

# Privacy policy

StrategikOctopus, Unipessoal Lda holder of the real estate license AMI nº 14871, issued by the Instituto de Mercados Públicos, do Imobiliário e da Construção I.P. (IMPIC, I.P.) headquartered at Rua dos Platanos 173, 6 dto, 2775-353 Parede and VAT number 514589302, is the owner of the domain [www.olivetreerealty.pt](http://www.olivetreerealty.pt), where its WEBSITE is hosted.

StrategikOctopus, Lda is committed to protecting the privacy and personal data of its customers and website users. therefore, it has developed and adopted the present policy and the practices described herein.

This privacy policy explains how your personal data is collected and processed, and we advise you to read it to understand the conditions under which your personal data is collected and used.

Our privacy policy is in accordance with the applicable Portuguese legislation, namely Law No. 58/2019 of August 8 on the Protection of Personal Data, other applicable national laws, and the General Data Protection Regulation (GDPR) 2016/679 of April 27. Data protection legislation is subject to review, and we recommend that users regularly consult our privacy statement. For reference, you can visit the website [www.cnpd.pt](http://www.cnpd.pt). This website complies with national and community legislation. Portuguese courts will have exclusive jurisdiction over any dispute arising from the use of this website.

## 1. WHAT DOES THIS POLICY COVER?

1.1. This Privacy Policy explains how we collect and process the personal data necessary for the provision of services available through the WEBSITE.

1.2. Examples of these services include subscribing to newsletters or contacting us and sending us your application.

1.3. The aim is to provide these services in an efficient and hassle-free manner, describing the practices adopted for this purpose.

## 2. WHAT ARE PERSONAL DATA?

2.1. Personal data refers to any information relating to a person that identifies or can identify them, regardless of the nature and medium of the information, including sound and image.

2.2. Examples of personal data we collect include name, surname, email, and telephone or mobile number.

2.3. Identifiable means a person who can be identified directly or indirectly, in particular by reference to an identification number or other specific elements of their physical, physiological, mental, economic, cultural, or social identity.

### 3. HOW WILL WE USE YOUR PERSONAL DATA?

3.1. StrategikOctopus, Lda will use the personal data you provide us for the following purposes:

- (a) To analyze and respond to your messages, customer support, and information requests;
- (b) To analyze and process your job application to work with StrategikOctopus, Lda ;
- (c) To send newsletters or other publications that you have requested and/or may be of interest to you;
- (d) For website management operations;
- (e) To maintain a record of your contact details;
- (f) For business purposes such as data analysis, audits;
- (g) For fraud prevention and security of information systems;
- (h) To adapt, improve, and modify services, including the identification of usage trends or determining the effectiveness of promotional campaigns.

3.2. These personal data processing operations are essential for your satisfaction and for the activity of StrategikOctopus, Lda , and they are carried out in accordance with applicable legislation and best practices.

3.3. Your personal data will not be reused for purposes other than those previously identified or unrelated to the purposes for which they were initially collected.

### 4. WHAT ARE THE LEGAL GROUNDS FOR PROCESSING THE PERSONAL DATA WE COLLECT?

4.1. The personal data processed by StrategikOctopus, Lda have specific legal grounds depending on the purposes for which they are intended.

4.2. In the following table, you can see the legal grounds according to the above-mentioned purposes:

PURPOSE	BASE	COLLECTED DATA
To analyse and respond to your messages, customer support and enquiries.	Consent for this purpose.	Name, phone number, email address.
So that we can send you newsletters or other publications that you have requested and/or that may be of your interest.	Consent for this specific purpose.	Email address.

For website management operations.	Consent for this specific purpose (cookies); Legitimate interests pursued by StrategikOctopus, Lda .	Cookies, IP address
For commercial purposes, such as data analysis or audits.	Consent for this specific purpose (cookies); Legitimate interests pursued by StrategikOctopus, Lda .	Cookies, IP address
For the fraud prevention and information systems security.	Legitimate interests pursued by StrategikOctopus, Lda .	IP address
For the adaptation, improvement and modification of services, particularly by identifying user trends, or to determine the effectiveness of promotional campaigns.	Consent for this specific purpose (cookies); Legitimate interests pursued by StrategikOctopus, Lda .	Cookies, IP address

**5. HOW DO WE COLLECT YOUR PERSONAL DATA?**

5.1. We will collect your personal data through the forms on the WEBSITE, as well as through the WEBSITE itself and the communication it establishes with your device, and the email messages you send us.

5.2. Your personal data is collected from your device in the following ways:

- (a) Through your contact request;
- (b) Through the submission of an application;
- (c) Through your subscription to the newsletter;
- (d) Through your browser;
- (e) Through cookies;
- (f) IP address.

5.3. StrategikOctopus, Lda is committed to treating your data in accordance with the law and in a legitimate manner.

5.4. StrategikOctopus, Lda will not sell, rent, or share your personal data with third parties, except in cases clearly identified in this Privacy Policy (see Point 9 to understand how).

5.5. StrategikOctopus, Lda services are not directed at minors, and intentional processing of personal data of minors is not carried out.

## **6. WHAT ARE COOKIES?**

6.1. Cookies are small information files that help identify your browser and can store information, such as User settings and preferences.

