

Personal Data Treatment Policy

This data-processing policy is in accordance with 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 to the free movement of such data, hereinafter referred to as **Personal Data Treatment Policy**.

The purpose of this policy is to inform the data owners, who visit our website, digital applications, products and services (hereinafter collectively referred to as "Platforms"), and provide us with personal information about the management of your personal data.

CapTemp, Lda., in the scope of providing your services, need to collect some personal data from their customers.

On the other hand, the increasingly frequent interaction with users of our website, applications, products and digital services also requires, in some cases, the collection of personal information of the user in order to enjoy services provided by CapTemp Lda. collection of data from your device (through files designated by cookies) to improve the performance of these Platforms.

In this sense, this Personal Data Protection Policy aims to help our customers and users of CapTemp Lda. Platforms (hereinafter collectively referred to as "User (s)") to understand what personal data we collect, how and why we use them , to whom we disclose them and how we protect your privacy when using our services or visiting our Platforms.

1. USE OF «PERSONAL DATA»

1.1. We want our users to know the general privacy rules and the terms of the personal data we collect, in strict compliance with and compliance with the

applicable legislation in this area, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 ("General Regulation on Data Protection").

1.2. Personal data means any information of any nature and regardless of its support, including sound and image, relating to an identified or identifiable natural person (data subject). An identifiable person is one who can be directly or indirectly identified, namely by reference to an identification number or to more specific elements.

1.3. CapTemp Lda. seeks to respect best practices regarding security and protection of personal data, promoting actions and improving systems in order to protect the data that is made available to us by our Users.

1.4. The use and navigation in our Platforms, the completion of our forms and the provision of data directly or indirectly imply knowledge and acceptance of the conditions of this Policy, as well as any other specific terms, policies and conditions relating to the subscribed services. By subscribing to our services, please read the respective terms and conditions carefully. By making your personal data available, you are authorizing the collection, treatment, use and disclosure of the data in accordance with the rules defined herein.

2. WHO IS RESPONSIBLE FOR THE TREATMENT OF YOUR DATA

2.1. This Privacy Policy is intended to inform our Users of the terms of the processing of personal data carried out by CapTemp Lda. In the context in which it determines the purposes and means of data processing, and for this purpose it is considered the entity responsible for the treatment, in accordance with the General Regulation on Data Protection.

3. CATEGORIES OF PERSONAL DATA WE TREAT AND RESPECT FOR TREATMENT PURPOSES

3.1. CapTemp Lda. Collects and processes the personal data necessary for the provision of its services and / or subscription of features, products and services, namely when using our Platforms or, in any way, contacting us.

3.2. The use of personal data is simply for the purposes mentioned above and for sending informative and promotional newsletters.

3.3. In this sense, your personal data may include, in particular, your name, your identification and contact information or information about how you use our Platforms or how you interact with us.

4. SPECIAL CATEGORIES OF PERSONAL DATA

4.1. CapTemp Lda. Does not collect or process the personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data to identify a person unambiguously, health-related data or data relating to a person's sexual life or sexual orientation”.

5. COMMUNICATION OF YOUR DATA TO THIRD PARTIES

5.1. The personal data of the User will not be assigned to third parties, much less commercialized.

5.2. CapTemp Lda. May use other entities to provide certain services. Eventually this provision of services may imply access by these entities to the personal data of their Users.

5.3. Thus, any subcontracting entity of CapTemp. will treat the personal data of our Users, in the name and on behalf of CapTemp Lda., under the strict obligation to follow our instructions. CapTemp Lda. Shall ensure that such subcontracting entities provide sufficient guarantees for the execution of appropriate technical and organizational measures so that the processing complies with the requirements of applicable law and ensures the security and protection of the rights of data subjects under the terms of the subcontracting agreement concluded with those subcontracting entities.

5.4. CapTemp Lda. may also transmit personal data of its Users to third parties, when it deems such communications as necessary or appropriate (i) in light of applicable law, (ii) in compliance with legal obligations / court orders, or) to respond to requests from public or governmental authorities.

5.5. The data may be provided to the judicial or administrative authorities, provided that in compliance with legal obligation by CapTemp Lda.

5.6. In any of the above situations, CapTemp Lda. undertakes to take all reasonable steps to ensure the effective protection of the personal data it treats.

6. CONSERVATION OF PERSONAL DATA

6.1. All Personal Data are treated by CapTemp Lda. In the strict compliance with the applicable legislation.

6.2. The length of time during which the data is stored and stored varies according to the purpose for which the information is used. There are, however, legal requirements that require you to keep the data for a certain period of time. Thus, and where there is no specific legal requirement, the data will be stored and retained only for the period necessary for the purposes for which they were collected, as best identified above.

