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Privacy Policy

1. Introduction

Priberam S.A., registered at the *Conservatória do Registo Comercial de Lisboa*, under the single registration and legal person number 502 237 740, with share capital of 100,000 €, head office in Lisbon, at Alameda D. Afonso Henriques, 41 – 2nd floor, postal code 1000-123 Lisboa, Portugal, hereinafter referred to as Priberam is the *Data Controller*.

Priberam understands the importance of *Privacy* for *Clients* and *Users* and is committed to safeguarding your *Personal Data* in accordance with applicable laws and regulations.

Access to or use of Priberam's services and products requires prior agreement to this *Privacy Policy*, which describes how personal information obtained in connection with the use of Priberam's services and products is collected, used and protected.

If you have any questions or concerns regarding this *Privacy Policy*, please do not hesitate to contact us using the contact details provided at the end of this document [paragraph 7].

1.1 Update

This *Privacy Policy* may be modified at any time, without prior notice and with immediate effect, namely, but not exclusively, following the approval of legislative changes. Changes will be publicised on the websites and, if necessary, *Users* will be asked to renew their consent.

Last updated: 21-Mar-2025

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Previous Version: [Rev. 2023.04.EN, 25-Jul-2023](#) | [Change History](#)

PT version: [Rev. 2025.01, 21-Mar-2025](#)

2. Definitions

Within the scope of this *Privacy Policy* including any amendments thereto, the expressions listed below shall have the meanings indicated therein.

- 2.1 **GDPR:** *General Data Protection Regulation*, approved by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, in force since 25 May 2018 and whose execution in the Portuguese legal order is ensured by the “*Lei de Proteção de Dados Pessoais*”, approved by Law no. 58/2019, 8 August.

The general objective of the GDPR is to establish a uniform regime for the protection and free movement of *Personal Data* of natural persons throughout the European Union, which is applied consistently and ensures a balance between the rights of *Data Subjects* and other constitutionally enshrined rights.

For your convenience General Data Protection Regulation @ EUR-Lex is available [here](#).

- 2.2 **Personal Data:** any information relating to an identified or identifiable natural person. [cf. Art. 4(1) GDPR]

- 2.3 *Data Subject*: natural person to whom the *Personal Data* relate. [cf. Art. 4(1) GDPR]
- 2.4 *Processing*: an operation or set of operations which is performed on sets of *Personal Data*, whether or not by automated means, such as collection, recording, organisation, erasure or alteration. [cf. Art. 4(2) GDPR]
- 2.5 *Data Controller*: natural person; 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*. [cf. Art. 4(7) GDPR]
- 2.6 *Data Protection Officer (DPO)*: is an individual person whose mission in an organisation is to ensure that *Processing* is carried out in compliance with the GDPR. [cf. section 4 of GDPR].
- 2.7 *Supervisory Authority*: independent public body that monitors the application of the GDPR. [cf. Art. 51 GDPR]
- 2.8 *National Supervisory Authority*: CNPD – *Comissão Nacional de Protecção de Dados* (National Commission for Data Protection), whose contact details can be found at www.cnpd.pt, is the Portuguese *Supervisory Authority*:
- 2.9 *Priberam Domains*: Priberam.com, Priberam.care, PriberamCare.com, Priberam.org, FLiP.pt, LegiX.pt, monitio.com, oanoempalavras.pt e plainX.com, together with their respective subdomains.
- 2.10 *Client*: natural or legal person who has contracted or purchased a service or product from Priberam.
- 2.11 *User*: natural person who uses a service or product provided by Priberam.
- 2.12 *Terms and Conditions of Use*: consists of the document that regulates the contractual relationship between Priberam and the *Client* and/or *User*, by itself or together with a contract, also referred to as “*Terms of Service*” (ToS), ‘*Terms and Conditions*’ or “*License Agreement*”.

3. Priberam Websites and Applications

Priberam’s Websites and Applications are located under *Priberam Domains*.

Priberam’s Websites and Applications, may have public areas and restricted areas subject to prior registration of the *Users* and/or subscription of the underlying service.

Irrespective of their public or restricted nature, the use of all the Priberam’s Websites and Applications is subject to the prior agreement and acceptance of the generic and/or specific *Terms and Conditions of Use* of each one of them, of which this *Privacy Policy* is an integral part.

Priberam's use of *Cookies* on its Websites and Applications is explained in the [Priberam Cookie Policy](#) that forms an integral part of this *Privacy Policy*.

4. Data Collection

4.1 Principles relating to the *Processing of Personal Data*

This *Privacy Policy* is based on the principles relating to the *Processing of Personal Data* established in article 5 of the GDPR, as well as in the subsequent execution of the processes associated with this *Processing*.

4.2 Lawfulness of Collection and *Processing*

Under the terms of Article 6 of the GDPR, Priberam collects data in the context of processes in which at least one of the following situations occurs:

4.2.1 With the consent of the *Data Subject* for one or more of the specific purposes described at the time consent is requested. [subparagraph (a)]

4.2.1.1 Minors: In compliance with the principle of *data minimisation* stipulated in article 5, paragraph 1 (c) of the GDPR, Priberam does not request the age of the *Data Subject*, and therefore does not know whether or not he/she is legally entitled to give his/her consent.

4.2.1.2 Marketing Communication: To send marketing materials to *Users*, Priberam uses third-party email marketing services, such as *Mailchimp*. *Processing of Personal Data* for marketing purposes is based on user consent (Article 6(1)(a) GDPR). *Users* may withdraw their consent at any time by clicking "*Unsubscribe*" in any received email.

