

I. Personal Data Protection Policy

1. Introduction

Tailor Made Deal, Lda. (Berkshire Hathaway HomeServices Atlantic Portugal), headquartered at Estrada da Circunvalação, Quinta do Paizinho, n. ° 2-B, Armazém 4, 2790-194 Carnaxide, legal person n. 516289020 processing of personal data, respects the privacy and protection of personal data, namely of the users of our websites and social media, as well as suppliers and customers and, in the case of legal persons, their representatives.

The data provided by the different users are treated confidentially by BHHS Atlantic Portugal in accordance with the provisions of Law 58/2019, of 8 August, the recommendations and directives issued by the National Data Protection Commission and the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

The monitoring of compliance with this Policy will be ensured by measuring the evaluation indicators of controls and/or audits (internal or external), at regular intervals or when significant legislative or regulatory changes occur.

BHHS Atlantic Portugal is committed to respecting the best practices in the field of security and protection of personal data, having for this purpose approved a program capable of safeguarding the protection of the data made available to us by all those who, somehow relate to it.

This Privacy Policy applies to the collection and processing of personal data carried out by BHHS Atlantic Portugal and is intended for the general public and establishes obligations for all employees.

2. Definitions

Personal data

All information relating to an identified or identifiable natural person; an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, identifiers electronically or to one or more specific elements of the identity physical, physiological, genetic, mental, economic, cultural or social status of that natural person.

Special Categories of Personal Data

Personal data revealing the racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership of a natural person, as well as the processing of genetic data, biometric data to uniquely identify a person, data relating to health or data relating to sex life or sexual orientation.

Treatment

It is the operation or a set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, registration, organization, structuring, conservation, adaptation or alteration, recovery, consultation, use, disclosure by transmission,

dissemination or any other form of making available, comparison or interconnection, limitation, erasure or destruction.

Responsible for Treatment

It is the natural or legal person, public authority, agency or other body that, individually or jointly with others, determines the purposes and means of processing personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria applicable to his/her appointment may be provided for by Union or Member State law.

Personal Data Violation

It is a breach of security that accidentally or illicitly causes the destruction, loss, alteration, disclosure or unauthorized access to personal data transmitted, preserved or subjected to any other type of treatment. Subcontractor

It is a natural or legal person, public authority, agency or other body that processes personal data on behalf of the person responsible for processing them.

Third

It is a natural or legal person, the public authority, the service or body that is not the data subject, the controller, the processor and the persons who, under the direct authority of the person responsible for the processing or the processor, are authorized to process personal data.

Control Authority

Independent public authority created by a Member State.

CNPD National Data Protection Commission.

3. Collection and Processing of Data from the Holder

This Policy applies to all personal data of users that are collected by BHHS Atlantic Portugal for (i) Institutional information (ii) information to customers and potential customers and scheduling of visits to properties (iii) information about the existence of promotions or marketing campaigns (iv) contractual or pre-contractual management or (v) to comply with legal obligations. Within the scope of activities developed by BHHS Atlantic Portugal, users may be contacted for the purposes described above.

The types of personal data collected, processed and stored by BHHS Atlantic Portugal are those necessary to (i) obtain information about properties and schedule visits, (ii) provide services to customers and (iii) comply with legal requirements. , contractual and pre-contractual arising from the respective activity. Such information may include:

- Full name;
- Contact details (address, telephone number, email address);
- Birth date;

- Customer and/or supplier registration;
- User identification and password or PIN, if registered through the BHHS Atlantic Portugal website. Additionally, BHHS Atlantic Portugal may request types of personal data considered “sensitive”:
- National or tax identification number/social security number;
- Financial or bank account data;
- Information related to tax/fiscal situation;

4. Subcontracted Entities

Within the scope of processing the data of the holder, BHHS Atlantic Portugal uses or may use third parties, subcontracted by it, to, on its behalf, and in accordance with its instructions, proceed with the processing of the data of the holder, in strict compliance with the provisions of the law and this Privacy Policy.

These subcontracted entities will not be able to transmit the data of the owner to other entities without BHHS Atlantic Portugal having given, in advance and in writing, authorization to do so, being also prevented from contracting other entities without authorization for this purpose. BHHS Atlantic Portugal is committed to subcontracting only entities that present sufficient guarantees for the execution of the appropriate technical and organizational measures, in order to ensure the defense of the holder's rights.

All subcontracted entities are bound by a written contract in which the object, duration of treatment, nature, purpose of treatment, type of personal data, categories of data subjects and the rights and obligations of the Parties.

