

PRIVACY AND COOKIES POLICY

The security and privacy of personal data are important to FinScore, Lda. and to our credit intermediation process managers. We therefore provide our services in strict compliance with the applicable legislation on the protection of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, applicable from 25 May 2018 (hereinafter the “GDPR”).

We are committed, whenever necessary to explaining how FinScore, Lda. will use your data to help ensure that you find the best credit options, and to ensure that all information collected is stored securely, both by FinScore, Lda. and by the other partner entities with which we work.

This Privacy Policy explains what personal data we collect about users of our website and our clients, how and why we use it, with whom we share it, and how we protect your privacy.

In order to provide you with the information requested through the forms available on our website, or to send you our communications, we need to process your personal data. For clarification of the legal bases, purposes and conditions applicable to the processing of your personal data, we summarize the relevant information below.

This Privacy Policy may be amended and updated at any time, with new versions being published on the Website.

1. Personal data collected

PURPOSES	CATEGORIES OF PERSONAL DATA	LEGAL BASIS	RETENTION PERIOD
Sending FinScore, Lda. newsletters by email, WhatsApp and SMS.	Name, email address, telephone number.	Data Subject's consent.	Until consent is withdrawn.
Direct marketing and sending communications regarding FinScore, Lda. services and campaigns by email, WhatsApp and SMS.	Name, email address, telephone number.	Data Subject's consent.	Until consent is withdrawn.
Processing information requests submitted through forms available on the website.	Name, address, email address, telephone number and any other data the User may voluntarily enter in the fields intended for "type of credit" and "comments".	Legitimate interest of the Controller/FinScore, Lda. in responding to requests from interested parties/Users.	Up to 180 (one hundred and eighty) days after the response is sent (the response being provided within 30 days of receipt of the information request).
Management of any complaints submitted by the User regarding the services presented on the FinScore, Lda. website.	Name, address, email address, telephone number and any other data the User may voluntarily provide.	Legitimate interest of the Controller/FinScore, Lda. in responding to Users' requests and improving the quality of its services.	Up to 180 (one hundred and eighty) days after the response is sent (the response being provided within 30 days of receipt of the information request or complaint).

2. Responsibility

References in this Privacy Policy to "FinScore", "we", "us" or "our" mean FinScore, Lda., a company with registered office at Rua Ladislau Patrício, No. 6 F, 1750-136 Lisbon, Portugal.

For the purposes of data protection legislation, we are the "Controller" of the personal data provided and processed through this website ("Website"), of personal data collected directly from the Data Subject, and of personal data not collected directly from the Data Subject but provided through contractual data sharing arrangements with FinScore partners.

If you have any questions regarding the protection of your personal data or the way FinScore, Lda. handles privacy or security matters, you may contact our responsible person at geral@finscore.pt.

Finscore Lda

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3. Rights

Under applicable legislation, Website Users and Clients have the **right to access their data** and the **right to rectification** whenever they consider that their data is incomplete or inaccurate. They also have the **right to object**, at any time and free of charge, to the processing of their personal data for direct marketing purposes. They also have the **right to withdraw their consent at any time**, without affecting the lawfulness of processing carried out on the basis of consent before its withdrawal.

They also have the **right to be informed before their personal data are disclosed to third parties** for the first time for direct marketing purposes or used on behalf of third parties, and to be expressly granted the right to object, free of charge, to such disclosures or uses. In addition, they have the **right not to be subject to decisions based solely on automated processing**, including in targeted marketing campaigns.

If Website Users and Clients wish to obtain access to the personal information held by FinScore, Lda. about them, they may submit a request to **geral@finscore.pt**. If Website Users or Clients have any questions about how to proceed, they may contact FinScore, Lda. on business days, between 9:00 a.m. and 6:00 p.m., at +351 964 118 216.

Website Users and Clients may also contact us to **object to the processing of their personal data, request their deletion, request restriction of processing**, or exercise their **right to data portability**, in accordance with and within the limits established by applicable legislation. They also have the **right to request that third parties be notified of the rectification, erasure or restriction of processing** of their personal data.

