



Customer Privacy Policy

1. NOS' Commitment

Personal data protection and privacy constitutes a fundamental commitment by all the NOS, SGPS Group companies to customers and users ("Customers") of its products and services.

NOS recommends that this document, the company's internet site page dedicated to privacy and personal data protection, and the Terms and Conditions for NOS products and services (updates of which are available at nos.pt) be read in full.

2. The responsible person for data processing and the data protection officer

The responsible person for the collection and processing of customers' personal data will be the company of the NOS group which provides the service or supplies the product and who in this context decides what data is collected, the means of processing and the uses to which the data are put.

NOS also has a Data Protection Officer (DPO), who (i) monitors compliance of data processing with applicable standards, (ii) is a point of contact with the customer or user in order to clarify issues relating to the processing of their data by NOS, (iii) cooperates with the control authority, (iv) provides information and guidance to the person responsible for processing or the sub-contractor about their obligations as far as data privacy and protection are concerned.

You can contact the DPO through the following addresses: NOS – Privacy - Data Protection Officer (DPO) - Rua Actor António Silva, 9, Campo Grande, 1600-404 Lisboa or by email dpo.privacidade@nos.pt.

3. Personal data, owners of personal data and categories of personal data

What are personal data?

Personal data are any information, of any nature and on any medium (e.g. sound or image), concerning an identified or identifiable individual.

A person considered to be identifiable is one who can be identified directly or indirectly, for example by their name, identification number, location data, an electronic identifier or other elements that allow the individual to be identified.

Who are the owners of personal data?

The Customer or User, individual, to whom the data relate and who makes use of the services or products of NOS. The Customer will be the person who signs the contract with NOS or with one of the companies of NOS Group and the User is the person who uses the services or products of NOS or companies of the NOS Group, but who may not be the same person as the Customer. For example:

- In the business segment, the contract with NOS is in the name of the company but the Users are customers and employees of this company.
- In the household segment, a Customer may acquire various mobile services or a TV service for the whole household, so that each of the individuals in the household who enjoy the use of the service or products will be considered a users.

What categories of personal data are we dealing with?

Identification Data	Examples
Identification and Contacts	Civil or tax identification numbers, payment data, invoicing/installation address, phone contact or e mail address.
Other identification data	birth date, gender or information about the family unit.
Service	Products and services acquired or subscribed to.
Profile and interests	Interest in NOS products and services, films, music, football club, social networks, or other preferences and interests.

Dados de utilização de serviço	Examples
Service use information (traffic)	Destination and origin numbers of calls made, date and time of communication, length of call, IP address, mac address and data concerning product and service rates.
Localisation	Geographical location of the customer or device at a specific time or during the use of the services.
Content	Information included in customer communications, such as for example voice, SMS/ MMS or complete URLs of data sessions.
User profile	Data that result from the viewing of a TV product, or from the kind of calls made.

4. Basis, Purpose and Duration of Personal Data Processing

On what basis can NOS process your personal data?

Agreement: when your express and prior agreement has been obtained – in writing, orally or by validation of an option – and if this agreement was given freely, on an informed basis, specifically and clearly. Examples are, your agreement for NOS to analyze the use of services and consumption profiles and make recommendations or send marketing messages, to use your identification data or use of services to send NOS Group marketing messages, your agreement so that we can use recorded calls that you make for our call centres with the goal of improving our customer service quality; or

Contract execution and pre-contractual diligence (“CE”): when personal data treatment is necessary for the signature, execution and management of a contract with NOS, such as for example for the preparation of a proposal of services, or information about the address for installation, for providing a communications service, for managing contracts, information and requests, for the management of invoicing, debt recovery and payments; or

Compliance with legal obligations (“CLO”): when personal data processing is necessary to comply with a legal obligation which applies to NOS, such as for example communicating identification or traffic data to the police, legal, tax or regulatory entities, or location data to provide emergency services; or

Legitimate interest (“LI”): when personal data treatment is of legitimate interest to NOS or third parties, such as for example the treatment of data for improving quality of service, detection of fraud and revenue protection, the communication of data to other operators for the purpose of interconnection or roaming, and when our reasons for using them should prevail over your data protection rights.

Agreement of minors

In the case of personal data treatment of minors which may be subject to prior consent, NOS will insist that agreement is given by those who hold parental responsibility for the minor, specifically for the provision of services, at a distance, by electronic means.

For what purposes and for how long does NOS process your personal data?

Your personal data are used by NOS only for the time necessary to achieve the purpose defined or, depending on what is applicable, until you exercise your right of objection, the right to be forgotten or you withdraw your agreement. Following the respective retention period, NOS will delete or make the data anonymous, whenever this data should not be retained for the specific purpose that may continue to exist.