When collecting personal data, BHHS Atlantic Portugal provides the data subject with information about the categories of subcontracted entities that, in the specific case, may process data on behalf of BHHS Atlantic Portugal.

5. Data Collection Channels

BHHS Atlantic Portugal may collect data directly (i.e., directly from the holder) or indirectly (i.e., through partner entities or third parties). Collection can be made through the following channels:

- Direct collection: in person, by telephone or by e-mail or via the internet on this website by filling in the available forms;
- Indirect collection: through partners, external companies and official entities.

6. General Principles Applicable to the Data Processing of the Data Subject

In terms of general principles regarding the processing of personal data, BHHS Atlantic Portugal undertakes to ensure that they are:

- Object of a lawful, fair and transparent treatment in relation to the data subject;
- Collected for specific, explicit and legitimate purposes, not being further processed in a way that is incompatible with those purposes;

- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and updated whenever necessary, with all appropriate measures being taken so that inaccurate data, taking into account the purposes for which they are processed, are erased or rectified without delay;
- Kept in a way that allows the identification of the data subject only for the period necessary for the purposes for which the data are processed;

- Treated in a way that guarantees their safety, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, with appropriate technical or organizational measures being adopted.

The data processing carried out by BHHS Atlantic Portugal is lawful when at least one of the following situations occurs:

- The data subject has given his/her explicit consent to the processing of the data subject's data for one or more specific purposes;
- The processing is necessary for the performance of a contract to which the data subject is a party, or for pre-contractual measures at the request of the data subject;

- The processing is necessary for the fulfillment of a legal obligation to which BHHS Atlantic Portugal is subject;

- The processing is necessary for the defense of the vital interests of the data subject or another natural person;

- The processing is necessary for the purposes of the legitimate interests pursued by BHHS Atlantic Portugal or by third parties (unless the interests or fundamental rights and freedoms of the data subject that require the protection of personal data prevail).

BHHS Atlantic Portugal undertakes to ensure that the processing of the data subject of the holder is only carried out under the conditions listed above and with respect for the aforementioned principles.

When the data subject is processed by BHHS Atlantic Portugal based on the consent of the data subject, he/she has the right to withdraw his/her consent at any time. The withdrawal of consent, however, does not compromise the lawfulness of the treatment carried out by BHHS Atlantic Portugal based on the consent previously given by the data subject.

The period of time during which the data is stored and kept varies according to the purpose for which the information is processed.

Effectively, there are legal requirements that oblige you to keep data for a minimum period of time. Thus, and whenever there is no specific legal requirement, the data will be stored and kept only for the minimum period necessary for the purposes that motivated their collection or subsequent processing, after which they will be deleted.

7. Use and Purposes of Data Processing of the Owner

In general terms, BHHS Atlantic Portugal uses the data of the data subject for various purposes, namely scheduling a visit to a property, requesting information about properties or requesting contacts, as well as for the eventual realization of a real estate business.

The data of the holder collected by BHHS Atlantic Portugal is not shared with third parties without the consent of the holder, with the exception of the situations referred to in the following paragraph. In the event that the data subject contracts with BHHS Atlantic Portugal services that are provided by other entities responsible for the processing of personal data, the data of the data subject may be consulted or accessed by these entities, to the extent that this is necessary for the provision of said services.

Under the applicable legal terms, BHHS Atlantic Portugal may transmit or communicate the data of the holder to other entities in the event that such transmission or communication is necessary for the performance of the contract established between the holder and BHHS Atlantic Portugal, or to pre-contractual steps at the request of the holder, in case it is necessary for the fulfillment of a legal obligation to which BHHS Atlantic Portugal is subject or in case it is necessary for the purpose of pursuing the legitimate interests of BHHS Atlantic Portugal or of third.

In the event of a transmission of data from the holder to third parties, reasonable efforts will be made for the recipient to use the data in accordance with this Privacy Policy.

8. Implemented Technical, Organizational and Security Measures

To ensure data security and maximum confidentiality, BHHS Atlantic Portugal treats the information provided to us in an absolutely confidential manner, in accordance with its internal security and confidentiality policies and procedures, which are periodically updated. as needed, as well as in accordance with the legally prescribed terms and conditions.

Depending on the nature, scope, context and purposes of data processing, as well as the risks arising from the treatment for the rights and freedoms of the data subject, BHHS Atlantic Portugal undertakes to apply, both at the time of definition of the means of processing and at the time of processing itself, the necessary and appropriate technical and organizational measures for data protection and compliance with legal requirements.