6.2. StrategikOctopus, Lda will store cookies on your device to personalize and facilitate navigation to the fullest extent, as well as for troubleshooting, statistics, quality assurance, and monitoring system security.

6.3. Except for cookies specifically necessary for the performance of the website, the storage of other cookies will always depend on the User's acceptance and consent, which can be withdrawn at any time through specific browser tools.

6.4. To learn more about the cookies we use, please refer to our Cookie Policy.

## **7. HOW DO WE PROTECT YOUR PERSONAL DATA?**

7.1. Your personal data is kept secure through the adoption of various technical and organizational security measures that ensure that only Employees who need to access the data do so in accordance with established rules.

7.2. To protect your personal data, we only rely on data center providers that offer adequate and documented security measures, including guarantees that your personal data is stored on servers maintained in controlled environments with limited access.

7.3. Personal data is stored on secure servers which provides us with appropriate security guarantees for protecting personal data against unauthorized disclosure, loss, misuse, alteration, unauthorized access, or any other form of unlawful processing.

7.4. Similarly, when you browse the WEBSITE, we protect your data with encryption, such as Hyper Text Transfer Protocol Secure (HTTPS), which is an internet protocol that aims to establish communication between devices and servers worldwide. The HTTPS protocol emerged as an evolution of its predecessor, HTTP, and the difference between them is that HTTPS encrypts device communication.

7.5. Although we take precautions and measures we consider appropriate to protect the personal data you provide and we collect, it should be noted that no security system is impenetrable.

## **8. HOW CAN YOU EXERCISE YOUR RIGHTS:**

8.1. Before explaining how you can exercise your rights, it is important to know what they are. Therefore, the legislation grants you the right to request the exercise of the following rights:

(a) Access: the right to obtain confirmation as to whether personal data concerning you is being processed and, if so, the right to access your personal data;

(b) Rectification: the right to obtain the rectification of inaccurate personal data concerning you and the right to have incomplete personal data completed;

(c) Erasure: the right to obtain the erasure of your personal data when one of the reasons listed in the legislation applies;

(d) Restriction of processing: the right to obtain the restriction of processing if one of the situations listed in the legislation applies;

(e) Objection: the right to object at any time to the processing of personal data concerning you;

(f) Portability: the right to receive the personal data concerning you in a structured, commonly used, and machine-readable format.

8.2. You also have the right to lodge a complaint with the competent supervisory authority (in Portugal, the National Data Protection Commission at [www.cnpd.pt](http://www.cnpd.pt)).

8.3. To exercise the above-mentioned rights, please contact StrategikOctopus, Lda via the following email: [geral@olivetreerealty.pt](mailto:geral@olivetreerealty.pt).

8.4. If you request the deletion of some or all of your personal data, some of the requested services may not be provided to you, and StrategikOctopus, Lda will retain only the personal data necessary to fulfill the legal obligations to which it is bound.

## **9. WHEN DO WE DISCLOSE DATA TO THIRD PARTIES?**

9.1. StrategikOctopus, Lda may rely on third parties for the provision of certain services, such as maintenance, technical support, marketing, billing, or payment management, and these third parties may have access to some personal data, namely, the data necessary for the contracted purposes.

9.2. StrategikOctopus, Lda ensures that the entities that have access to the data are credible and provide high guarantees of protection. They will not be provided with data beyond what is necessary for the provision of the contracted service, while StrategikOctopus, Lda remains responsible for the personal data provided.

9.3. StrategikOctopus, Lda may also disclose data to third parties in the context of investigations, inquiries, judicial and/or administrative proceedings, or similar proceedings, provided that it is duly ordered to do so by a court order.

## **10. THIRD-PARTY WEBSITES.**

10.1. The WEBSITE may contain links to other websites that may collect and process your personal data. The processing of data on these websites is the sole responsibility of the owners of those websites, and StrategikOctopus, Lda assumes no responsibility for their policies and/or practices.

10.2. Examples of such third parties are Facebook, Instagram, YouTube, WhatsApp, and LinkedIn through the buttons present on the WEBSITE.

## **11. DATA TRANSFERS OUTSIDE THE EUROPEAN UNION.**

11.1. In the event of data transfers to third countries outside the European Union, StrategikOctopus, Lda will comply with legal requirements, particularly regarding the adequacy of the destination country with regard to the protection of personal data and the requirements applicable to such transfers. Personal data will not be transferred to jurisdictions that do not provide adequate security and protection guarantees.

## **12. MINORS.**

12.1. The WEBSITE is not intended for individuals under the age of 16, and we kindly request that minors do not provide us with personal data through the WEBSITE, application, social networks and social media, or emails.

## **13. SENSITIVE PERSONAL DATA.**

13.1. StrategikOctopus, Lda kindly requests that you do not send or disclose any sensitive personal data, meaning information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, data concerning health, or data concerning a person's sex life or sexual orientation.

13.2. If you still send or disclose such categories of personal data, they will be promptly deleted.

## **14. CHANGES TO THE PRIVACY POLICY.**

14.1. StrategikOctopus, Lda reserves the right to readjust or change this Privacy Policy at any time, with such changes being advertised.

## **15. OUR CONTACT DETAILS.**

15.1. If you have any questions or concerns regarding this Privacy Policy, please contact us in writing via email at [geral@olivetreerealty.pt](mailto:geral@olivetreerealty.pt)