



## Personal Data Protection and Privacy Policy

While providing services DSTELECOM, S.A. needs to regularly collect personal data, such as but not only, name and address, from our clients.

On the other hand, the evermore frequent client interaction with our web site also requires, in some cases, collecting user's personal information in order to confirm coverage and services provided by companies in the group dst telecommunications sgps sa. Likewise, personal information may be collected from your computer through small files known to the general public as cookies so that we may monitor service quality, traffic data retention, billing and legal management.

The Personal Data Protection and Privacy Policy helps you understand how we collect, use and protect your personal information when you use our services or visit our web site.

You may obtain additional information or clarify any doubts about this Privacy Statement and our Treatment of Personal Data, simply by sending your questions to:

DSTELECOM, S.A..

c/o Personal Data Privacy and Processing Agent

Rua de Pitancinhos, s/n – Palmeira

4700-727 Braga

or email us: [dpo@dstelecom.pt](mailto:dpo@dstelecom.pt)

DSTELECOM is committed to protecting the privacy of its Customers when using its products and services, as well as when developing technology that offers the best and safest online experiences.

Users are given the opportunity to browse our website without having to provide personal information. However, information is sometimes required to provide services requested by users and Customers.

This Personal Data Protection and Privacy policy helps you understand how we collect, use and protect your personal information when you visit our web site and when you generally use our products or services.

Willingly providing personal data to DSTELECOM, the Client acknowledges that the information is processed in accordance with this policy and with the guiding principles contained in the respective terms and conditions of the services used. To this extent and with respect to the processing of personal data, you must read document in conjunction with the Terms and Conditions governing the offer of the various DSTELECOM products and services. If we intend to make any changes to this policy, we will post those changes on this page so that you can consult the type of information we collect and how we use it.

## DEFINITIONS

	sede	delegação	
	<p>dstelecom, s.a. Rua de Pitancinhos Apartado 208 Palmeira 4711-911 Braga Portugal t + 351 253 109 500 f + 351 253 307 278</p>	<p>dstelecom, s.a. Rua do Alecrim Nº75 - 2º Andar 1200-015 Lisboa Portugal t + 351 213 429 131 f + 351 213 427 024</p>	<p>geral@dstelecom.pt www.dstelecom.pt</p> <p>MCRC Braga/NIF 508 533 457 Capital Social 50.000,00€ Alvará Nº 86176 – PUB</p>



## WHAT IS PERSONAL DATA?

Personal data is any information relating to an identified or identifiable natural person ('data subject') in any form (i.e sounds or images).

An identifiable individual ('natural person') is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors that allow the identification of that individual;

## WHO OWNS PERSONAL DATA?

The Customer or User, an individual, to whom the data relate and who has used the services or products of DSTELECOM.

The Customer will be the person who enters into binding contract with DSTELECOM and the User is the person who uses the services or products of DSTELECOM, but may not correspond to the Customer.

For example:

- When the contract with DSTELECOM is in the company's name but the Users are the clients or employees of that company.

In this regard DSTELECOM informs that it protects equally personal data and highly respects the rights of customers and users alike.

## WHAT CATAGORIES OF PERSONAL DATA DO WE PROCESS?

- **Identification and contacts**  
ex. Civil or tax identification numbers, data for payment, billing / installation address, telephone contact or e-mail address;
- **Other Identifying data**  
Ex. Date of Birth or gender.
- **Service**  
ex. Products and services purchased or subscribed to.
- **Profile and Interests**  
ex. Interests in DSTELECOM products or services, movies, series, music, sports, soccer club, social networks, or other preferences and interests.
- **Service Usage Information (trafficking)**  
ex. Destination and origin numbers of outgoing calls, date / time of communication, duration of communication, IP address, mac address and data related to the taxation of products and services.
- **Location**  
Ex. Geographical reference of the customer or terminal equipment at a specific time or during the use of the services.
- **Content**



ex. Information included in customer's communication, such as voice and/or complete URLs of data sessions.

