

## Privacy Notice

Noesis undertakes to respect the privacy of its users.

The user, when sending his/her information declares and guarantees that he/she has the capacity and the powers to communicate them to Noesis. Due to the open nature of the internet Noesis advises the user not to submit confidential information online.

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## 1. Name and contact of the Controller

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The data controller is NOESIS PORTUGAL – CONSULTADORIA EM SISTEMAS INFORMATICOS, S.A., a limited liability company with registered offices at Centro Empresarial Torres de Lisboa, Rua Tomás da Fonseca, Torre E,– 14º Piso, 1600-209 Lisbon, Portugal, Taxpayer’s number: 505128985.  
Telephone: 00 351 214 235430  
email: [privacidade@noesis.pt](mailto:privacidade@noesis.pt).

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## 2. What data we collect and what do we do with your data

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### a. Direct collection

As a visitor of the site it is not necessary to provide any personal data. The users personal data is only collected when some of the available functionalities are subscribed and are necessary for Noesis to give the required information or clarification requested or to allow user to access webinars, Events, Papers, Newsletters, Articles, Campaigns, etc. Further Noesis may contact the user for purposes of presentation of its Commercial Offer, sending of proposals and scheduling of meetings.

The data that we collect for those purposes are the following:

- Name\*
- Telephone\*
- Email\*
- Company’s name

Information marked with an \* is necessary in the event you wish to receive personalized information about our services or in those cases where you want to watch webinars or make downloads of information about our Commercial Offer, visualize Papers, receive Newsletters or Noesis Magazine, participate in campaigns and events and also receive our proposals for provision of services and contacts prior or subsequent to such proposals.

The communication of your personal data does not constitute a legal, a contractual obligation nor a requirement necessary for the entering into a contract except in those cases where your application that you have sent us has been selected by Noesis to execute a labour or trainee contract.

In the latter cases the providing of personal data is obligatory: name, address, identification numbers and respective validity, social security number, taxpayer's number, marital status and number of people in the household that are dependent on the data subject. If data subject fails to provide this data Noesis cannot proceed with the execution of the labour agreement or trainee contract.

**b. Indirect collection of data:**

Noesis, through Google Analytics, also collects the following aggregated data: Geographic origin (city country), language, type of device, operating system, browser, Internet Service Provider, age, gender, data and time of access and address of the referral data, IP address.

Noesis will monitor all statistical information regarding the use of the site in an anonymised and aggregated way. Data used for this purpose does not contain personal data nor private information.

The analysis made from the aggregated statistical information will be used to interpret the trends of use of the Site and to improve in a continuous way the service levels and the user satisfaction. This aggregated statistical information may be communicated to third parties or disclosed publicly.

Noesis uses cookies in the site to improve the performance and of the user experience.

Cookies are small text files that are stored on your computer or on your mobile device through your browser, retaining only generic information related to User preferences, allowing access to specific areas of the site and faster and more efficient navigation, eliminating the need to repeatedly enter the same information.

Users of the site by clicking on the cookies banner on the Noesis website are accepting the introduction of cookies on their computers or devices in the terms indicated above, without prejudice to the control and management available.

All browsers allow the user to accept, reject or delete cookies, in particular by selecting the appropriate settings in their browser. At any time the user can, through the browser, decide to be notified about the receipt of cookies, as well as block their entry into their system. Removing or blocking cookies on the site may limit access to certain areas of the site. To know our cookie policy [click here](#).

Noesis may also use web beacons (including conversion pixels) or other technologies for purposes similar to those identified above, including them on your site, in marketing emails, or in our Newsletters to determine whether messages have been opened and whether clicks have been made on links made available. Web beacons do not put information on users' computers but may, in conjunction with cookies, allow monitoring of site activity. Conversion pixels are small codes located on a web page that are activated when someone visits that page.

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### 3. What do we do with your data (purposes and legal grounds):

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In cases where the user has sent us his/her curriculum vitae, we will consider the user in recruitment processes, and the data will be sent to Human Resources for analysis, treatment and eventual selection.

Noesis collects your contact information so that we can provide the information or clarification requested or to enable you to access webinars, Papers, Newsletters, Articles, etc., as defined in point a. Direct collection.

Noesis may also, if the data subject so authorizes, use the contact data provided for use in marketing campaigns or to send communications relating to our Offer of services or our Partners. In these cases, the user is always given the possibility to oppose the sending of subsequent communications for the purposes of direct marketing, selecting the corresponding field or sending an email to [marketing@noesis.pt](mailto:marketing@noesis.pt).

