



PRIVACY POLICY

This Privacy Policy is intended to provide all relevant information about the data collection activities and the processing of your personal data through the use of this website, including data that may be provided to us through the website when subscribing to our newsletter, requesting information about our projects or services, or participating in a survey and/or contest that may be launched.

This privacy policy should be read together with, and as a complement to, any other privacy information or notice provided by us in specific cases.

This website is not intended for children, and we do not knowingly collect data from children.

1. WHO WE ARE

EPISODESECRET, S.A., a public limited company, with headquarters at Rua da Moeda, n.º 4, 1200-275 Lisbon, registered at the Commercial Registry Office under the unique registration and tax identification number 515176303, with share capital of € 50.000,00 (fifty thousand euros) ("**EPISODESECRET**"), whose corporate purpose is the buying and selling of real estate and resale of acquired properties for the same purpose, real estate promotion, consultancy, management and support of real estate projects, marketing of real estate products, projects and implementation of real estate investments, as well as the administration of own and third-party properties; rental, condominium management, operation of real estate and tourist developments, including local accommodation.

We may collect, use, store, and transfer different types of your personal data, which we group as follows:

2. DATA CONTROLLER

EPISODESECRET is the data controller responsible for the personal data it collects, and individuals can contact us to clarify any doubts they may have or to exercise their rights through the following contacts:

EPISODESECRET

Headquarters: Rua da Moeda, 4, 1200 - 275 Lisbon

Tax Identification Number: 516117564

Phone: (00 351) 213461024

E-mail: cp@habitatinvest.pt

3. WHAT PERSONAL DATA DO WE COLLECT?

Personal data means information relating to an identified or identifiable living person. Personal data also means all elements of the data that can serve to identify a particular person.

We may collect, use, store, and transfer different types of your personal data, which we group as follows:

- a. **Identification data**, namely, and when applicable, name, title, date of birth, gender;
- b. **Contact data**, namely, address, email address, and telephone numbers;

- c. **Financial and billing data**, namely, and when applicable, Tax Identification Number and International Bank Account Number (IBAN);
- d. **Technical data**, namely, and when applicable, IP address, login data, browser type and version, operating system and platform, and other technologies of the devices used to access the website;
- e. **Website usage data**, namely, information about how our website, products, and services are used;
- f. **Communication and marketing data**, namely, and when applicable, user preferences regarding communication and marketing.

We do not collect any special **categories of personal data about you**, namely, data concerning health, biometric data, genetic data, data concerning sex life, religious or philosophical beliefs, and political opinions, trade union membership, or any data revealing racial or ethnic origin.

4. HOW DO WE COLLECT PERSONAL DATA?

Personal data may be collected in different ways, primarily through direct interaction with the data subject, who provides their data by filling out forms or by contacting us by mail, telephone, email, or other means, namely, by requesting information about our real estate products, subscribing to our news or newsletters, or requesting the sending of marketing communications or other interactions within the scope of our activity. We may also collect personal data from public sources or from third parties authorized to share such data.

It is also possible to automatically collect data through interaction with this website, namely, technical data and website usage data. For more information, data subjects should consult our **Cookie Policy** (see point 11.).

5. HOW AND FOR WHAT PURPOSE DO WE USE YOUR PERSONAL DATA

We only process personal data when, first, the processing is required to fulfill legal obligations applicable to us, or when the processing operation is required for the performance of a contract or pre-contractual measures associated with it.

We may also process information if we have a legitimate interest to do so, provided that, in each case, our interest is in accordance with applicable law and the rights of the data subject; the foregoing may occur, in particular, for the purpose of communicating with our customers, recruiting employees, preventing and investigating fraud, providing information about investment projects, providing additional information, answering questions or requests for information about investment opportunities.

Whenever none of the other legitimacy conditions is capable of supporting the data processing operation, we should only process the information if we have obtained the data subject's consent to process their personal data for specific, explicit, and legitimate purposes.

6. INTERNATIONAL TRANSFERS AND DATA DISCLOSURE

Unless expressly stated in this document or in any additional privacy notice, we shall not transfer your personal data outside the European Economic Area (EEA).

To fulfill legal obligations, we may have to share your personal data with external entities that provide us with services, namely, IT system and administration service providers, professional consultants, among others, consultants, auditors, and insurers established in the EEA, as well as with public regulatory and tax authorities and other entities.

7. DATA SECURITY

Your personal data is important to us, and for that reason, we have implemented appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized manner, altered or disclosed, as well as internal procedures to respond to any risks associated with the processing of this data.

