

## Privacy Policy and Personal Data Protection

ONE BY BNP PARIBAS - ASSOCIAÇÃO DE COLABORADORES DO GRUPO BNP PARIBAS EM PORTUGAL, hereinafter referred to as “ONE”, is responsible for the website <http://www.one-association.pt/> (hereinafter referred to as “website”) and undertakes to guarantee the privacy of the personal data collected, recognizing the crucial importance that the security and guarantee of confidentiality of the data of the users of the website assume for the Association.

All the personal information collected and processed on this website will help your visit to our website to be the most productive and enjoyable as possible, in accordance with the General Data Protection Regulation (GDPR).

This information concerns you, which is why we invite you to read carefully the following text, in order to understand and learn how ONE collects and processes personal data, and for which purposes.

### ***Privacy policy and protection of personal data***

The privacy and protection of personal data policy covers the terms under which ONE treats the personal data of its users as well as the rights they can exercise, in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council - General Regulation on Data Protection (GDPR) - and other national legislation that may be applicable in matters of privacy and data protection.

When providing personal data to ONE, the holder of personal data consents its treatment in accordance with this Privacy Policy.

This Privacy Policy applies to data directly provided by its owner or when accessing the website.

ONE reserves the right to change its Privacy Policy at any time, advising you to consult this document regularly.

### ***Personal data and Processing of personal data***

**Personal data** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### ***Personal data categories***

In the exercise of its activity, and in order to be able to perform its functions, ONE collects and processes the following personal data of Associates, Collaborators, Suppliers and Partner Entities:

- Identification data (name and surname, marital status, date of birth, gender, civil identification document number);
- Contact details (telephone number, home address, e-mail address);
- Electronic interaction data (IP address, mobile device identifiers, location data);
- other data that may prove to be necessary (IBAN) or convenient for the provision of ONE services, which includes the execution of legal obligations to which the Association is bound.

### ***Basis and purpose of the processing of personal data***

The purposes of processing personal data are interconnected with the execution of contractual and / or associative relationships maintained between ONE and its Associates / Partners / Suppliers / Employees, the management of activities between Associates and Suppliers, administrative management and compliance with legal obligations.

Other treatment purposes:

- Sending of newsletters: data collection to enable the sending of newsletters to the Associates that have subscribed it;
- Application management: Registration and management of spontaneous applications for the purposes of the recruitment process;

The collected data will be treated in accordance with the stated purposes.

As for the legal basis for the processing of personal data, ONE is duly legitimized by the following:

- 1 - consent (whenever there is no other legal basis for processing your data, you will be asked for your express, free, and informed and specific consent for a specific purpose);
- 2 - execution of activities (when the processing of personal data is necessary for the organization, execution and management of the activity in which the data subject is a participant);
- 3 - compliance with a legal obligation (when the processing of personal data is necessary to fulfill a legal obligation to which ONE is subject, such as the communication of data to police, judicial, fiscal or regulatory entities), or

4 - pursuit of a legitimate interest (when the processing of personal data corresponds to a legitimate interest of ONE or third parties, such as improving the quality of the service, detecting fraud, security of people and property, or when the reasons for their use should prevail over the rights of data subjects).

### ***The Controller***

Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

ONE is a non-profit association and legal person with the fiscal number 514 783 575, and organizes cultural, recreational and sporting activities of its members, promoting solidarity and social responsibility activities towards third parties as well. One is based in Rua Galileu Galilei, Torre Ocidente, N<sup>o</sup> 2, 13<sup>o</sup>, 1500-392, Lisboa, and is responsible for the processing of personal data (Controller), in accordance with the provisions of the GDPR, observing its obligations regarding privacy and data protection, carrying out a compliance control of data processing with the applicable rules, clarifying issues related to data processing by its holders. ONE can be contacted via email [one.by.bnp.paribas@bnpparibas.com](mailto:one.by.bnp.paribas@bnpparibas.com)

### ***Personal data collection***

ONE collects personal data as part of the relationship established with the data subject. This collection may contain personal information and anonymous information.

The collection of anonymous information takes place while the holder of personal data visits the ONE website, in order to optimize the operation, management and prioritization of the website content.

The collection of personal information takes place when the collection of personal data is carried out directly with or by the user, and can be carried out orally, in writing, by filling out forms, sending e-mail or using the website.

When collecting and processing data, ONE complies with the applicable legal obligations and observes the principles and rules of treatment, requesting the user's consent, when necessary, processing the information automatically and encrypted, using technical and organizational security measures, in order to protect the personal data of its users against loss, dissemination, alteration, improper or unauthorized access or access.

### ***Duration of processing and retention of personal data***

The processing and conservation of personal data is carried out for the period of time necessary for the fulfillment of the purposes that motivated its collection and conservation, and always in accordance with the law, guidelines and decisions of the CNPD, or, until the holder exercises the right to object, the right to be forgotten or to withdraw the consent previously given (if applicable).

Data retention may also be carried out for the period in which legal obligations or those arising from the commercial and / or associative relationship with the data subjects remain.

### ***Provision of personal data to third parties (Processors)***

**Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

ONE may use a subcontracting entity (ies) (natural or legal person, public authority, agency or other) for the provision of certain services, implying the processing by them of personal data of users, only after ONE written instructions.

