



## Privacy Notice – Last updated February 25, 2021

Thank you for choosing to be part of the EASE – Entrepreneurs for Autonomy, Self-development and Equality – community. We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [contact.ease@ease.aproximar.com](mailto:contact.ease@ease.aproximar.com).

When you visit our website <https://ease.aproximar.pt/> (the “Website”), and more generally, use any of our services (the “Services”, which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, marketing or events.

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## 1. WHAT INFORMATION DO WE COLLECT?

In short: We collect personal information that you provide us.

We collect personal information that you voluntarily provide to us when you register on the Website, express an interest in obtaining information about us or our Services, when you participate in activities on the Website (such as posting messages in our online forums) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website, the choices you make and the features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We collect names; phone numbers; email addresses; mailing addresses; job title; birth dates; educational level; passwords; usernames; and other similar information.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information collected from other sources.**

In short: We may collect data from partners and other outside sources.

In order to enhance our ability to provide relevant services to you and update our records, we may obtain information about you from other sources, such as our partners or other affiliate programs. This information includes mailing addresses, job titles, email addresses, phone numbers, and other similar information.

## 2. HOW DO WE USE YOUR INFORMATION?

In short: We process your information for purposes based on legitimate project interests, the fulfillment of our agreement to you, compliance with our legal obligations, and your consent.

We use personal information collected via our Website for the accomplishment of EASE project purposes described below. We process your personal information for these purposes in reliance on our legitimate project interests, in order to enter or perform into a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process;**
- **To post testimonials** – we post testimonials on our website that may contain private information. Prior to posting a testimonial, we will obtain your consent to use your name and the content of the testimonial. If you wish to update or delete your testimonial, please



contact us at [contact.ease@ease.aproximar.com](mailto:contact.ease@ease.aproximar.com) and be sure to include your name, testimonial location, and contact information;

- **Request feedback** – we may use your information to request feedback and to contact you about your participation in the EASE project;
- **To enable user-to-user communications** – we may use your information to enable user-to-user communications with each user’s consent;
- **To manage user accounts** – we may use your personal information for the purposes of managing our account and keeping it in working order;
- **To send administrative information to you** – we may use your personal information to send you project and feature information and/or information about changes to our terms, conditions, and policies;
- **To protect our Services** – we may use your personal information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention);
- **To enforce our terms, conditions, and policies for project purposes, to comply with legal and regulatory requirements or in connection with our contract;**
- **To respond to legal requests and prevent harm** – if we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond;
- **Administer your online activities** – we may use your personal information to administer your activities on the Website;
- **To deliver and facilitate delivery of services to the user** – we may use your personal information to provide you with the requested service;
- **To provide support to users** – we may use your personal information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

### 3. DATA PROTECTION

Personal data collected through the EASE website are processed in accordance with the provisions of the Privacy Policy, with the General Data Protection Regulation (EU 2016/679 do P.E. - RGPD) and with the Law n° 58/2019, 8<sup>th</sup> August.

### 4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

In short: We only share information with your consent, to comply with laws, to provide with services, to protect your rights, or to fulfill business obligations.

We may process or share your data that we hold based on the following legal basis:

- **Consent:** we may process your data if you have given us specific consent to use your personal information for a specific purpose;
- **Legitimate interests:** we may process your data when it is reasonably necessary to achieve our legitimate business interest;



- **Performance of a Contract:** where we have entered in a contract with you, we may process your personal information to fulfill the terms of our contract;
- **Legal Obligations:** we may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process;
- **Vital Interests:** we may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Trainers:** we may share your information with our trainers, in which case we will require those trainers to honor this privacy notice;
- **Project Partners:** we may share your information with our project partners to enhance your experience in the project.

## 5. HOW LONG DO WE KEEP YOUR INFORMATION?

In short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law. No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to



protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

## 7. DO WE COLLECT INFORMATION FROM MINORS?

In short: We do not knowingly collect data from or market to children under 18 years old.

We do not knowingly solicit data from or market to children under 18 years old of age. By using the Website, you represent that you are at least 18. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data, we may have collected from children under age 18, please contact us at [contact.ease@ease.aproximar.com](mailto:contact.ease@ease.aproximar.com).

## 8. WHAT ARE YOUR PRIVACY RIGHTS?

In short: In the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In the European Economic Area, you have the right (I) to request access and obtain a copy of your personal information, (II) to request rectification or erasure, (III) to restrict the processing of your personal information, (IV) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note, however, that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You can find the European Commission data protection Authorities [here](#).

If you have any questions or comments about your privacy rights, you may email us at [contact.ease@ease.aproximar.com](mailto:contact.ease@ease.aproximar.com).

### **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account;
- Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to



prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove or reject cookies, this could affect certain features or services of our Website. To opt-out of interest-based advertising by advertisers on our Website visit:

<https://optout.aboutads.info/?c=2&lang=EN>

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example, to send you service-related emails that are necessary for your participation in the project.

## 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 10. DO WE MAKE UPDATES TO THIS NOTICE?

In short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 11. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have any questions or comments about this notice, you may email us at [contact.ease@ease.aproximar.com](mailto:contact.ease@ease.aproximar.com) or post to:

Aproximar Cooperativa de Solidariedade Social, CRL

Rua do Paraíso, loja 2, Alfragide

Amadora, Lisboa 2610-136



Portugal

## 12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLELCT FROM YOU?

Based on applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete in come circumstances. To request to review, update, or delete your personal information, please submit a request by contacting us at [contact.ease@ease.aproximar.com](mailto:contact.ease@ease.aproximar.com). We will respond to your request as soon as possible.