
PRIVACY POLICY

The protection of the privacy and personal data of all persons who in any way relate to GAREN – Avaliações de Ativos (Asset valuations) (clients, employees, partners, subcontractors, and others) is a fundamental commitment of our company.

Personal data is essential for the management of human resources and for the fulfillment of legal obligations, and the challenges associated with it are very strongly influenced by technological, economic, and social developments.

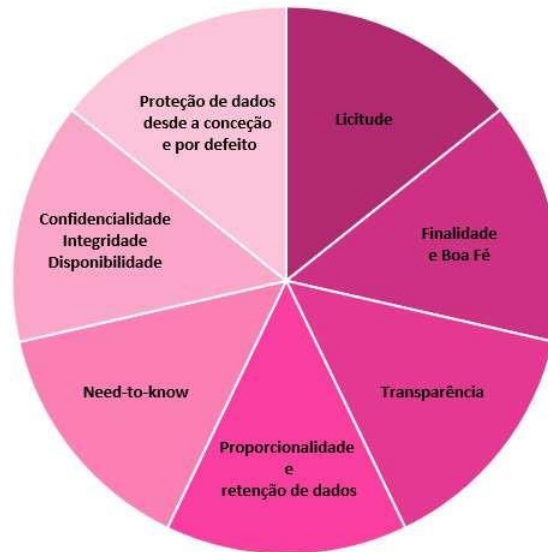
We work every day to ensure the best levels of protection of privacy and personal data, respecting the legislation and all national and European regulations and guidelines applicable to their processing.

We have developed privacy, security, and data protection policies and standards, ensuring that everyone who processes personal data, within the scope of their relationship with GAREN, complies with it and acts in accordance with the principles underlying it.

Fundamental Principles of the Collection, Processing, and Protection of Personal Data





GAREN complies with the fundamental principles of the law in force, Law 67/98 of 26 October, or any other that amends or replaces it and, as of 25 May 2018, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 GDPR.

Princípios Fundamentais da Recolha, Tratamento e Proteção de Dados Pessoais



Lawfulness

Personal data shall be processed, if and to the extent that at least one of the following conditions set forth for lawfulness is met, when:

-  Consent is given by the data subject;
-  It is necessary for the execution and management of a contract;
-  It is necessary for the fulfillment of a legal obligation;
-  It is necessary for the pursuit of a legitimate interest of the company or of a third party

Purpose and Good Faith

Personal data shall be processed exclusively for the purposes for which they were collected and shall only be processed for different purposes when legally permitted and by providing information to the data subject.

Transparency

Data subjects shall be informed in a clear and concise manner about the relevant aspects related to the processing of their personal data, in particular about their purposes of processing and possible transfer to third parties.

Proportionality and storage limitation

Only personal data that are adequate, relevant, and not excessive and for the time strictly necessary shall be processed.

Need-to-know

Only employees and subcontractors whose duties so require shall have access to the personal data processed by GAREN.

Confidentiality, integrity, availability

Personal data shall be processed in such a way as to ensure their security, in particular:

- ☒ Protect against unauthorized or unlawful access or disclosure;
- ☒ Protect against unauthorized or accidental modification, loss, or destruction;
- ☒ Ensure that data is available when necessary and permitted and without undue delay.

Data protection by design and by default

The services provided by GAREN, its support systems, and its internal procedures shall be developed with a view to protecting privacy and personal data.

GAREN also undertakes to be the guarantor of respect for the rights of personal data subjects:

- ☒ The right of access
- ☒ Right to information
- ☒ The right to rectification
- ☒ The right to restriction of processing
- ☒ The right to data portability
- ☒ Right to be forgotten

- ☒ The right to withdraw consent
- ☒ The right to object;
- ☒ The right not to be subject to a decision based solely on automated processing, including profiling
- ☒ The right to lodge a complaint

Security of Personal Data

GAREN respects the best practices in the field of security and protection of information and personal data and has adopted a programme of policies and standards to ensure the confidentiality, integrity, and availability of the information it processes and that is under its responsibility, which is known to all employees and subcontractors.

GAREN's information security policy defines a set of technical and organisational measures in a number of security areas, including:

Logical security measures:

- ☒ Use of firewalls;
- ☒ Intrusion detection systems;
- ☒ Information access and logging policy.

Physical security measures:

- ☒ Control of access to physical facilities where personal data are processed, by employees, subcontractors, customers, and visitors;
- ☒ Restricted access to technological infrastructures;

Other measures:

- ☒ Pseudonymization and anonymization of personal data;
- ☒ Encryption of messages;
- ☒ GAREN is responsible, in compliance with the applicable law, for the personal data that it has to transmit to its subcontractors, and ensures that:

- The sharing of information and personal data complies with the legal rules in force;
- The transmission of data is carried out in a secure manner;
- The subcontractors or third parties are contractually obliged to observe the duties of confidentiality and secrecy and to ensure the security of personal data, which, for this purpose, are communicated to them, and may not use such data for any other purposes, for their own benefit or for the benefit of third parties, nor correlate them with other data that are available to them

Compliance with information security and personal data protection policies and standards is subject to scrutiny, auditing, and controls and is complemented by an information programme for GAREN employees and subcontractors.