It also undertakes to ensure that only the data necessary for each specific purpose of the treatment are processed and that such data are not made available to an indefinite number of people.

In terms of general measures, BHHS Atlantic Portugal adopts the following:

- Regular audits in order to assess the effectiveness of the technical and organizational measures implemented;
- Sensitization and training of personnel involved in data processing operations;
- Pseudo nomination and encryption of personal data, whenever justified;
- Mechanisms capable of ensuring the permanent confidentiality, availability and resilience of information systems;
- Mechanisms that ensure the restoration of information systems and access to personal data in a timely manner in the event of a physical or technical incident;

9. Transfer of Data Outside the European Union

Personal data collected and used by BHHS Atlantic Portugal is not made available to third parties established outside the European Union. If, in the future, this transfer takes place, BHHS Atlantic Portugal undertakes to ensure that the transfer complies with the applicable legal provisions, namely regarding the determination of the suitability of such country with regard to data protection and the requirements applicable to such transfers.

10. Rights of Data Subjects

A. Right to Information

The information contained in this document is provided in writing (including by electronic means) by BHHS Atlantic Portugal to the holder prior to the processing of personal data in question. Under the terms of applicable law, BHHS Atlantic Portugal is under no obligation to provide the holder with this information when and to the extent that the holder is presumed to already have knowledge of it.

The information is provided by BHHS Atlantic Portugal free of charge.

B. Right of Access to Personal Data

BHHS Atlantic Portugal guarantees the means that allow access, by the data subject, to their personal data.

The data subject has the right to obtain from BHHS Atlantic Portugal confirmation that the personal data concerning him/her are or are not processed and, if applicable, the right to access his/her personal data and the following information :

- The purposes of data processing;
- The categories of personal data in question;
- Recipients or categories of recipients to whom personal data have been or will be disclosed, namely recipients established in third countries or belonging to international organizations;
- If possible, the period of storage of personal data;
- The existence of the right to ask BHHS Atlantic Portugal to rectify, erase or limit the processing of personal data, or the right to oppose such treatment;
- Right to file a complaint with the CNPD or other supervisory authority;
- If the data has not been collected from the data subject, the available information on the origin of such data;
- The existence of automated decisions, including the definition of profiles, and information regarding the underlying logic, as well as the importance and expected consequences of such processing for the data subject;
- Right to be informed about the appropriate guarantees associated with the transfer of data to third countries outside the EU or international organisations.

Upon request, BHHS Atlantic Portugal will provide the data subject, free of charge, with a copy of their data that is currently being processed. The provision of other copies requested by the holder may incur administrative costs.

C. Right to Rectification of Personal Data

The data subject has the right to request, at any time, the rectification of his/her personal data, as well as the right to have his/her incomplete personal data completed, including by means of an additional declaration.

In the event of data rectification, BHHS Atlantic Portugal communicates to each recipient to whom the data has been transmitted the respective rectification, unless such communication proves impossible or implies a disproportionate effort for BHHS Atlantic Portugal.

D. Right to Erase Personal Data (“right to be forgotten”)

The data subject has the right to obtain, on the part of BHHS Atlantic Portugal, the erasure of his/her data when one of the following reasons applies:

- The data of the holder is no longer necessary for the purpose that motivated its collection or treatment;
- The holder withdraws the consent on which the processing of data is based and there is no other legal basis for such processing;

- The holder opposes the treatment under the right of opposition and there are no prevailing legitimate interests that justify the treatment;

- If the data of the holder are treated unlawfully;

- If the data of the holder have to be deleted to comply with a legal obligation to which BHHS Atlantic Portugal is subject.

Under the applicable legal terms, BHHS Atlantic Portugal is under no obligation to erase the data of the holder to the extent that the treatment proves necessary to comply with a legal obligation to which BHHS Atlantic Portugal is subject or for the purposes of declaration, exercise or defense of a right of BHHS Atlantic Portugal in a legal proceeding.

In case of deletion of data, BHHS Atlantic Portugal communicates to each recipient/entity to whom the data have been transmitted the respective deletion, unless such communication proves impossible or implies a disproportionate effort for BHHS Atlantic Portugal.

If BHHS Atlantic Portugal has made the data of the holder public and is obliged to erase them under the right to erasure, BHHS Atlantic Portugal undertakes to ensure the measures that are reasonable, including of a technical nature, taking into account taking into account the available technology and the costs of its application, to inform those responsible for the effective processing of the personal data that the data subject has requested to erase the links to such personal data, as well as copies or reproductions thereof.

