

Customer Privacy Policy

1. Our commitment

For the Adviser Platform, Lda (hereafter "APL"), privacy and protection of its clients' personal data and the data of any other data subjects are of key significance.

Therefore, APL is committed to complying with all applicable legislation on matters of personal data protection, upholding fundamental principles and data subjects' rights. This Privacy Policy complements other contract provisions and information that may be provided by APL to its clients, as well as other policies and directives that may be created for the purpose of data protection. APL recommends that you read this Policy as well as other documents that may be provided or relayed to you on the privacy and protection of your personal data; document updates will be made available on [adviserplatform.com](https://www.adviserplatform.com).

To get to know the entities operating under the APL, please visit <https://www.adviserplatform.com/entities>

2. The APL position on processing your personal data

The entity responsible and accountable for data processing will be the company, APL, which provides services and products to you and, as such, decides on the data to gather, processing methods and purposes for your data, in the cases identified by item 4 below. In certain cases, APL will act as a subcontractor, processing your data on behalf of another entity that shall be the one accountable for data processing, which will happen namely with insurance companies when APL provides them services connected with the management and execution of an insurance contract to which the data subject is a party (for example, for claims management).

In such cases, we recommend that you read the privacy policy and/or any other information on the processing of your data provided by the entity that is accountable for data processing.

3. Essential Concepts

a) What is personal data?

Personal data is any information of any nature, on any medium, concerning a natural person, identified or identifiable. Identifiable is any person that may be identified, directly or indirectly, and particularly with reference to an identifier, such as a name, an identification number, location data, electronic identifiers, or one or more specific elements of physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

b. Who are the data subjects of the personal data processed by APL?

Data subjects are the natural persons whom the personal data concerns. For example, as the entity responsible for processing, APL may process personal data whose data subjects are its clients (natural persons) that purchase services and products from APL; its former clients; and its potential clients. As a subcontractor, APL may process personal data whose data subjects are policyholders, beneficiaries, or insured persons, according to a given insurance contract, or persons named witnesses in the event of a claim.

c. What personal data does APL process?

APL only gathers and processes data as necessary to provide quality service to you, to provide products and services that best address your needs and perform to the highest standard any service you may have contracted, and to comply with its obligations as a subcontractor.

APL will also process personal data necessary to fulfilling legal obligations it is subject to, or to pursue its own legitimate interest. As a service provider, APL processes the following personal data categories:

- Identification data related to the policyholder, persons insured, injured parties and beneficiaries, as applicable (e.g., name, address, place of birth, nationality, citizenship/double citizenship, national identity card number, gender, date of birth, phone number, email address, tax ID number, marital status, occupation);
- Claims records in the lifeline (e.g., death certificates and records, inheritance claims, medical reports, funeral directors' receipts, accident reports, autopsy reports, drug and alcohol test reports, payment order to be filled by beneficiary, proof of IBAN);
- Claims records in the health line (e.g., insured's medical history, medical reports, support documents for claim regularization);
- Claims records in the workplace accident line (e.g., date insurance was activated and accident description, remuneration, premiums, extras, gratifications, food allowance, support data for claim regularization);
- Claims records in the personal accident line (e.g., accident description, medical information, support documents on the accident, legal beneficiaries);
- Claims records in the auto line (e.g., Auto DAA accident report data, identification of injured third parties, witness identification);
- Claims records in other lines (e.g., accident report data);
- Identification data for the insured object (e.g., vehicle type, aircraft type, vessel type, registration number, brand/make, model, year of manufacture, chassis number, registration date, cylinder capacity, number of seats,

engine power, policy number, identification of other insured objects, such as jewellery, artworks, household, household effects or animals);

- Charge/collection data (e.g., NIB/IBAN, Swift code, signature, account holder, address, policy number);
- Health and lifestyle data (e.g., lifestyle information, such as eating habits, sports, alcohol consumption, smoking habits, biometric indicators, clinical history); and
- Records of telephone call data (e.g., records and recordings of telephone call, including voice recordings and telephone number records).

APL also processes these personal data categories where the data subjects are underage.

APL only processes the special data categories indicated above, meaning, data pertaining to your health, biometric data or genetic data, as a subcontractor.

4. Reasons to process your data, and when

a) Data processing when APL is accountable for processing Wherever APL is accountable for data processing, it only processes personal data in the following situations:

i. To perform the terms of a contract with you or to pursue pre-contract diligence and efforts at your request

To render services and provide products the client may wish to contract, APL may need to process your personal data. This will occur, for instance, in the following cases:

- Record and proof of commercial transactions and pre-contract information, which includes, among others:
 - answers to requests for information originated by clients or potential clients.
 - requests for estimates so we may quote/propose insurance policies.
- Monitoring contract execution and performance, which includes, among other things, quotes on insurance policies in accordance with the client's interests.

ii. Compliance with legal obligations APL must adhere to

While conducting its business, APL is bound by legal and statutory obligations the adherence to which may entail the need to process your personal data:

