96 356 92 59

## 2. PERSONAL DATA COLLECTED

The personal data collected by the Data Controller from the client is as follows:

- Identification data (full name, date of birth, identification document number, tax number);
- Contact details (telephone, email, fax and address numbers);
- Bank details (IBAN, BIC, account statements, debt declarations);
- Tax data (tax returns, tax assessment slips, etc.);
- Salary details (payslips, employment contract or other proof of salary);
- Documentation related to the property to be purchased, such as energy certificates, land registry, which contains, among other information, the property's address, asset value, areas and personal details of the owners.

In the event of changes to the data collected, this Privacy Policy will be duly updated.

In the event of personal data being collected from children, the Data Controller will take all necessary measures to ensure that the child has access to the legally required information in a clear and simple manner, and will only process this data on the basis of their consent if they have reached the age of 13.

If the child has not yet reached the age of 13, their data can only be processed if consent is given by their legal representatives, preferably using secure authentication means.

## 3. PURPOSE FOR PROCESSING THE DATA COLLECTED

The Client's personal data is collected primarily for the purpose of providing the credit intermediation service requested by the Client from the Data Controller (legal basis provided for in Article 6<sup>th</sup>, nº1, a) of the GDPR), which necessarily includes the transfer of this data to Credit Institutions so that they can analyse the Client's legal and financial situation and thus decide on the terms of granting bank credit. In view of the above, by providing their personal data to the Data Controller, for the purposes of establishing a credit intermediation relationship, the Client accepts that their data will be processed, and that failure to agree to this implies the impossibility of providing the service desired by the Client.

The Client's personal data is collected secondarily for the purpose of providing insurance support services (legal basis provided for in Article 6<sup>th</sup>, nº1, a) of the GDPR), which necessarily includes the transfer of this data to one or more insurance brokers, intermediaries and/or insurers, so that they can analyse the Client's situation and thus propose and decide on the terms of acceptance of the risk. In view of the above, by providing their personal data to the Data Controller, for the purposes of the above mentioned services, the Client accepts that their data will be processed, and that failure to agree to this implies the impossibility of providing the service desired by the Client.

The Data Controller uses a set of computerised Customer Relationship Management (CRM) tools, which may be managed by itself or by third parties at any given time. The following client data is recorded in these tools at all times:

- Full name;
- Tax number;
- Credit operation details (loan amount, bank, deed date, loan number, etc.);
- Property data;

Under no circumstances will the data collected be used for a purpose other than those established by law or for which the client has given their consent. Therefore, if the Data Controller intends to process the personal data provided by the Client for another purpose, it will always ask for the Client's consent in advance.

## 4. RECIPIENTS OF PERSONAL DATA

For the purposes of executing the credit intermediation contract entered into between the parties, the Data Controller will transfer the Client's personal data to the Financial and Credit Institutions, a list of which can be consulted on the website <https://www.bportugal.pt/>

The client can also obtain information on the entities to which the Data Controller will transfer their data (all based in the EU) by sending an e-mail to the e-mail address provided in point 1.

If the Client gives their consent, the financial and credit institutions with whom the credit intermediary has established commercial partnerships may consult the information about them contained in the Central Credit Register as well as in the List of Bank Check Users offering Risk, both of which are available from the Bank of Portugal, in accordance with the applicable legislation and regulations.

## **5. PERSONAL DATA RETENTION PERIOD**

The period during which the data is stored and kept varies according to the purpose for which the information is processed and according to any applicable legal obligations and requirements that require the data to be kept for a minimum period of time.

Therefore, and whenever there is no specific legal obligation, the data will only be stored and kept for the minimum period necessary for the purposes for which it was collected or subsequently processed, after which it will be deleted.

More specifically:

- a) Personal data that is collected for the purposes of the credit intermediation contract shall be kept for a period of 12 (twelve) months after the end of the contractual relationship established with the Client, without prejudice to its retention beyond that period in the event of pending legal proceedings, in which case the data shall be deleted after 3 (three) months from the date of the final judgement handed down in the context of such proceedings.
- b) Personal data collected for insertion into the Customer Relationship Management (CRM) system(s) will be kept for a period of 10 years, or until the consent on the basis of which it is processed is withdrawn.

## **6. DATA SUBJECT RIGHTS**

The holders of the personal data collected are guaranteed the right to ask the data controller for access, rectification, erasure or restriction of the processing of personal data concerning them, as well as the right to object to the processing and the right to data portability.

In cases where express consent has been given for the collection and processing, clients have the right to withdraw this consent at any time, simply by sending an e-mail with this indication to the above e-mail address. In this case, the client is hereby informed that the revocation of consent only has future effect.

In the event that you wish to exercise these rights or for any other additional questions regarding data protection and processing, you should contact the Data Controller in writing via the contact details above.

If the Data Controller has reasonable doubts as to the identity of the natural person submitting the request, he/she may request that additional information be provided to confirm the identity of the client.

In addition, if at any time you feel that your rights have not been duly safeguarded, you can lodge a complaint with the National Data Protection Commission, whose contact details can be found on the website <https://www.cnpd.pt/>.

I declare that I have read and understood the present Privacy Policy, in the version made available through the digital platform, and that the authorisations selected below represent my explicit and informed choice.

- A)** With regard to the possibility of financial and credit institutions with whom the credit intermediary has established commercial partnerships consulting information about me in the Central Credit Register as well as in the List of Bank Check Users offering Risk, both of which are available from the Bank of Portugal, in accordance with the applicable legislation and regulations
  
- B)** I authorise the transmission and processing of my personal data to financial and credit institutions with whom the credit intermediary has established commercial partnerships for the purpose of these credit institutions analysing the application for the granting of credit and presenting me with a financing proposal; the decision to be taken by the credit institutions on the credit proposal may be presented to me by the credit intermediary in this consent.
  
- C)** I also authorise the same financial institutions to transmit to the credit intermediary, in the event that the credit granted provides for release in instalments during a previously agreed period of use, information on the release of the various instalments as the amount granted is used up.
  
- D)** I authorise the transmission and processing of my personal data to one or more insurance brokers, intermediaries and/or insurers, for the purpose of these entities presenting insurance proposals, which may be presented to me by the credit intermediary in this consent