We have also made every effort to ensure that third parties cooperating with us as partners or service providers contractually guarantee the adequate protection of the personal data to which they may eventually have access. We limit access to personal data to specific employees/workers and only when their contact with personal data is justified within the scope of their functions.

8. MAXIMUM RETENTION PERIOD FOR PERSONAL DATA

Your personal data will only be retained for as long as necessary to meet the purposes for which it was collected, including for compliance with legal, tax, and accounting requirements.

To determine the appropriate retention period for personal data, we take into account the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process it, and whether we can achieve those purposes through other means, as well as applicable legal requirements.

More specifically, and without any limitation, we are required by law to retain basic information about our customers (including contact, identification, financial, and transaction data) for tax, financial, auditing, and registration purposes, for a minimum period of 10 years from the moment our customers cease to be our customers.

In certain circumstances, the data subject may request the deletion of their data.

9. DATA SUBJECT RIGHTS AND EXERCISE THEREOF

Under certain circumstances and in accordance with data protection law, data subjects have rights regarding their personal data.

For your information, data subjects can, at any time, but always considering the actual situation and the respective legal limits, exercise the following rights with any **Data Controller**:

- a) **Submit a request for access to this information**, the data subject has the right to obtain confirmation of whether their data is being processed or not, and if so, the data subject should have access to their personal data and the information provided by law.
- b) **Submit a request for rectification of the data obtained concerning the data subject**, in case this data is inaccurate or incomplete;
- c) **Submit a request for erasure of their personal data**, without undue delay, whenever one of the following reasons applies:
 - i. Personal data is no longer necessary for the purposes for which it was collected or processed;
 - ii. Personal data is no longer necessary for the purposes for which it was collected or processed;
 - iii. Withdrawal of consent by the data subject to the processing of the data (in cases where the processing is based on consent) and absence of another reason for the mentioned processing.

- d) **Submit a request to limit the purposes of processing their personal data**, if one of the following situations occurs:
- i. Dispute of the accuracy of personal data for a period sufficient to allow verification of its accuracy;
 - ii. The processing of data is legitimate and the data subject opposes the erasure of personal data and requests, instead, the limitation of data usage;
 - iii. We no longer need your personal data for processing purposes, but this data is necessary for the data subject to establish, exercise, or defend a right in the context of legal proceedings;
 - iv. When the data subject has objected to the processing, until it is perfectly clear that all the legitimate reasons of the data controller prevail over those of the data subject.
- e) **Object to the processing of their personal data**, in cases where the processing of the data is carried out for the legitimate interests pursued by us, or when the data is processed for direct marketing purposes.

If the data subject wishes to exercise any of the aforementioned rights, they should contact us using the contact information provided above. We would like to emphasize that it may be necessary to request specific information in order to confirm the data subject's identity and ensure their legitimacy to exercise these rights, as well as to ensure that we do not provide data to third parties who are not entitled to receive it.

All requests are responded to within one month, except if the complexity of the request presented is particularly complicated, or if the data subject has presented multiple requests. Notwithstanding the foregoing, we will always keep the data subject informed in case the response time is extended.

Exercising your rights does not involve the payment of any fee. However, if your request is unfounded, repetitive, or excessive, we may charge a reasonable fee or, alternatively, refuse your request.

We would like to remind you that you have the right to, at any time, submit a complaint to the National Data Protection Commission (CNPd), whose contact information is available at www.cnpd.pt. We would also like to request that you give us the opportunity to respond to your questions before contacting the CNPD

10. UPDATES AND LINKS TO THIRD-PARTY WEBSITES

This privacy policy may be updated at any time, with the latest version being made available on this page.

This website may include links to third-party websites, plugins, and applications. Clicking on these links or activating these links may allow third parties to collect or share your data, which is not controlled by us and cannot be attributed to us. Therefore, we recommend that you read the privacy policy of all websites you visit in addition to this website.

11. COOKIES

This website uses cookies. When you visit the website, we may install small pieces of information on your computer, called "cookies". Cookies are stored by the browser on the hard drive.

In the context of this website, we distinguish two types of cookies:

- a) **Technical cookies**, i.e., cookies that are necessary for the proper functioning of this website;
- b) **Performance and tracking cookies**, e.g., cookies that collect information about the user and improve performance but are not necessary for proper operation.

In general terms, cookies help us in various ways: we use cookies to better organize the website or information about our products and to have this information tailored to the user's interests or preferences. Cookies allow us to know who has visited these pages and which content has been visited, evaluate the frequency of visits to certain pages, determine the favorite areas of the website, and generally direct their use.

The user has the option to manage cookies by selecting the corresponding option in their browser. However, we would like to inform you that, if cookies are disabled or refused, some parts of this website may become inaccessible or not operate correctly.