- **Usage Profile**

ex. Data resulting from product views, or type of calls made.

## FOR WHAT PURPOSE CAN DSTELECOM PROCESS YOUR PERSONAL DATA?

As a rule, personal data collected from Clients are intended for the provision and billing of the Services, for the management and evaluation of the contractual relationship with the Customer, for the adaptation of the services to the needs and interests of the Client, for the payment of the interconnection services, information, marketing or telemarketing activities OF DSTELECOM, associated companies or in a controlling position or group relationship with the DSTELECOM and third parties, including Customers on subscriber lists.

Your personal data will also be processed to answer your questions, suggestions or complaints.

Purpose	Examples
Marketing and Sales	Marketing or sales of new products or services. Analyze usage profile Adapt and develop new products and services
Managing Customer and Providing Service	Manage contacts, information and requests Manage installations, activations and shutdowns Manage complaints or malfunctions Manage billing, collection and payments. Analyze consumption Call recordings as proof of commercial transactions and communications within the contractual relationship Call recordings to monitor the quality of service
Administrative, Fiscal and Accounting Management	Accounting, invoicing Commission Management Tax information, which includes sending info to tax authority
Managing Litigation	Judicial and extrajudicial Collections Manage other conflicts
Detecting Fraud, protecting revenue and auditing	Detect fraud and other illegal activities Revenue protection and control Manage credit risks Internal audits and investigations.
Network and System Management	Upkeep and continually improve network and applications that support the service Monitor, improve and support the service.
Managing telecommunication operator	Manage interconnection service.
Complying with legal obligations	Locate emergency service calls Court orders to intercept communications Investigate, detect and prosecute serious crimes Respond to judicial, regulatory and supervisory entities
Information Security Controls	Manage access and logs Manage backups Manage security incidents
Physical Security Controls	Video surveillance system on the premises

## WHO IS RESPONSIBLE FOR PROCESSING THE PERSONAL DATA?

DSTELECOM, S.A. is responsible for processing the personal data.

## HOW LONG IS THE PERSONAL DATA STORED?



Your personal data is only stored for the period of time necessary to provide the service or product, or for DSTELECOM to comply with legal obligations.

Traffic data may be retained during a period in which the invoice can be legally challenged or payment claimed, or during the legally defined periods for investigation and prosecution of a criminal nature.

#### WHAT TYPES OF COOKIES ARE USED ON THE DSTELECOM WEBSITE?

**Strictly necessary Cookies:** allow you to navigate the web site and use the applications and services that DSTELECOM can make available, such as accessing safe areas of the web site. Without these cookies services cannot be provided.

**Analytical Cookies:** allow obtaining aggregated data for statistical analysis and website improvement.

**Functional Cookies:** allow easy and personalized navigation because they save user preferences regarding the website use, eliminating need to reconfigure with each visit.

**3rd Party Cookies:** some DSTELECOM website pages contain components made available by 3<sup>rd</sup> parties (ex: YouTube videos, Facebook, etc.) which use independent cookies not associated with DSTELECOM.

**Advertising Cookies:** allow directing advertising according to the interests of each user, by collecting internet navigation habits. Hence, the advertising displayed will match your needs.

Some cookies used on the web site will be automatically deleted from the device when you log out of the browser (called "session cookies"). Other types of Cookies will remain on your computer and allow the identification of the same on the next visit to the web site (called "permanent cookies").

#### WHAT METHODS OF MARKETING AND TELEMARKETING ARE USED?

To inform customers of new products and services, DSTELECOM may use the following means: Post or fax, place information on service invoice, telephone, e-mail, SMS, or any other electronic communication service, unless opposed by the customer.

In the Proposed Contract for providing Electronic Communications Services, you may deny authorizing your personal data processing for Marketing or Telemarketing purposes.

