

## **INFORMATION ON PERSONAL DATA PROTECTION - FIDELIDADE PROPERTY**

This information on the protection of personal data (hereinafter “**Information**”) applies to the collection and processing of personal data provided by users accessing this *website*, including, in particular, those collected through forms, documents or other means intended to enable contact with **Fidelidade - Property Europe, S.A.**, legal person n.º 502745711, registered with the Commercial Registry Office of Lisbon, under the same number, with registered office at Largo do Calhariz, n.º 30, 1249-001 Lisboa, and with share capital of 56.953.825,00 Euros, hereinafter referred to as “**FPE**”, as well as the exercise of rights by the user in relation to this data, under the terms of the applicable legislation.

### **1. DATA CONTROLLER**

FPE is responsible (Data Controller) for processing the personal data provided by the respective data subject, as well as those that have been or will be provided by any other means or methods, directly or through third parties, or that are generated by FPE itself, in the context of prior contacts or the conclusion, execution, renewal or termination of contracts, or in the context of the use of the website, the provision of services or the relationship with customers, beneficiaries, their representatives, as well as other third parties, hereinafter “**Personal Data**”.

The provision to FPE of Personal Data collected in the context of pre-contractual procedures or in the contracting process, in addition to the cases in which they constitute information necessary to comply with legal obligations, constitutes a necessary requirement for pre-contractual procedures and, as well, for the conclusion of any contracts, so that, in the event that they are not provided to FPE, it may not be possible to establish any contractual relationship.

Personal Data will be processed by FPE for the purposes listed in point 3 below, in strict compliance with the legislation in force on the protection of personal data.

### **2. DATA PROTECTION OFFICER**

The Data Protection Officer can be contacted in writing at the following addresses:

- Largo do Calhariz, n.º 30, 1249-001 Lisboa;
- [epdp@fidelidade.pt](mailto:epdp@fidelidade.pt)

### **3. PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA AND CRITERIA FOR SETTING THE RESPECTIVE RETENTION PERIODS**

The Personal Data is processed for the following purposes based, in each case, on the legal grounds indicated in the table below and is retained for the time strictly necessary to achieve the same purposes, in accordance with the time periods (or the criteria used to define them):

Purpose	Legal basis	Retention Period
- Management of the pre-contractual and contractual relationship, including quality control of the services provided.	- Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; - Legitimate interest of the data controller in assessing proposed risks and level of service quality. - Compliance with legal obligations.	- Until the expiry of the legal limitation period for all obligations arising from the contract after its termination (without prejudice to the duty to keep the Personal Data necessary to invoke the limitation period after the expiry of the limitation period).
- Risk management and internal control activities, such as management control activities, implementation of preventive and anti-fraud actions, ensuring alignment with current regulations.*	- Compliance with legal obligations. - Legitimate interests of the controller to control its activity, including the prevention of fraud losses. - To assert, exercise or defend rights in legal proceedings.	- Legal period applicable at any given time for each legal obligation to be fulfilled. - Until the expiry of the limitation or prescription period for the exercise of rights.
- Marketing	- Consent of the data subject., - Legitimate interests in the development and growth of the data controller's activity	- Until the expiry of three years from the end of the contractual relationship, or until the data subject exercises their right to object, as applicable.

\*For example, **tax declarations and regulatory reports:**

**Prevention and Combating of Fraud:** data analysis for proactive detection of suspicious patterns that may indicate fraudulent activities, implementation of security measures and verification protocols to minimize fraud risks, among others.

**Internal and External Audits:** facilitating internal and external audits, ensuring compliance with legal and regulatory standards, and providing the necessary data and documentation to meet the auditors' requirements.

**Risk Management and Internal Control:** use of data for risk assessment and management, ensuring compliance with legal and regulatory standards, and implementation of internal controls to guarantee the integrity and security of Personal Data.

#### 4. CATEGORIES OF DATA

Within the scope of the activities carried out by FPE, **various types of personal data may be processed**, namely:

- Identification and contact details;
- Data collected through communications with FPE.

## **5. DATA DISCLOSURE**

Personal Data may be disclosed to:

Companies that are part in the same group or under common control with FPE, for internal administrative purposes related to client management, including litigation management, fraud prevention and control or incidents and irregularities.