In addition, Website Users and Clients may submit a complaint concerning any services provided by FinScore, Lda. by email to **geral@finscore.pt**, expressly and specifically stating the grounds for the complaint and all identifying information relevant to it.

Responses may be provided by the same means within 30 (thirty) days of receipt of the complaint, although the response period may be extended for particularly complex requests. In such cases, FinScore, Lda. will inform Users of the need to extend the response period by an additional 30 (thirty) days, stating the reasons for the extension.

Website Users and Clients also have **the right to lodge a complaint with the CNPD** (Portuguese Data Protection Authority) concerning matters relating to the exercise of their rights and the protection of their personal data at www.cnpd.pt.

4. Data sharing

The personal data of our Users and Clients will not be transferred to third parties, except where:

- FinScore, Lda. has the express written authorization of the Website Users and Clients;
- required by law; or
- strictly necessary to ensure compliance with our terms of use, rights or ownership.

Credit intermediation process managers may have access to your personal data for the purposes of contacting you and presenting FinScore, Lda. services; however, they are subject to a duty of confidentiality in relation to any data to which they have access in the course of operations involving the respective database.

Credit intermediation process managers and all FinScore, Lda. employees are duly informed of the importance of complying with this legal duty of secrecy and are responsible for complying with this confidentiality obligation.

FinScore, Lda. also acts as a partner of several companies, actively supporting Clients in the purchase of real estate, namely through partner companies operating in the real estate brokerage sector. Nevertheless, FinScore, Lda. is subject to duties of secrecy and confidentiality in the performance of its activities.

Personal data are only transferred to third-party entities where prior authorization and explicit consent exist within the relationship with the Client and/or where the Processors appointed by FinScore, Lda. likewise ensure compliance with the confidentiality of Clients' personal data and with the other applicable data protection requirements.

As a tied Credit Intermediary, registered with the Banco de Portugal under No. 0007407 and authorised to provide advisory services and credit intermediation services (presentation or

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proposal of credit agreements to consumers; assistance to consumers through preparatory acts or other pre-contractual management work relating to credit agreements that were not presented or proposed by FinScore, Lda.), FinScore, Lda. will intermediate the credit application with the various partners with which it has tied partnership agreements, namely:

- Banco Santander Totta, S.A.
- Banco BPI, S.A.
- Caixa Geral de Depósitos, S.A.
- Novo Banco, S.A.
- ABANCA Portugal, S.A.
- Banco CTT, S.A.
- Bankinter, S.A. – Portugal Branch
- Union de Créditos Imobiliários, S.A.
- Caixa Central – Caixa Central de Crédito Agrícola Mútuo, C.R.L.

FinScore, Lda. may use remarketing practices for online advertising. This means that Website Users and Clients who do not opt out of the Google Display Network may be exposed to FinScore, Lda. advertisements across the Google content network. Third parties, such as Google or Facebook, may display FinScore, Lda. advertisements on websites within their content networks and may also use Cookies (such as Google Analytics and DoubleClick Cookies) to optimize advertisements based on Users' and Clients' previous visits to the website.

The website may also use Google Analytics for Display services, namely the remarketing function. This function consists of displaying advertisements to Users and Clients who have previously visited the website.

You may choose not to accept Google Analytics for Display Advertisers and not be exposed to advertisements on the Google Display Network. To do so, you may access the Ads Preferences Manager and the Analytics Opt-out Browser Add-on.

5. Storage personal data

The period for which personal data are stored varies according to the purpose for which the information is processed. FinScore, Lda. will retain the personal data of Website Users and Clients until consent is withdrawn.

Accordingly, whenever there is no specific legal requirement, data will be stored only for the minimum period necessary for the purposes for which they were collected or subsequently processed, or for the period authorized by the Portuguese Data Protection Authority (CNPD), after which FinScore, Lda. will use its best efforts to ensure that the relevant personal data are deleted from all databases in which they are held.

6. Technical and organizational measures and security of processing

All information received by FinScore, Lda. from Website Users and Clients will be stored in OneDrive, with restricted access protected by password, as well as on external hard drives archived in a locked cabinet with restricted access to its Credit Intermediary.