- For tax withholding purposes, tax payments or reports for tax purposes.
- To comply with legal obligations originated by requests from the authorities (e.g., Insurance and Pension Fund Supervisory Authority, and Courts of Law);
- To comply with procedures on matters of prevention and combat against money laundering and funding for terrorism.

iii. To pursue APL's own interests

APL uses your personal data to develop, improve and promote its services and protect its legal rights and interests, including:

- Improvement of service quality, which includes:
 - conduction of market surveys.
 - analysis of customer service on telephone calls.
- Marketing and communication, which includes:
 - sending communications to clients and former clients on APL products and services.
 - analysis and management of requests made over websites and other channels.
- Management of complaints and monitoring of legal proceedings, which includes:
 - analysis and monitoring of complaints registered by clients about APL services.
 - analysis and monitoring of contentious cases that APL is a party to.

iv. To satisfy your own choices

APL will also process your personal data when you have provided explicit prior consent to that end, and when that consent meets all legal requisites. This will occur in the following cases:

- Commercial prospecting (e.g., communication on APL products and services to people who are not clients or former clients of APL),
- Improvements to Service Quality (e.g., when we record telephone calls).

b) Data processing as a subcontractor

When APL acts as a subcontractor, meaning, on behalf of other entities, specifically insurers, the purpose of personal data processing will be determined by such entities as the ones accountable for the processing. In such cases, APL will process your personal data only to those purposes and in accordance with the instructions conveyed to it by the entities accountable for data processing.

5. Transfer of personal data and possible recipients for your personal data

For APL to fulfil all its duties and provide you with the best possible service, you may have to communicate, or give other entities access to your personal data. APL will only communicate or give access to your personal data to the following entities:

- Service providers that render services to APL (e.g., services contracted with third parties for the provision of data centre management services);
- To insurance and reinsurance companies with which insurance or reinsurance contracts have been entered; and
- Public authorities such as the Tax Authority or Courts of Law

APL will only communicate personal data indispensable to the provision of contracted services or indispensable to the fulfilment of legal obligations it is subjected to. In some cases, APL may have to carry out international transfers of your personal data (i.e., to territories outside the European Union).

Should the European Commission declare through an adequacy decision that the country located outside the European Union in question guarantees a level of data protection equivalent to that arising from European Union legislation, the data transfer will have such an adequacy decision for its basis.

You may look up existing adequacy decisions at www.eur-lex.europa.eu.

In cases where data transfers are made to countries or organizations outside the European Union for which there is no adequacy decision by the Committee, APL will ensure that these data transfers strictly comply with legal statutes and that adequate guarantees be implemented to ensure the protection of your data.

6. For how long is your data processed and kept?

APL will only process your personal data for the ends stated above and only during the period necessary to fulfil those ends.

The following are the periods during which we keep your personal data:

Purpose	Type of Data	Period Kept
Record and Proof of Commercial Transaction and Pre-Contract Information	Telephone call recording data; identification data for policyholder and insured persons, injured parties, and beneficiaries; identification data for insured object.	General: 90 days counting from the date of call recording; When contracts are entered into remotely, the applicable period is the contract length, and we may add to this period as much time as necessary to fulfil all the obligations arising from the contract.
Monitoring of contract management and execution	Identification data for policyholder, insured persons and beneficiaries; identification data for insured object.	Contract duration.
Commercial prospecting	Identification data for data subject, insured persons and beneficiaries; identification data for insured object.	1 year, counting from the date of contact with data subject.
Marketing and communication	Identification data for data subject, insured persons and beneficiaries; identification data for insured object.	1 year after contract expiration or after contact through APL worksites.
Management of complaints and monitoring of legal proceedings:	Identification data for the policyholder, insured persons, injured parties and beneficiaries; claim record data in the lifeline; claim record data in the health line; claim record data in the workplace accident line; claim record data in the personal accident line; claim record data in the auto line; claim record data in other lines; health and lifestyle data.	While legal dispute or claim are ongoing.
Improvements to service quality	Identification data for policyholder, insured persons and beneficiaries; telephone call recording data.	General: 1 year. If we record telephone calls, the recordings will be kept for a period of 90 days.

Fulfilment of Legal Obligations	Identification data for policyholder, insured persons and beneficiaries, payment data	10 years for the fulfilment of tax obligations. 7 years for the fulfilment of obligations on matters of prevention of money laundering and terrorism funding.
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Do not hesitate to contact APL through the usual channels if you have questions. These are listed on 8.b below.

7. Automated Individual Decisions

APL does not make automated individual decisions, meaning, decisions made exclusively based on automated processing of your personal data that will have legal effects or will significantly impact you in a similar way.

Should APL adopt this decision method, you will be informed of the fact, as well as the logic underlying those decisions and the importance and possible consequences to the data subject arising from that treatment.

