#### **TERMS AND CONDITIONS**

# **Waiver of Liability**

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This information may not always be up to date or complete as there are contents which are provided by third entities. Therefore, **A-to-Be®** and Brisa Inovação e Tecnologia, S.A. cannot be held liable for any information which is out of date or incomplete.

# Copyright

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This information cannot be used for profitable or offensive purposes, or changed or manipulated without expressly referring such fact.

# Privacy Policy of a-to-be.com

This Website collects some Personal Data from its Users.

# Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies, Usage Data and email address.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection. The Personal Data may be freely provided by the User, or collected automatically when using this Website. Any use of Cookies - or of other tracking tools - by this Website or by the owners of third party services used by this Website, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User. Failure to provide certain Personal Data may make it impossible for this Website to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

# Mode and place of processing the Data

# Methods of processing

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

#### Place

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

#### Retention time

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

#### The use of the collected Data

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics and Contacting the User.

The Personal Data used for each purpose is outlined in the specific sections of this document.

# Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

#### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

# Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing:  $US - \underline{Privacy Policy} - \underline{Opt Out}$ 

# Google Tag Manager (Google Inc.)

Google Tag Manager is an analytics service provided by Google Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: US - Privacy Policy

# Contacting the User

#### Contact form (This Website)

By filling in the contact form with their Data, the User authorizes this Website to use these details to reply to requests for information, guotes or any other kind of request as indicated by the form's header.

Personal Data collected: email address.

# Additional information about Data collection and processing

#### Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Website or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

#### System logs and maintenance

For operation and maintenance purposes, this Website and any third party services may collect files that record interaction with this Website (System logs) or use for this purpose other Personal Data (such as IP Address).

#### Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

#### The rights of Users

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Website does not support "Do Not Track" requests. To determine whether any of the third party services it uses honor the "Do Not Track" requests, please read their privacy policies.

#### Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Website and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

# Information about this privacy policy

The Data Controller is responsible for this privacy policy.