- Data processors subcontracted by FPE, such as service providers (e.g., real estate agents, IT providers, auditors, consultants, etc.).
- Supervisory, regulatory or tax authorities, as well as judicial and administrative authorities for the purpose of complying with legal obligations applicable to FPE at any given time, or for the establishment, exercise or defense of rights in legal proceedings.
- Associative Entities, such as the Portuguese Association of Real Estate Developers and Investors (“APPII”), that lawfully carry out data compilation actions, fraud preventions and combating actions, market, statistical or technical studies.

## **6. INTERNATIONAL TRANSFERS OF PERSONAL DATA**

The disclosure of Personal Data to the entities referred to in section 5 mentioned above may involve the transfer of Personal Data to countries located outside the European Economic Area (“EEA”).

In such cases, the international transfer will be:

- Carried out to countries whose level of Personal Data protection has been deemed adequate by the European Commission; or
- Carried out to countries not covered by an adequacy decision, if it is ensured that the recipient entities comply with all applicable legal obligations in the field of data protection, acting solely based on the documented instructions given by the Data Controller. This includes the conclusion of a personal data processing agreement that complies with the Standard Contractual Clauses adopted or approved by the European Commission, as well as the implementation of complementary measures where necessary.

Detailed information on the security measures implemented by the Data Controller for transfers of Personal Data outside the EEA may be requested, as well as, where applicable, a copy of the standard data protection clauses in force, and any additional measures adopted. Such requests may be made by contacting the Data Protection Officer at the following email address: [epdp@fidelidade.pt](mailto:epdp@fidelidade.pt).

## **7. COLLECTION OF DATA FROM OTHER SOURCES**

Personal Data may be collected directly from the data subject, when providing identification and contact details to submit a contact request.

FPE may also collect information about the data subject that is relevant for risk assessment and the determination of contractual conditions from publicly accessible sources, public authorities, industry associations or specialized companies. This is done to complement or verify the information provided by the data subject, within the scope of the purpose of managing the pre-contractual and contractual relationship.

## **8. DATA SUBJECT RIGHTS**

To exercise any of the rights listed below, the request must be made through the Data Subject Portal, available [here](#), or by contacting the Data Protection Officer by e-mail: [epdp@fidelidade.pt](mailto:epdp@fidelidade.pt).

The data subject has the right to request FPE:

- Access, under the terms and conditions legally provided, to the Personal Data concerning them that is being processed by FPE;
- Rectification or updating of inaccurate or outdated Personal Data concerning them;
- Completion of incomplete Personal Data, where applicable;
- Erasure, in the cases specifically provided for by law, of Personal Data concerning them;
- The restriction, under the conditions laid down by law, of the processing of Personal Data concerning them;
- Withdraw of consent given when data processing is based solely on consent given by them;
- Object to processing on grounds relating to their particular situation, when the processing is based on the legitimate interest of the Data Controller;

To receive from the Data Controller, in a commonly used and machine-readable digital format, the personal data concerning them which they have provided and processed by automated means on the basis of:

(a) consent given by the data subject; or,

(b) based on a contract entered into with the data subject, and may request, in writing, the direct transmission of such data to another controller, whenever this proves technically possible.

The data subject may also request more detailed information from the Personal Data Protection Officer, including the information on the purposes of processing, legal basis and retention periods. In addition, the data subject can submit complaints about the way in which their Personal Data is processed, without prejudice to their right to file a complaint with the competent Supervisory Authority.

## **9. COOKIES**

FPE uses cookies on its websites to improve the user experience and enable certain operations to be performed securely. The Cookies Policy can be consulted [here](#).

## **10. SECURITY OF PERSONAL DATA**

FPE adopts appropriate technical and organizational measures to protect Personal Data against accidental or unlawful loss, destruction or damage, as well as to ensure that the data provided is safeguarded against unauthorized access or use by third parties.

FPE ensures the privacy and security of the data transmitted by its clients and visitors to its websites, using SSL (Secure Sockets Layer) encryption for all information exchanged via the website.

## **11. CHANGES TO THE INFORMATION ON PERSONAL DATA PROTECTION**

This information may be updated periodically through publication on the FPE website, without the need for prior and express consent of the data subject.

Any significant changes will be communicated with the degree of publicity corresponding to their relevance, either by highlighting them in the online publication or, if justified by the importance of the change, through individualized communication to the data subjects.

## **12. PREVALENCE OF THE PORTUGUESE VERSION CLAUSE**

In the event of any divergence, conflict or ambiguity between the different language versions of this document, the Portuguese version shall prevail.

Last updated version: June 2025