Purposes	Examples of purposes (not exhaustive)
Marketing and Sales	Marketing or sale of new products and services Analysis of consumer profiles Adaptation and development of new products or services.
Customer Management and Service Provision	Management of contacts, information or requests Management of installation, activation or disconnections Management of complaints or breakdowns Management of invoicing debt recovery and payments. Consumption analysis Recording of calls to prove commercial transactions and communications as part of a contractual relationship Recording of calls to monitor quality service.
Accounting, Tax and Administrative Management	Accounting, invoicing Management of commissions Tax information, including the sending of information to the taxation authorities.
Litigation Management	Legal and out of court debt collection Management of other conflicts.
Detection of fraud, protection of revenue and auditing	Detection of fraud and illicit practices Protection and control of revenues Credit risk management Internal audit and investigation.
Network and systems management	Support and improvement of networks and applications that support service Service monitoring, improvement and support.
Operator management	Interconnection and roaming management.
Compliance with legal obligations	Location of calls for emergency services Judicial requests to intercept communications Investigation, detection and suppression of serious crimes Answers to judicial, regulatory and supervision entities.
Information security control	Management of accesses, logs Back up management Management of security incidents.
Physical security control	Video surveillance in premises, in particular stores.

For what lengths of time will personal data be used and kept?

NOS uses and keeps your personal data according to the purposes for which they are used.

There are situations in which the law obliges data to be used and kept for a minimum period of time, namely: for one year, localisation and traffic data for investigations, detection and suppression of serious crimes, or 10 years for data necessary in relation to information for the tax authorities for fiscal or accounting purposes.

But, in situations where no specific legal obligation exists, the data will be used only for the period necessary to achieve the purposes that were the reason for their collection and preservation and, at all times in compliance with the law, and the guidelines and decisions of the CNPD. Thus:

NOS will process and maintain your personal data for the period during which a contractual relationship is maintained with you.

However, data traffic that are needed for invoicing, for example, destination and origin numbers of calls made, date and time of communication, duration of call, IP address and mac address, will only be kept for a maximum period of 6 months starting from the date on which the data were generated.

In relation to calls recorded, and according to the terms of the standard authorization, NOS will keep the recordings in order to provide proof of commercial transactions and communications as part of the contractual relationship for the time that the contract agreed between the parties is in force, plus the prescription and limitation period of 6 months.

NOS can also record and keep calls with the goal of monitoring service quality and based on customer agreement, but for this purpose the calls will only be kept for a maximum period of 30 days.

In relation to video surveillance in its premises and stores, NOS will only keep recordings of images and related personal data for a maximum period of 30 days.

NOS will keep other personal data for periods in excess of the duration of the contractual relationship, either based on your agreement, or to ensure rights or obligations related to the contract, or because it has legitimate interests that support so doing, but always for the period of time that is strictly necessary to achieve the respective purposes and in accordance with the guidelines and decisions of the CNPD.

Examples are: contact for purposes of marketing and sales, the preservation of data as part of invoice complaint processes, exercising guarantee rights, taking away equipment after disconnecting the customer or legal proceedings, during the time in which these are pending.

5. The means and the timing of personal data collection

When and how do we collect your personal data?

We collect personal data based on your agreement when you acquire NOS products and services, when you download or use NOS products, services and applications or when you take part in market surveys.

The collection can be done orally, in writing or via the NOS website.

But your personal information can also be collected from sources that are accessible to the public or other sources. So that you can better understand this indirect form of collection, we point out the following cases:

- **Data Base Shared between electronic communications operators for the purposes of contracting:**

If you have invoices due of a value in excess of 20% of the minimum national wage, your data may be included in a debtors list. But before including your data on the list, NOS will notify you to pay off the sum owing within 5 days, or to prove that the debt does not exist or is not payable by you.

Also if you have an agreement for the repayment of the debt, if you justify the fact that invoices have not been paid because of contractual non-compliance by the operator, or if you have contested the sum invoiced or prove that you do not owe the amount that is being recovered, then you cannot be part of this data base.

This list is shared among participating communications operators and NOS may make recourse to this list before making a decision about establishing service contracts with customers.

• **Other relevant information about credit risk or about contact identification and data, for the management of bad debts, detection of fraud and revenue protection.**

NOS can collect personal data from private entities that keep relevant information about the credit of owners of personal data, as long as these data bases respect the applicable rules for data protection.

NOS can also access, collect or confirm personal data held on government and private entity sites, in particular, to confirm the accuracy of your identification and contact data.

6. Rights of the personal data owner

What are your rights?

