

Caritas Diocesana de Coimbra is aware that the use of personal data of individual persons requires the trust of the user, believing in the need to protect privacy and ensure the security of personal information placed at their availability.

Its main objective is to ensure the protection, confidentiality and integrity of the personal data that are subject to treatment, respecting the object and purposes for which it is assigned, in accordance with the legal regulation for the protection of personal data in force, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, hereinafter referred to as GDPR.

In view of the foregoing, it is hereby approved and given the Data Protection and Privacy Policy of Caritas Diocesana de Coimbra.

# I. Identification of the Data Protection Officer

Caritas Diocesana de Coimbra (hereinafter referred to as CDC), Private Social Solidarity Institution, headquartered at Rua D. Francisco de Almeida no. 14, 3030-382 Coimbra, VAT number 501 082 174, in pursuit of its activities collects personal data and is responsible for its processing.

It is aware and complies with the legal regulation in force that regulates the processing of personal data, whether collected by automated means or not, being responsible for its collection, organization, conservation and erasure.

## II. Consent of the Owner of Personal Data

CDC requires, as and when required and/or legally required, the holder of personal data, their express, free, specific, informed, explicit and unambiguous consent to collect and process their data.

Consent should cover all treatment activities carried out with the same purpose/object for which it is intended.

The holder of the personal data has the right to withdraw his consent at any time, and the withdrawal of consent does not compromise the lawfulness of the treatment made based on the consent previously given.

#### Consent of minors

The consent of minors under the age of 16 years is considered lawful only if it has been provided by their legal representatives, preferably using secure means of authentication, such as the Citizen's Card or the Digital Mobile Key.

# III. Purposes of the Personal Data treatment

The purpose of personal data processing of is always determined in accordance with the prior consent of the data subject and/or a specific legal basis, namely:

- Continuing the objectives and statutory purposes of CDC;
- Compliance with current legislation and all other legal requirements;



- Legal duties of preservation and integrity of documentation;
- Conduct of pre-contractual procedures;
- Preparation of applications and projects;
- Compliance with contracts to which CDC is a party;
- Fulfilment of projects to which CDC is a beneficiary;
- Reporting and auditing of projects and activities subject to funding by public resources;
- Control and registration of use of facilities and equipment;
- Safety and integrity of facilities and equipment.

# IV. Personal Data Treatment

The processing of personal data, by automated or non-automated means, consists of the operation or set of operations performed, to which the personal data are subject, such as:

- Collection:
- Registration and conservation;
- Organization;
- Adaptation or change;
- Consultation and use;
- Disclosure, regardless of how it is made available;
- Comparison or interconnection:
- Limitation;
- Delete or destroy.

# V. Rights of the Owner of Personal Data

The holder of the personal data has the right to be aware of the risks, rules, guarantees and rights associated with the treatment of his data, as well as the means he has at any time to request, namely:

- The purpose and limitation of the processing of personal data collected;
- Easy access to personal data transferred and verification of the lawfulness of their treatment;
- Correction or correction thereof;
- The respective erasure (without prejudice to the provisions of VI on the period of retention of the data);
- Opposing your treatment;
- The portability for an entity indicated by him, although it is of personal data stored in electronic support;



• The presentation of a complaint to the control entity.

In all cases, if there is a legally imposed norm or obligation that overrides these rights, CDC reserves the right not to execute what was required (or subject to restrictions or limitations), always giving reasons in all cases for the reason with the holder concerned.

## VI. Conservation Time Data

CDC guarantees the preservation of personal data for the period strictly necessary to fulfil the purpose of its specific treatment, as well as its deletion/destruction (or anonymization, if and when applicable / necessary) immediately after that period, at the request of the respective owner, or, once the legal deadlines have been met.

# <u>VII. Transmission of Personal Data to Third Parties and Intervention of Subcontractors</u>

Transmission to third parties

In the course of it activity, CDC may have to transmit personal data in its possession to third parties, in order to comply with legal, regulatory, pre-contractual or contractual obligations, which will always do so within the limits of the legally determined and as long as it is indispensable to the pursuit of its activities.

In particular and for the purposes of the present, third parties are considered to be public authorities responsible for controlling and auditing assignments, activity partners, projects or services.

To this end, CDC will require, whenever it is legally required, safeguarding the regime of exceptions provided in the GDPR, the competent and prior consent to the holders of personal data subject to this type of treatment.

Intervention of subcontractors

In the course of it activity, CDC may subcontract third parties to process personal data on its behalf. If and when this occurs, CDC will require the competent and prior consent to the holders of personal data subject to this type of treatment, respecting all the requirements set forth in the GDPR.

### VIII. Data Protection Commitment

CDC will ensure the implementation of all formal and operational procedures for the protection of the personal data being processed, as well as for the current and updated registration of all the resulting activities.

Further, it undertakes to carry out in advance the competent prior study of the actions necessary for the processing of personal data, in accordance with the current RGPD and any changes that it may suffer.

CDC will also make every effort to ensure and maintain all the technical means at its disposal in order to prevent loss, misuse, alteration, unauthorized access and misappropriation of personal data the fallibility of Internet security measures.

CDC declines all responsibility for damages suffered by users and caused or not by third parties through illegitimate access to data transmitted by those users through its Internet portal and / or its IT infrastructure.



CDC undertakes to notify the responsible body in accordance with the terms and deadlines set forth in article 33 of the RGPD, if it is aware of any violation of personal data that causes accidental or unlawful destruction, loss, alteration, disclosure or access, to personal data transmitted, stored or otherwise treated.

# IX. Safety

CDC has a continuous and up-to-date registration process of the personal data processing activities that it performs.

More ensures that all requests that are made on the website <a href="https://www.caritascoimbra.pt">https://www.caritascoimbra.pt</a> are safe, since it uses strict security measures for this purpose, namely, the use of the efficient Socket Layer Server (SSL). With this server, any information that is entered is encrypted before being transmitted, making it very unlikely that any third party will access the transmitted information.

Also, in order to create a maximum level of security, you can safely navigate by checking the existence of an icon (image) of a closed padlock in the address bar.

The address entered must also begin with https, and the "s" indicates that you are browsing a secure page.

### X. Links to external websites

This Privacy and Data Protection Policy applies exclusively to CDC website.

In this sense, considering that this website may contain links to websites of partners, suppliers and others, and that the link to these websites always presupposes a click of the user on its link, it is never an automatic link, it becomes absolutely impossible for CDC ensure that partners 'and suppliers' practices regarding data protection are in accordance with the law, complying with the ethical assumptions they are required to make.

In view of the foregoing, CDC cannot be held responsible for the content or privacy policy of external websites, and it is solely the responsibility of its owners any harm or illicit that the consultation of such sites may cause.

### XI. Contacts

The holder of the personal data may exercise their rights to withdraw consent, rectification, modification or erasure of the personal data provided or request any information regarding their treatment by written request addressed to CDC to the address indicated in Clause I or to the electronic address dpo@caritascoimbra.pt.

### XII. Final dispositions

CDC may, at any time and without prior notice, amend this Data Protection and Privacy Policy, namely due to the need to adapt it to any legislative changes or to recommendations of the National Data Protection Commission.

Should such changes occur, the CDC will make available in an area accessible to all its users the changes made.

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