#### **Legal Grounds:**

- Forms: Submission of requested information and availability of webinars, case studies, articles and newsletters, etc. – legal Grounds: User Consent
- Contact via email: Response to the information requested by the user. Legal Grounds: User Consent
- Spontaneous application / response to job posting: Selection and recruitment. Legal Grounds: User Consent in cases of spontaneous candidacy; in cases where a contract of employment or probation is concluded; the ground is the performance of the contract.
- Google Analytics: Site Optimization: Legal Grounds: Noesis's Legitimate Interests in controlling the performance of the site

- web beacons and conversion pixel, Facebook and LinkedIn: measure communication effectiveness in social networks Legal Grounds: Noesis's legitimate interests.

In those cases where Noesis relies on legitimate consent as legal basis for processing of user personal data, the data subject may request from Noesis the balancing test performed over the processing of the data to assess whether Noesis legitimate interest prevail over those interests, rights and freedoms of the Data Subject.

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#### **4. Data Recipients**

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Human Resources of Noesis are the recipients in cases of submission of applications and curricula vitae.

In the cases of contacts for the purpose of sending Proposals, the Department of Professional Services and Commercial Department are the recipients.

In the other cases, the Marketing or Legal Department (in the case of exercise of the rights by the Holders) are addressed.

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#### **5. How long and where do we store your data?**

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Noesis Portugal will conserve and maintain the data up to: user's instructions to the contrary; that its maintenance is no longer permitted by law; at the date on which Noesis no longer has a valid basis for the processing of its data, whichever occurs first.

We store your data in Portugal.

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#### **6. Disclosure of the data**

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Noesis does not disclose personal data collected except as required by law or by the competent authorities.

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#### **7. Transfers to countries outside the European Union**

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There are no transfers to countries outside the European Union.

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## 8. What measures have we implemented to protect your data against unauthorized access, alteration or destruction?

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Noesis takes the necessary and legally required measures to ensure the protection of the information collected from its users through the Noesis website. These measures guarantee the offline security of this information.

Among others, the following technical and organizational measures are implemented to guarantee the security and confidentiality of personal data: physical security (through access control), logical separation of registers, access passwords and access levels, firewalls and antivirus programs. The data is kept encrypted.

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## 9. Your rights

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All personal data are processed in accordance with the provisions of Regulation 2016/679 of the European Parliament and of the Council, with the holders of personal data having the following rights and may exercise it, personally in our premises or in writing, by email [privacidade@noesis.pt](mailto:privacidade@noesis.pt), at any time and without any charge:

**Right of access:** means data subject has the right to know if Noesis has personal data pertaining to him/her and if so, to have access to such data.

**Rectification right:** means the right to have his/her data rectified if inaccurate or have the data completed, if incomplete.

**Right to Erasure:** means the right to have his/her data erased if they are no longer necessary in relation to the purposes for which they were collected; if Data subject withdraws his/her consent; if data subject objects to the processing based on legitimate grounds and there are no overriding legitimate interest for the processing, if the personal data have been unlawfully processed.

**Right to restriction of processing:** in this case Noesis may only store the data. It applies when the accuracy of the data is contested by data subject, when the processing is unlawful but the data subject opposes to its erasure; when the controller no longer needs

the data but they are required by the data subject for purposes of the establishment, exercise or defense of legal claims.

Right to data portability: means that data subject has the right to receive from Noesis the personal data in a structured, commonly used and machine readable format in those cases where the legal grounds for processing was the consent or execution of a contract and the processing is carried out by automated means.

Right to object:

In the event Noesis processes your data for direct marketing purposes you may oppose at any time and your data shall no longer be processes for such purposes. In the remainder of situations, which means when the data is processed based on Noesis legitimate interests, the data subject may object at any time on grounds relating to his or her particular situation. Likewise the data subject may oppose if Noesis used the data for purposes that are not those that were communicated at the time of collection.

In those cases where consent was the legal basis for processing of data subject's personal data, the data subject has the right to withdraw his / her consent at any time and without detriment, and for that purpose he / she must contact us by email [privacidade@noesis.pt](mailto:privacidade@noesis.pt) .

The data subject has the right to submit a complaint to the Supervisory Authority. The Data Owner may at any time exercise his rights of access, erasure, rectification and limitation of the processing of his personal data without any detriment.

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## 10. Contact us

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For any question related to the processing of your personal data you can contact Noesis for the phone number 00 351 214 235 430 or send us an email to [privacidade@noesis.pt](mailto:privacidade@noesis.pt) .

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## 11. Revisions and Amendments

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The date of creation of this Policy is April 19, 2018 and it has been revised on 27 April 2018.

Noesis Portugal reserves the right to change the privacy policy at any time. For registered users, Noesis will send emails with the new version of this Policy in those cases of relevant changes or amendments.