

# Manuel Leão Foundation: Privacy, Security and Data Protection Policy

The Manuel Leão Foundation is dedicated to protecting the privacy of the users of its website and digital platforms. Our privacy, security and data protection policy aims at guaranteeing our commitment to and respect for the rules of privacy and personal data protection. As such, in accordance with EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation [GDPR]), the Manuel Leão Foundation (MLF), fiscal identification number 503759716, with registered office at Rua Pinto de Aguiar, 345 – Vila Nova de Gaia, presents the following information:

## 1. Data collection purpose

The data we collect when you engage with our digital platforms are used to ensure the smooth operation of our website, to provide a better browsing experience, and to manage newsletter subscriptions and other relevant information. p

## 2. Types of personal data

The MLF does not process special categories of personal data, as defined by article 9 of the GDPR. Through its web pages, the MLF can collect and process the following personal data:

**a)** information provided by the user or the website when filling in forms. This includes the information provided when registering to use the website, whenever requested, and to benefit from our services, such as activities, information, content placement and others. We can also process the information and the content you provide in your interactions with the MLF, namely via emails requesting information.

**b)** information collected when you browse our website – including IP addresses, information about your computer, including, whenever possible, your operating system and browser – which allows us to operate our web pages more efficiently and makes it easier for you to browse now while also making later visits to the website easier. These data will be processed mainly for statistical purposes – about the movements and browsing patterns of users – and we remain unable to identify any individual through them. However, if the user provides additional information, that could allow for his/her identification. As a rule, this information will be processed through cookies.

The MLF web pages use cookies to ensure a smooth operation and better browsing experience. Cookies allow us to collect data such as location, date and time of access, IP addresses, etc. You can find more information about this subject on our cookie policy page. We only collect the minimum amount of personal information necessary to meet the ends for which they were requested.

Whenever you provide us with personal information, the MLF displays all necessary material concerning the processing of these data and, whenever there is a legal requirement, we will request the consent of the information holder.

### **3. Optional or obligatory nature of personal data provision**

The provision of personal data is, as a rule, optional.

### **4. Rights of personal data holders**

According to the GDPR, data holders are guaranteed the exercise of their legal right to access, rectify, limit, transfer, oppose and delete personal information.

In order to guarantee a clear and unequivocal consent, after you fill in the subscription form, you will receive an email by the MLF asking you to confirm the subscription. You will only receive further content from us once this step has been completed.

In case you consider that your rights have been infringed upon, you can also lodge a complaint with the relevant body in your country. In Portugal, it is the Portuguese Data Protection Authority. Additional information concerning this agency can be found at [www.cnpd.pt](http://www.cnpd.pt).

### **5. Data storage deadlines**

How long we keep your data depends on what we are using it for.

We keep and process your personal data from the moment you subscribe to our newsletter to the moment you cancel your subscription. You can do so by clicking on the link you find in every newsletter. When you cancel, you will receive a notification email, and, under the terms of the law, your data will be removed from our newsletter list.

### **6. Who is responsible for processing your personal data?**

The body responsible for collecting and processing your personal data is the MLF – registered office at Rua Pinto de Aguiar, 345, 4400-252 Vila Nova de Gaia, phone number +351 223708681, [fmleao@mail.telepac.pt](mailto:fmleao@mail.telepac.pt).

In strict compliance with the GDPR, the responsible body defines which data to collect, how the data are processed, and the purpose for which they are used. It also provides data holders with all the necessary information.

Concerning the subscription of our newsletter, the MLF is the responsible body. We use Mailster, at <https://mailster.co>, as a subcontractor. Mailster then acts on our behalf and interest in accordance with the GDPR's chapter 4 article 45, which concerns the body responsible for processing information and the subcontractor.

## **7. Where the data are processed**

Data are processed in the MLF facilities by the MLF staff. Data related to our newsletter is processed by us and by the platform Mailster at their headquarters. The company is self-certified in accordance with chapter 3 of the Commission Implementing Decision (EU) 2016/1250 of 12 July 2016, regarding the level of protection afforded by the EU-US privacy shield, and in accordance with the GDPR.

## **8. Tracking information**

The MLF uses cookies to improve browsing on its web pages and newsletter, and collecting relevant data is essential to guaranteeing that it all operates smoothly and that we are communicating with our subscribers to the best of our ability. To find out more about this subject, please check our cookie policy.

## **9. Privacy of Minors**

Personal data belonging to minors can only be made available on our web pages by the holders of parental responsibility and within the confines of the law. In those cases, the body responsible for processing the data will do all in its power to check that the holder of parental responsibility gave his/her consent or authorization. The MLF cannot be held accountable for the illegal processing of information given by those who commit a fraud by lying about their identity. Our newsletter, being an information society direct service offer, is aimed at people over the age of 16. We do not seek in any way to process information about people younger than 16 and as such only people over 16 can subscribe to our newsletter.

The MLF encourages guardians to take an active role by monitoring how children use the Internet and by informing them of the potential dangers of sharing their personal data online.

## **10. How are your data protected?**

In accordance with the law and the available technology, the MLF provides an adequate level of data protection through the implementation of technical and organizational measures. These assure your data are safe against destruction, loss or accidental alteration, as well as against unlawful access or other non-authorized processing.

The MLF reminds the users of its web pages, however, that no security system can guarantee absolute protection. We remain available to answer any question or comment you may wish to send us concerning the confidentiality and security of your personal data.