E. Right to Limit the Processing of Personal Data

The data subject has the right to obtain, from BHHS Atlantic Portugal, the limitation of the processing of his/her data, if one of the following situations applies (the limitation may consist of inserting a trademark in the personal data kept for the purpose of to limit your treatment in the future):

- If you contest the accuracy of the personal data, during a period that allows BHHS Atlantic Portugal to verify its accuracy;

- If the treatment is unlawful and the data subject opposes the erasure of the data, requesting, in return, the limitation of its use;

- If BHHS Atlantic Portugal no longer needs the data of the data subject for processing purposes, but such data is required by the data subject for the purposes of declaring, exercising or defending a right in a legal proceeding;

- If the holder has objected to the treatment, until it is verified that the legitimate reasons of BHHS Atlantic Portugal prevail over those of the holder.

When the data of the holder are subject to limitation, they may only, with the exception of conservation, be processed with the consent of the holder or for the purposes of declaring, exercising or defending a right in a judicial process, to defend the rights of another natural or legal person, or for legally established public interest reasons.

The data subject who has obtained the limitation of the processing of his data in the aforementioned cases will be informed by BHHS Atlantic Portugal before the limitation to the treatment is annulled. In case of limitation of data processing, BHHS Atlantic Portugal will communicate to each recipient to whom the data have been transmitted the respective limitation, unless such communication proves impossible or implies a disproportionate effort for BHHS Atlantic Portugal.

F. Right of Personal Data Portability

The data subject has the right to receive the personal data concerning him/her and which he/she has provided to BHHS Atlantic Portugal, in a structured, commonly used and machine-readable format, and the right to transmit this data to another controller, if:

- The treatment is based on consent or a contract to which the holder is a party;

- The treatment is carried out by automated means.

The portability right does not include inferred data or derived data, i.e. personal data that are generated by BHHS Atlantic Portugal as a consequence or result of the analysis of the data being processed.

The data subject has the right to have personal data transmitted directly between those responsible for the treatment, whenever this is technically possible.

G. Right of Opposition to Treatment

The holder has the right to object at any time, for reasons related to his/her particular situation, to the processing of personal data concerning him/her based on the exercise of legitimate interests pursued by BHHS Atlantic Portugal or when the processing is carried out for purposes other than those for which personal data were collected, including profiling, or when personal data are processed for statistical purposes.

BHHS Atlantic Portugal will cease processing the data of the holder, unless it presents compelling and legitimate reasons for such treatment that prevail over the interests, rights and freedoms of the holder, or for the purposes of declaring, exercising or defending a right of BHHS Atlantic Portugal in a lawsuit. When the data of the data subject are processed for the purposes of direct marketing (marketing), the data subject has the right to object at any time to the processing of data concerning him/her for the purposes of said marketing, which covers profiling insofar as it relates to direct

marketing. If the holder objects to the processing of their data for the purposes of direct marketing, BHHS Atlantic Portugal ceases the processing of data for this purpose.

The data subject also has the right not to be subject to any decision made exclusively on the basis of automated processing, including the definition of profiles, which produces effects in his/her legal sphere or that significantly affects him/her in a similar way, unless the decision:

- It is necessary for the conclusion or performance of a contract between the holder and BHHS Atlantic Portugal;

- It is authorized by legislation to which BHHS Atlantic Portugal is subject; or - It is based on the explicit consent of the data subject.

H. Procedures for the Exercise of Rights by the Holder

The right of access, the right of rectification, the right of erasure, the right of limitation, the right of portability and the right of opposition can be exercised by the data subject by electronic contact to hello@bhhsatlanticportugal.com, through the address Estrada da Circunvalação, Quinta do Paizinho, n.o 2-B, Armazém 4, 2790-194, Carnaxide.

BHHS Atlantic Portugal will respond in writing (including by electronic means) to the holder's request within a maximum period of one month from the receipt of the request, except in cases of special complexity, in which this period can be extended up to two months.

If the requests submitted by the holder are manifestly unfounded or excessive, namely due to their repetitive nature, BHHS Atlantic Portugal reserves the right to charge administrative costs or refuse to follow up on the request.

I. Personal Data Violations

In the event of a data breach and to the extent that such breach is likely to entail a high risk for the rights and freedoms of the data subject, BHHS Atlantic Portugal undertakes to communicate the breach of personal data to the data subject in question, without undue delay.