7. RIGHTS OF DATA HOLDERS

7.1. In accordance with the applicable legislation, the data subject may request, at any time, access to personal data concerning him, as well as its rectification, elimination or limitation of its treatment, the portability of his data, or oppose (except for data strictly necessary for the provision of the service), through the following contacts:

Email: geral@captemp.com

Address: Rua Dr. José António Varela Pinto, Armazém 1A, Zona Industrial da Formiga

7.2. You can obtain confirmation that personal data concerning you are processed and access to them, and you are provided, if you require, a copy of the data processed by CapTemp Lda.

7.3. In accordance with the law, you are also guaranteed the right to withdraw your consent for the processing of the data, whose consent constitutes the basis of legitimacy of the respective treatment. To this end, you have the right to withdraw

your consent at any time, which does not, however, invalidate the treatment made up to that date on the basis of prior informed consent.

7.4. The User may also, at any time, request the deletion of his personal data, under the terms legally provided for.

7.5. You also have the right, in accordance with the applicable legislation, to request the limitation of the processing or portability of your data, subject to the conditions legally established. To this end, you must submit a request to the above contacts.

7.6. Without prejudice to any other administrative or judicial remedy, the data subject is entitled to lodge a complaint with the CNPD or other competent control authority in accordance with the law if he considers that his data are not being subject to legitimate treatment by CapTemp Lda., pursuant to the applicable legislation and this Policy.

8. USERS OF CapTemp Lda PLATFORMS.

8.1. This Personal Data Protection Policy applies fully to all users of CapTemp Platforms. However, due to the specificity inherent in the use of the aforementioned digital platforms (namely CapTemp's websites and applications), certain issues must be regulated particularly relevant within this.

8.2. CapTemp Lda. is aware that sending personal information is a major concern for users who use the Internet. Thus, in all our websites and applications, the personal data collection forms require encrypted sessions of the browser, and all the personal data that is available to us is stored securely in the CapTemp Lda systems, on which the best technical and procedural security practices for the protection of your personal data.

8.3. Notwithstanding the security measures adopted by CapTemp Lda., We alert all our Users that when accessing the Internet they must take precautions regularly and adopt additional security measures in this area, namely through the use of an updated computer and browser, and caution the use of shared computers, as well as access to your personal User accounts, not sharing your access data with third parties.

8.4. Through our Platforms, we provide links to third party websites, which are subject to independent Data Protection Policies. Please note that this Policy does not apply to such websites and CapTemp Lda. is not responsible for the collection of your information by those third parties through their websites.

9. COOKIES AND OTHER TRACKING TECHNOLOGIES

9.1. The visit to our websites implies the accommodation of cookies in your equipment (computer, tablet or mobile phone) in order to improve the way of navigation and operation.

9.2. We do not allow cookies from foreign companies in any way without our consent.

10. SAFETY MEASURES ADOPTED BY CapTemp Lda.

10.1. CapTemp Lda. is committed to ensuring the confidentiality, protection and security of its users' personal data by implementing appropriate technical and organizational measures to protect its data against any form of undue or unlawful treatment and against any accidental loss or destruction of these data. To this end, we have systems in place to guarantee the security of personal data processed, creating and updating procedures to prevent unauthorized access, accidental loss and / or destruction of personal data, and to comply with the legislation on the protection of personal data and to treat such data only for the purposes for which it was collected, as well as to ensure that such data is treated with adequate levels of security and confidentiality.

10.2. Because we recognize the sensitivity of this information, we include practices and standards in the area of personal data protection, in order to ensure the knowledge of our employees about the obligations imposed on them in this area.

10.3. In this context, CapTemp Lda. is responsible for the processing of personal data in order to monitor compliance with applicable policies and standards on the protection of personal data.

10.4. As described in this Personal Data Protection Policy [Data Communication to Third Parties section], we may in some cases transmit your personal data to third parties. CapTemp Lda has established clear rules for contracting the processing of personal data with its subcontractors and requires them to take appropriate technical and organizational measures to protect their personal data. However, in some cases we may be required by law to disclose your personal data to third parties (such as public authorities) for which we have limited control over the protection of personal data.

11. INTERNATIONAL DATA TRANSFERS

11.1. The provision of services by CapTemp Lda. does not imply the transfer of your personal data to third countries (other than those belonging to the European Union or the European Economic Area).

12. CONTACT US

12.1. You may contact CapTemp Lda for more information on the processing of your personal data, as well as any questions related to the exercise of the rights attributed to you by the applicable legislation, and especially those referred to in this Policy, through the following contacts:

Email: geral@captemp.com

Address: Rua Dr. José António Varela Pinto, Armazém 1A, Zona Industrial da Formiga, 3100-513 Pombal

13. CHANGES TO PERSONAL DATA TREATMENT POLICY

13.1. CapTemp Lda. Reserves the right at any time to make modifications or updates to this Policy, and these changes are duly updated in our Platforms. We suggest that you check them regularly to be aware of any changes.

CapTemp Lda. Personal Data Treatment Policy was reviewed and published in July 2018