

****PRIVACY POLICY AND COOKIE POLICY****

Cumberland Website

This Privacy and Cookie Policy governs the processing of personal data of users (hereinafter "User" or "Users") collected through the use of the Cumberland website (hereinafter "Site") by Cumberland Lda., as the entity responsible for processing.

The provision of personal data implies knowledge and acceptance of the conditions set forth in this Privacy Policy.

This Privacy Policy is complemented by the Terms of Use available at www.cumberland.pt

****Collection and Processing of Personal Data****

Accessing and using the Site does not require the User to provide personal data.

However, using certain Site functionalities, such as filling out information request forms, will require providing personal identification (name) and contact (address, email, telephone) data.

Cumberland Lda. is responsible for collecting and processing User personal data on the Site, in accordance with the terms and for the purposes indicated in the applicable data protection legislation.

These data will be processed by Cumberland Lda. to carry out pre-contractual measures at the request of potential clients through our form available at www.cumberland.pt. With the User's consent, their data may also be processed when contacting us for clarifications through our form available at www.cumberland.pt or to receive marketing communications (including campaigns and promotions about our services and products), as well as to subscribe to our newsletter.

****User Rights****

Under applicable law, the User may exercise, at any time, rights regarding their personal data:

1. ****Right of Access:**** Obtain confirmation of what personal data concerning them is being processed and obtain a copy of the personal data being processed.
2. ****Right to Rectification:**** Request the rectification of their inaccurate personal data or request that incomplete personal data be completed.
3. ****Right to Erasure:**** Obtain the erasure of their personal data, provided there are no valid grounds for its retention.
4. ****Right to Restriction of Processing:**** Request the restriction of the processing of their personal data by requesting the suspension of processing or limitation of the scope of processing to certain categories of data or processing purposes.
5. ****Right to Data Portability:**** Receive the data they have provided in a commonly used digital format and request the direct transmission of their data to another entity that becomes the new controller of their personal data.
6. ****Right to Object:**** Object at any time to data processing, such as in the case of data processing for marketing purposes;
7. ****Right to Object to Automated Decision Making:**** Not to be subject to any decision based solely on automated processing, including profiling, that produces legal effects concerning them or significantly affects them in a similar way.

Under the law, the User is also guaranteed the right to withdraw their consent for data processing for the indicated purposes at any time through the aforementioned means, without invalidating the processing carried out until that date based on previously given consent.

To exercise any of the above rights, the User must submit a written request addressed to Cumberland Lda. at the following contacts:

Email: manuel.rocha@cumberland.pt

Address: Avenida Jaime Cortesão, No.22, 3.A, 1495-138 Algés, Portugal

****Retention of Personal Data****

The personal data collected are processed in strict compliance with applicable law. Personal data will be stored and retained only for the period necessary for the purposes for which they were collected, as identified above.

****Sharing of Personal Data****

Cumberland Lda. may transmit User data to subcontractors for the purposes mentioned above, in accordance with the contracts concluded with them.

User data may also be disclosed to third parties when transmission is carried out to comply with a legal obligation, a decision of the National Data Protection Commission or another relevant supervisory authority, or a court order; or when the disclosure is made to protect the vital interests of Users or any other legitimate purpose provided for by law.

****Security Measures****

Cumberland Lda. makes its best efforts to protect Users' personal data against unauthorized access over the Internet. To this end, security systems, rules, and other procedures are used to ensure the protection of personal data and prevent unauthorized access, improper use, disclosure, loss, or destruction.

However, it is the responsibility of Users to ensure that the computer used to access the Site is adequately protected against harmful software, computer viruses, and worms. Additionally, Users should be aware that without adopting appropriate security measures (e.g., secure browser configuration, updated antivirus software, and not using dubious source software), the risk of unauthorized access by third parties to personal data and passwords is increased.

****Cookie Policy****

A cookie is information automatically placed on users' computers or mobile devices when they access certain websites. The cookie identifies the browser program on the server, allowing information to be stored, for example, to enhance Users' experience and analyze and review Site performance.

****Cookies - Types of Cookies****

There are several types of cookies.

Considering the lifespan of cookies, these can be:

- ****Permanent Cookies:**** These are cookies that remain stored even after closing the browser on your access devices (PC, mobile, and tablet) and are used whenever you make a new visit to one of our websites or applications. They are usually used to direct navigation to user interests, allowing us to provide a more personalized service.
- ****Session Cookies:**** These are temporary cookies that remain in your browser's cookie file until you leave the website or application. The information obtained through these cookies is used to analyze web traffic patterns, allowing us to identify problems and provide a better browsing experience.

Considering the domain to which they belong, cookies can be:

- ****First-party Cookies:**** These are cookies sent to the user's terminal equipment from a device or domain managed by Cumberland Lda. and from which the requested service is provided to the user.
- ****Third-party Cookies:**** These are cookies sent to the user's terminal equipment from a device or domain that is not managed by Cumberland Lda., but by another entity that processes the data collected through cookies.

All browsers allow Users to accept, reject, or delete cookies, including by selecting appropriate settings in their respective browsers.

If your browser's privacy settings are set to "High," you may not be able to access some of our services and may be prevented from fully using all the features of our websites or applications. To resolve this issue,

add our Internet addresses to the list of permitted websites in your browser's privacy settings, such as: www.cumberland.pt

If you are accessing our websites through a corporate computer and cannot access them, the problem may be in the corporate computer's security settings. We recommend that you contact your system administrator.

For more information about cookies in general and/or how to disable them, Users may visit www.allaboutcookies.org, where they can find information on managing their browsing settings.

However, please note that by disabling cookies, Users may partially or completely affect their browsing experience on the Site.

****Complaints****

Without prejudice to any other administrative or judicial recourse, the User has the right to file a complaint with the competent supervisory authority under the law (the National Data Protection Commission, CNPD) if they believe that Cumberland Lda.'s processing of their data violates the applicable legal framework at any given time.

****Questions and Suggestions****

Users may contact Cumberland Lda. regarding all matters related to the processing of their personal data and the exercise of the rights conferred by applicable law and specifically mentioned in this Policy, through the following contacts:

Email: Manuel.rocha@cumberland.pt

Address: Avenida Jaime Cortesão, No.22, 3.A, 1495-138 Algés, Portugal

****Changes to Privacy and Cookie Policy****

Cumberland Lda. reserves the right to change these terms of personal data processing at any time. These changes will be duly advertised on the Site.

However, whenever significant changes are made regarding cookies for Users, a pop-up window will appear again so that, depending on the type of cookie in question, Users can access information and/or consent to its use and storage.