Under legal terms, communication to the holder is not required in the following cases:

- If BHHS Atlantic Portugal has applied adequate protection measures, both technical and organizational, and these measures have been applied to personal data affected by the breach of personal data, especially measures that make personal data incomprehensible to any unauthorized person to access such data, such as encryption;

- If BHHS Atlantic Portugal has taken subsequent measures to ensure that the high risk to the rights and freedoms of the holder is no longer likely to materialise; or

- If the communication to the holder implies a disproportionate effort for BHHS Atlantic Portugal. In this case, BHHS Atlantic Portugal will make a public communication or take a similar measure through which the holder will be informed.

II. Website Usage Policy

This website provides users with access to information, services and content, the user assuming responsibility for their correct use as well as for the registration process that is necessary to access certain services or content.

The user undertakes to properly use the information, contents and services of this website and, in particular, not to carry out any action that may cause physical or logical damage to the system, as well as not to access it fraudulently, by using unauthorized access data.

The content of this website cannot be modified or reinterpreted in order to be protected under another copyright, patent, trademark or intellectual property registration that does not belong to BHHS Atlantic Portugal.

The information provided on the website may contain some technical inaccuracy or typographical error. Consequently, BHHS Atlantic Portugal assumes no responsibility, in any way, for any direct, indirect, incidental or collateral damage resulting from the visit to its pages, namely loss of data, loss of revenue or other income, and interruption of business processes, derived from the use or impossibility of using the information on this site. BHHS Atlantic Portugal also declines any responsibility for the contents of third-party websites that contain links to this website and/or that can be accessed from this website.

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III. Cookies Policy

A "cookie" consists of a file that is imported to your computer or another device when you access certain web pages that collect information about your browsing on said web pages. In some cases, cookies are necessary to facilitate navigation and allow you to store and retrieve information about the browsing habits of a user or his/her equipment, among others, and depending on the information they contain and the way in which they use the your equipment, can be used to recognize the user.

The cookies used on this website can be classified as follows:

- Own cookies: are those that are sent to the user's terminal equipment from a device or domain managed by the editor itself and from which the service requested by the user is provided.
- Third-party cookies: are those that are sent to the user's terminal equipment from a device or domain that is not managed by the editor, but by another entity that processes the data collected through cookies.
- Session cookies: collect and store data when the user accesses a web page.
- Technical cookies: they allow the user to navigate through a web page, platform or application and to use the different options or services that exist therein.

- Personalization cookies: they allow the user to access the service with some pre-defined general characteristics based on a series of criteria in the user's terminal, such as the language, the type of browser through which the user accesses to the service, the regional configuration of the location from which you access the service, etc.
- Analysis cookies: they allow the person responsible for them to monitor and analyze the behavior of users of the websites to which they are linked. The information collected through this type of cookies is used to measure the activity of the websites, application or platform and in the preparation of browsing profiles of the users of said sites, applications and platforms, with the aim of introducing improvements in the function of analysis of the usage data of the users of the service.

To find out which cookies are stored by your browser, you can use the tools available in your browser. We use social media buttons to allow our users to share web pages or select them as favourites. These are buttons for external social networking websites. These sites may record information regarding your Internet activities, including our website. You can review the conditions of use and privacy policies of these websites to find out exactly how they use the information and to find out how you can delete or delete said information.

We sometimes use external web services to display content within our web pages. For example, to show virtual tours, images, videos, graphics, infographics, maps or to carry out surveys. As with buttons for social networks, we cannot prevent these websites or external domains from collecting information about the use made of these embedded content.

BHHS Atlantic Portugal assumes no responsibility for legal or technical problems caused by the user's failure to comply with the indicated recommendations. This communication is intended for knowledge and use by users and, therefore, must not be used for any other purpose. BHHS Atlantic Portugal is also not responsible for the content and veracity of the privacy policies of third parties included in this cookie policy.

In case of doubt regarding this cookie policy, contact us at hello@bhhsatlanticportugal.com

IV. Final part

1. Changes to the Privacy Policy

BHHS Atlantic Portugal reserves the right to change this Privacy Policy at any time. If the change is substantial, a notice will be posted on the website.

2. Applicable law and jurisdiction

The Privacy Policy, as well as the collection, processing or transmission of Data from the holder, are governed by the provisions of Regulation (EU) 2016/679, of the European Parliament and of the Council, of April 27, 2016 and by the applicable legislation and regulations. in Portugal.

Any disputes arising from the validity, interpretation or execution of the Privacy Policy, or that are related to the collection, processing or transmission of Data from the holder, must be submitted exclusively to the jurisdiction of the judicial courts of the district of Lisbon, without prejudice to the legal rules. applicable imperatives.