In cooperation with our technology partners, we will implement the technical and organizational measures necessary to ensure that personal data are protected with an appropriate level of security, guaranteeing, in particular, the confidentiality and integrity of the data and preventing their accidental or unlawful destruction, loss or alteration, as well as unauthorized disclosure or access.

Nevertheless, despite the measures implemented to protect your data, every User should be aware that the transmission of information over the Internet or other open networks is never completely secure, and there is a risk that data may be viewed or used by unauthorized third parties.

FinScore, Lda. recommends that all Internet users adopt additional security measures, including ensuring that they use a device and browser with up-to-date security patches, properly configured, with an active firewall, antivirus and anti-spyware, and that they verify the authenticity of websites they visit online and avoid websites whose reputation they do not trust.

7. Links to other websites

The Website may contain links to other websites or applications, including those of our partners. If you access one of these links, please note that each website or application will have its own privacy policy and FinScore, Lda. cannot be held responsible for those policies. We recommend that you read the privacy policies of other websites before submitting personal data through them.

8. Contact details

For any additional information, or to exercise your rights, you may contact FinScore, Lda. at +351 964 118 216, on business days from 9:00 a.m. to 6:00 p.m., or by email at geral@finscore.pt.

9. Cookies

Cookies are files stored on the User's device/computer to provide website functionality and to store User preferences on the device/computer. In other words, cookies may be essential for website navigation.

The website uses cookies that generate data relating to Users' and Clients' use of the website (for example, the time spent on the website). Our strictly necessary cookies do not identify the User and do not use personal data and are not used to identify the User on the website.

Our cookies are used to retain information about Users' choices and to collect performance indicators.

Our website may use cookies subject to prior and express consent. Alternatively, you may manage cookie acceptance.

Our commitment is to use cookie storage only for the purposes described above. Refusing all cookies may affect access to certain content available on our website.

Please note that the use of cookies is essential for the proper functioning of the website, and their acceptance is therefore recommended.

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The categories of cookies we use, or may use, are:

- **Strictly necessary cookies:** These are essential because they ensure navigation on the website and use of its functionalities, including recording whether the User has authorised the use of cookies by webpage. These cookies cannot be rejected when using a website.
- **Marketing cookies:** These cookies collect information about a User's browser usage habits and record website usage. They are used to support more targeted marketing and communication activities, allowing individual usage preferences to be distinguished and identified or a code to be stored that enables a set of usage habits or preferences to be translated.

Any advertising cookies that we may use belong to Facebook and Google. We invite you to consult Facebook's Cookie Policy and Google's Cookie Policy.

- **Statistical cookies:** These cookies are used to analyze how Users and Clients use the website and to monitor its performance, for example, which pages receive the highest volume of visits or whether an error message is returned to the User. This enables us to provide high-quality experience, personalize our offer, and quickly identify and correct any problems that arise. These cookies are used for continuous improvement and statistical analysis.

For this purpose, the analytics tools used are Google Analytics and Facebook, together with their respective cookies. We invite you to consult Google Analytics Privacy Policy and Facebook's Privacy Policy.

FinScore corporate entity no. 517 562 642, with its registered office at Rua Ladislau Patrício, No. 6 F, 1750-136 Lisbon, tied credit intermediary registered with the Bank of Portugal under No. 7407. Authorised to provide advisory services and authorised to provide credit intermediation services (Presentation or proposal of credit agreements to consumers; Assistance to consumers through the performance of preparatory acts or other pre-contractual management activities relating to credit agreements that have not been presented or proposed by the intermediary). Lenders: Banco Santander Totta, SA; Banco BPI, SA; Caixa Geral de Depósitos, SA; Novo Banco, SA; ABANCA Portugal, S.A; Banco CTT, SA; Bankinter, S.A. – Sucursal em Portugal; Union de Créditos Imobiliários, S.A; Caixa Central - Caixa Central de Crédito Agrícola Mútuo, C.R. L.

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