4.2.2 For the performance of a contract to which the *Data Subject* is a party, as a *Client* and/or *User*, but which, in any case, he/she can only use after having accepted the *Terms and Conditions of Use* of the product or service. This provision applies to both paid and free products or services. [subparagraph (b)].

4.2.3 In the context of pre-contractual procedures at the request of the *Data Subject*, in particular, but not exclusively, after requesting information, proposals or access periods for the evaluation of products and services. [subparagraph (b)]

4.2.4 To comply with legal obligations to which it is bound. [subparagraph (c)]

4.2.5 For the purposes of its legitimate interests [subparagraph (f)] including, but not limited to, those related to:

a) traffic analysis on websites;

b) the use of advertising on the sites, namely on those where services are provided free of charge and for which advertising helps to support their costs. In this context, Priberam uses Google's services, for which we suggest consulting the document ["We are committed to complying with applicable data protection laws"](#).

5. Data Usage

5.1 General Principles

Priberam's use of the data it collects respects the purpose and scope in which it was collected, as stipulated in section 4 ("Data Collection").

5.2 *Clients and Users*

As a *Client* or *User*, data *Processing* is carried out in the following scopes:

5.2.1 For the performance of all legal obligations arising from the contracting and use of the service or product to which they relate;

5.2.2 For communications directly associated with the contracting and provision of the service;

- 5.2.3 To provide information about the evolution of products and services that it uses / contracts, including, but not limited to, the availability of updates and/or new versions.

5.3 Transfer of *Personal Data* to Third Parties

Priberam only discloses to third parties the *Personal Data* it collects, in compliance with the principle of *data minimisation* stipulated in article 5, paragraph 1 (c) of the GDPR and when technically or legally required to do so, namely, but not exclusively, in the following situations:

- 5.3.1 Transmissions related to payments and/or reporting invoices to the *Autoridade Tributária* (Tax Authority);
- 5.3.2 When communicating, whether using third-party services, for example, to send information, namely by email;
- 5.3.3 In compliance with a legal obligation to respond to a request from a competent authority, such as regulatory authorities, criminal law enforcement agencies or courts;
- 5.3.4 To take action in the legitimate interest of Priberam to defend its rights or to protect its *Clients* and/or *Users*.

6. Rights of the *Data Subject*

6.1 Revocation of the Authorisation for Treatment

At any time, the *Data Subject* may revoke the authorisation he or she has given under point 4.2.1, article 6, paragraph 1 (a) of the GDPR, without prejudice to Priberam nevertheless *Processing* such data when:

- 6.1.1 They have been collected in the context of the conclusion of a contract (4.2.2);
- 6.1.2 Are required for the fulfilment of legal obligations (4.2.4);
- 6.1.3 Are essential for the proof of transactions (5.3.1);
- 6.1.4 Are necessary within the scope of actions to defend and/or protect the rights of Priberam, its *Clients* and/or *Users* (5.3.4).

In any event, *Revocation of the Authorisation for Treatment* shall have at least the effect of expressing the wish to object to any kind of treatment which does not fall within the exceptions set out above.

6.2 Security and Safeguarding

- 6.2.1 Priberam has implemented physical, computational and legal security measures to ensure the integrity of *Personal Data* and protect them against unauthorised access, use and disclosure;
- 6.2.2 The service providers that may be used within the scope set out in point 5.3.2 must guarantee the same level of information security assured by Priberam.

6.3 Data Access

The *Data Subject* has the right to obtain confirmation from Priberam that their data are or are not being processed and, if this is the case, the right to access them and to know the purpose of the *Processing* to which they are subject and other information provided for under article 15 of the GDPR.

6.4 Rectification

The *Data Subject* has the right to have incorrect data rectified under the terms of article 16 of the GDPR.

6.5 Erasure ("right to be forgotten")

The *Data Subject* has the right to request the erasure of his or her data pursuant to article 17 of the GDPR. The erasure shall be made without undue delay unless the retention of the data is necessary for one of the reasons stipulated in paragraph 3 of the same article, in particular, but not exclusively, when the data:

- 6.5.1 Have been collected in the context of the conclusion of a contract (4.2.2);
- 6.5.2 Are required for the fulfilment of legal obligations (4.2.4);
- 6.5.3 Are essential for the proof of transactions (5.3.1);
- 6.5.4 Are necessary within the scope of actions to defend and/or protect the rights of Priberam, its *Clients* and/or *Users* (5.3.4).

6.6 Restriction of Processing

The *Data Subject* has the right to obtain from the *Data Controller* the *Restriction of Processing*, under the terms of Article 18 of the GDPR.

Restriction of Processing may be used instead of *erasure* when *erasure* has been requested and cannot be carried out for one of the reasons described in point 6.5.

6.7 Portability

The *Data Subject* has the right to receive from Priberam their *Personal Data* and also to have it transmitted to another *controller* party under the terms of article 20 of the GDPR.

6.8 Breach Notification

The *Data Subject* has the right to be notified in the event of a data breach likely to result in a high risk to their rights and freedoms, as stipulated and in accordance with article 34 of the GDPR.

7. Contacts

If you have any questions regarding this *Privacy Policy*, as well as any doubts or concerns about the use of your *Personal Data*, or if you wish to exercise any of the aforementioned rights, in addition to the Priberam address indicated above, you have the following contacts at your disposal:

- *Data Protection Officer*: DPO@priberam.com
- *Email*: Privacy@priberam.com
- Tel.: +351 217 817 260 [call to the Portuguese landline network]