The recourse to these Processors depends on the presentation of sufficient guarantees for the execution of appropriate technical and organizational measures, in a way that the treatment meets the requirements required by the GDPR and ensures the defense of the rights of the data subject.

Respect for the provisions of the GDPR is extended to Processors as well, who are bound by the following obligations in the scope of the processing of personal data:

- Respect for the principles of legality, loyalty and transparency when processing personal data, applying the provisions of this privacy policy;
- Respect for the principle of purpose in the processing of personal data: preventing the further processing of data that may be incompatible with the purposes initially established;
- The principle of data minimization: collecting only data considered adequate, relevant and necessary for the purposes of collection and processing;
- The principle of accuracy: whereby accurate and updated data will be maintained, whenever necessary, with all measures necessary to guarantee their integrity being adopted and made available to the holder;
- The principle of concern for data conservation: in order to allow the identification of the holder only during the period necessary for the purposes for which the data are processed;
- The principle of security: protecting your data from possible illegal and unauthorized treatment, preventing possible loss, its destruction or unforeseen damage, adopting all technical and organizational measures appropriate to a data processing that guarantees security, integrity and data confidentiality;

Whenever consent is requested for the processing of data, ONE will provide the necessary information regarding the purposes of the processing, limiting said processing to these purposes.

## ***Rights of holders of personal data***

The holder of personal data has the following rights (which he can exercise through the following email: [one.by.bnp.paribas@bnpparibas.com](mailto:one.by.bnp.paribas@bnpparibas.com) ), within the scope and under the terms of the GDPR and other applicable legislation (reasonable costs may be applied for its effectiveness):

- **Right of transparent information, communications and modalities for the exercise of rights:** ONE takes the appropriate measures to provide to the data subject all relevant information regarding the processing of his personal data, the data processed and his rights and form to exercise them. This information must be provided in a concise, transparent, intelligible and easily accessible manner, using clear and simple language. This information must be provided in writing, orally (if the data subject requests it and his identity is proved by the necessary means) or by other means, including, if necessary, by electronic means;

- **Right to Information** - the right of the data subject to be informed about everything regarding the processing of his data, by ONE or the Processor;

- **Right of Access** - the right to obtain the provision of information about the personal data that ONE holds about the data subject and its processing;

- **Right of rectification** - the right to request the correction and / or update of personal data that are inaccurate or request the inclusion of information (which may be missing) regarding the data subject;

- **Right to erasure (“right to be forgotten”)** - the right to obtain the erasure of the data, having verified the legal requirements for that purpose (no active relationship, beyond the legal period for retaining the data that ONE is subject to);

- **Right to restriction of processing** - the right to request limitation on the processing of your personal data in the form of (1) suspension of processing or (2) limiting the scope of processing to certain categories of data or processing purposes;

- **Right to data portability** - the right to make the personal data provided by the data subject available, in a structured format for current use and automatic reading if the processing is based on consent or a contract to which the data subject is a party and carried out by automated means. The portability right does not include inferred data or derived data, i.e., personal data that is generated by ONE as a consequence or result of the analysis of the data being processed;

- **Right to withdraw consent** - when data processing is based on the data subject's agreement, the data subject has the right to withdraw his consent at any time. The withdrawal of consent does not compromise the legality of the treatment carried out based on the consent previously given,

- **Right to object**- in cases where the data processing is carried out for the purposes of ONE's legitimate interests, or the processing is carried out for the purposes of institutional marketing or profiling based on your personal preferences or interests. You can, at any time, oppose the processing of personal data.

- **Right to notification** - ONE's duty to communicate to each recipient to whom the personal data has been transmitted, any rectification or deletion of the personal data, or limitation of processing, except in cases where such communication proves impossible or involves a disproportionate effort.

- **Right of complaint** - if the holder considers that his data is not being subject to legitimate treatment, he can submit a complaint to the supervisory authority - National Data Protection Commission - he can also exercise the right of complaint with ONE, through the following contacts:

**By e-mail:** [one.by.bnp.paribas@bnpparibas.com](mailto:one.by.bnp.paribas@bnpparibas.com)

**By letter:**

ONE by BNP PARIBAS

Rua Galileu Galilei, Torre Ocidente, Nº 2, 13º, 1500-392, Lisboa

### ***Data breach***

A data breach is a breach of security that causes, accidentally or unlawfully, the destruction, loss, alteration, disclosure or unauthorized access to personal data processed by ONE.

In the event of a data breach, and to the extent that such breach is likely to imply a high risk to the rights and freedoms of Users, Associates, Suppliers, Workers, and Other Employees and / or Partners, we undertake to report such breach to the National Data Protection Commission (CNPD), within 72 hours of becoming aware of the incident, and to the holders of personal data, whenever such breach is likely to imply a high risk to their rights.

### ***Changes to the Privacy Policy***

ONE reserves the right to change this Privacy Policy at any time. Any modification will be duly published.

### ***Applicable law and jurisdiction***

The privacy policy, as well as the collection, processing and transmission of data from Associates, Suppliers, Employees and Partners, are governed by the provisions of the GDPR.

Any disputes arising from the validity, interpretation or enforcement of the Privacy Policy, or related to the processing of personal data, must be submitted to the jurisdiction of the judicial courts of the District of Lisbon, without prejudice to the applicable mandatory legal rules.