8. Data subjects' rights

a) What rights do you have about the processing of your personal data?

i. Right of access

Whenever you request it, you will have the right to obtain confirmation on whether your personal data is processed by APL, as well as information pertaining to that processing (e.g., to what purpose data is processed, who the recipients are, and how long we keep your data). You also have the right to obtain a copy of your personal data that have been the object of processing by APL.

ii. Right of rectification

Whenever you consider that your personal data is incorrect or incomplete, you may request that it be rectified or completed.

iii. Right of erasure

Under certain circumstances, you may request the erasure of your personal data. In such cases, APL will erase your data unless the data is necessary to some of the following purposes:

- exerting freedom of speech and information;
- fulfilment of legal obligation, that applies to APL, demanding processing;
- public interest motives in the public health domain.
- public interest archiving purposes, scientific, historical or statistic research insofar as the exertion of the right of erasure gravely impedes the fulfilment of the objectives of such processing; or
- assertion, exercise or defence of a right in a legal proceeding.

iv. Right to restriction of processing

In certain cases, you may ask APL to restrict access to personal data or suspend processing activities. This will happen where, for example, you contest the accuracy of your personal data during a period allowing APL to check their accuracy, or where you have opposed processing, until it is verified whether the legitimate interests of APL prevail over yours.

v. Right to data portability

In the cases provided for by applicable legislation, you have the right to receive your personal data that you have provided to APL, in a structured, current, automatically readable format. You also have the right to ask APL to transfer such data to another processor if the transfer is technically possible.

vi. Right to object

You have the right to object to the processing of your personal data at any time, for motives connected with your own circumstances, when such processing is based on the legitimate interests of APL or when processing is conducted with purposes other than the ones for which the data has been collected but are compatible with the original purposes for data collection.

APL, in such circumstances, will stop processing your personal data unless it has legitimate motives to conduct processing and such motives prevail over your own interests. You may also object, at any moment, under no obligation to justify your decision, to the processing of your data for the purposes of direct marketing.

vii. Right not to be subject to automated decision-making APL does not undertake automated decision making, including profile definitions, that will have effects in your legal circumstances or affect you significantly in a similar fashion.

viii. Right to withdraw consent

Where data processing is conducted based on your consent, you may withdraw your consent at any time.

Should you withdraw your consent, your personal data will no longer be processed, except where grounds for continued processing exist, such as a contract, or APL's legitimate processing, that permit continued processing.

ix. Right to lodge a complaint with a supervisory authority

You have the right to lodge complaints with the pertinent supervisory authority on matters connected with the treatment of your personal data. In Portugal, the pertinent control authority is the Comissão Nacional de Protecção de Dados (National Data Protection Committee). To learn more, please visit www.cnpd.pt.

b) How can you exert your rights?

You can exert your rights over the following channels:

E-mail: You can exert your rights over email by writing to info@adviserplatform.com.

Online: You can exert your rights online at adviserplatform.com/politica-de-privacidade

By letter: You can exert your rights by letter address to Adviser Platform Lda, at the following address:
Avenida Mendes Silva 15, 3030-193 Coimbra, Portugal

Telephone: You can exert your rights by calling +351 214 669999. You will not be charged for exerting your rights.

9. Indirect collection of your personal data

It is possible that APL may have collected your personal data via third parties or other means even if you are not a client of APL's. This may happen whenever your contact details are supplied by a relative or a third party, when you are beneficiary to an insurance policy, when you are an employee of an APL client, or when you are a member of a governing body of a legal person that is a client of APL's. Whenever APL collects your data via third parties or other means, APL will endeavour to provide you with the information pertaining to the processing of your data at the earliest opportunity.

10. Security, technical and organizational measures

To guarantee the security of the personal data made available to APL, APL has implemented several security, technical and organizational measures to safeguard personal data against loss, destruction, alteration, publishing or unauthorized access to personal data and against any other form of illicit processing. Where APL contracts with other entities for the provision of services involving the sharing of personal data, these entities are obligated to implement the necessary technical and organizational measures so as to safeguard personal data against loss, destruction, alteration, publishing or unauthorized access to personal data and against any other form of illicit processing

11. Responsibility over services and websites

We recommend that you read the rules on the use of cookies by APL website. You may also read the APL Cookie Policy www.adviserplatform.com/politica-de-cookies/ APL websites may contain hyperlinks to third-party websites, products and services. APL does not have relationships with these third parties, nor are they bound by this Privacy Policy. APL therefore advises that you inform yourself of the rules established by such third parties on the processing of your personal data by addressing these third parties directly.

12. Stay up to date on the security of your personal data and processing by APL

The information on this document may have to be changed from time to time. Therefore, we recommend that you visit www.adviserplatform.com/politica-de-privacidade/, where such information will be kept updated at all times so you may stay current on the processing conducted on your data.

Whenever changes occur regarding the processing of your personal data, APL will inform you through its website, www.adviserplatform.com/politica-de-privacidade/ or through other habitual channels.

13. More information

You can access information on privacy, security measures and protection of personal data:

Cookie Policy, available at www.adviserplatform.com/politica-de-cookies/