Customer may refuse his / her consent at any time by sending request to:

DSTELECOM, S.A.

c/o Personal Data Privacy and Processing Agent

Rua de Pitancinhos, s/n - Palmeira

4700-727 Braga

or email us: [dpo@dstelecom.pt](mailto:dpo@dstelecom.pt)

#### WHAT ARE THE CUSTOMER'S RIGHTS?

Right to access, correct, oppose and eliminate personal data.

According to applicable legislation, the Customer is guaranteed the right of access to data that directly concern him or her, and may request its correction or addition by contacting the DSTELECOM personal data agent for this purpose.



The Customer may also at any time oppose data processing, except for those strictly necessary to provide the service, and / or require deletion of its data for marketing or telemarketing purposes or inclusion in lists of subscribers and services information, and for this purpose contact the DSTELECOM, in writing or via email: [dpo@dstelecom.pt](mailto:dpo@dstelecom.pt).

### **Right of Access**

Right to access which of your personal data is processed and information about them, such as, what is the purpose of the processing, what are the storage periods, among others. Right to see / hear or obtain a copy, for example of invoices, written agreements or calls in which you partake in and recorded.

### **Right of Correction**

Right to request correction personal data which is inaccurate or request the completion of incomplete personal data, such as the address, NIF, e-mail, telephone contacts, or others.

### **Right to eliminate data or “Right to be forgotten”**

Right to obtain erasure of your personal data, provided that there are no valid grounds for its retention, such as the cases in which DSTELECOM has to keep the data in order to fulfill a legal obligation of preservation for investigation, detection and repression of crimes or because a legal process is in progress.

### **Right to Portability**

Right to receive data provided to DSTELECOM in digital format for automatic transmission or to request the direct transmission of your data to another entity that is responsible for your personal data, such as receiving your invoices or transmitting your contacts to the new in this case only if technically possible

### **Right to Revoke Consent or Right of Opposition**

Right to oppose or withdraw consent at any time to data processing, such as in the case of data processing for marketing purposes, provided that no legitimate interests prevailing over their interests, rights and freedoms, such as defending a right in a judicial process.

### **Right of Limitation**

Right to request limits to the processing of your personal data in the following ways:

- (i) Suspend processing or
- (ii) Limit the scope of processing certain categories of data or specific processing purposes.

### **Profile and Automatic Decisions**

DSTELECOM may create customer profiles based, for example, on their preferences, personal interests, use of service, location, etc., in particular to provide services, increase the quality and experience of products and services, such treatment is necessary for the conclusion or execution of the contract between the holder and DSTELECOM or based on the consent of the holder.

When personal data processing, including profiling, is exclusively automatic (without human intervention) and can have effects legally or significantly affect one, the customer has the right not to be subject to any decision based on that automatic treatment, except as provided by law, and shall have the right to have DSTELECOM take appropriate measures to safeguard one's rights and freedoms and legitimate interests, including the right



to have human intervention in decision making by DSTELECOM, the right to express their point of view or contest the decision taken on the basis of the automatic processing of personal data.

### **Right to complain**

Right to submit a complaint to the supervisory authority, the NCDP (National Commission for Data Protection), in addition to the company or the DPO.

### **HOW CAN YOU EXERCISE YOUR RIGHTS?**

Exercising your rights is free of charge, unless it is a manifestly unfounded or excessive request, in which case a reasonable fee may be charged against costs. The information shall be provided in writing but may be given orally if requested. In this case, DSTELECOM must verify its identity by means other than oral. The response to requests should be made within a maximum period of 30 days, unless it is an especially complex request.

#### **Exercise your rights via:**

Post: DSTELECOM, S.A. – c/o Personal Data Privacy and Processing Agent

Address: Rua de Pitancinhos, s/n – Palmeira – 4700-727 Braga

E-mail: [dpo@dstelecom.pt](mailto:dpo@dstelecom.pt)

Telephone: 253 109 500

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