Right of Access

The right to obtain confirmation of what personal data of yours is being used and information about this data, such as for example what the purposes of this use are, the lengths of time they are being kept, among others.

The right to see/hear or get a copy of, for example of invoices, written agreements or calls in which you have been involved and which are recorded.

Right to Rectification

The right to request rectification of your personal data which are inexact or to request that partial personal data be completed, such as for example address, tax number, e mail, phone contacts etc.

Right to delete data or “the right to be forgotten”

The right to get your personal data deleted, as long as there are no valid reasons for them to be kept, such as for example cases in which NOS has to keep data in order to comply with a legal obligation to preserve data for the investigation, detection and suppression of crimes or because there happens to be legal proceedings underway.

Right to transferability

The right to receive data that you supplied to us in commonly used and automatically legible digital format or to request the direct transmission of your data to another entity that will now be responsible for your personal data, such as, for example, receiving your invoices or transferring your contacts to the new responsible entity, but in this case only if it is technically possible.

Right to withdraw Agreement or the right to objection

The right to object or withdraw your agreement, at any time in relation to data treatment, such as the use of data for marketing purposes, as long as there are no legitimate interests that take precedence over your interests, such as for example defense of the right to legal proceedings.

Right of Restriction

The right to request the restriction of use of your personal data, by means of: (i) suspending use or (ii) limiting the scope of use to certain categories of data and purposes of treatment.

Profile and Automated Decisions

NOS can trace customer profiles, based on for example their preferences, personal interests, use of service, location, etc., in particular to provide services, increase quality and improve product and service experience, prepare appropriate marketing communications etc., as long as this processing is necessary for the signing and execution of the contract between the owner and NOS or based on the agreement of the owner.

When the use of personal data, including its use for the definition of profiles, is wholly automatic (without human intervention) and may have an impact on your legal status or affect it significantly, you will have the right to not be subject to any decision that is based on this automatic treatment, notwithstanding those exceptions set out in the law, and will have the right to expect NOS to adopt adequate measures to protect your rights, liberties and legitimate interests, including the right to human intervention in the decisions taken by NOS, the right to make your point of view known and to contest the decision taken on the basis of the automated treatment of personal data.

Right to complain

The right to make a complaint to the control authority (CNPD), in addition to the company and to the DPO.

Right to keep your phone number confidential

The right to make your telephone number anonymous for calls, connections or on a permanent basis, except when it concerns calls for which a right has been exercised to not receive nuisance calls, a situation in which this confidentiality will be cancelled.

Right for the caller's number to be confidential

The right to make the number calling you confidential.

Right not to receive nuisance calls that affect your private life or peace of mind of your family

The right to request NOS in writing to identify the origin of unidentified nuisance calls that affect family life adversely or the intimacy of private life. Under these circumstances, NOS will have to request the opinion of the CNPD and, if authorized, the cancellation will take place for a maximum period of 30 (thirty) days.

NOS will subsequently inform the caller, by playing an automatic recording before the call is established, that from that moment and for the time period specified, the phone number of the caller will cease to be confidential on calls made to the subscriber who has asked for the number to be identified.

Right to reject confidential calls

The right to reject incoming calls when the calling number is anonymous.

Right to be part of public lists

The right to decide whether to include your personal data in a list accessible to the public – a NOS list, one of a universal service provider or of a third party.

How can you exercise your rights?

Exercising your rights is free of charge, except if it concerns a request that is plainly unfounded or excessive, a situation in which a reasonable rate may be charged, taking into account the costs involved.

Information should be supplied in writing but, on request, can be given orally. In this case, NOS must verify your identity by other means that are not oral.

A response to requests must be provided within a maximum period of 30 days, unless the request is especially complex.

Exercising these rights should be done via the following addresses:

NOS Comunicações, S.A.

Post: NOS – Privacy, Rua Actor António Silva, n.º 9, Campo Grande, 1600-404 Lisboa

Mail: cliente.privacidade@nos.pt

Telephone: 800 109 300

NOS Madeira Comunicações, S.A.

Post: NOS Madeira – Privacy, Rua Estados Unidos da América, N.º 51, 9000-090 Funchal

Mail: cliente.privacidade@nosmadeira.pt

Telephone: 800 109 300

NOS Açores Comunicações, S.A.

Post: NOS Açores – Privacy, Avenida Antero de Quental n.º 9 C-1º Ponta Delgada, 9500-160 Ponta Delgada

Mail: cliente.privacidade@nos-azores.pt

Telephone: 800 109 300

7. Personal Data Transmission

Under what circumstances can your personal data be transmitted to other entities, sub-contractors or third parties?

Your data can be transmitted to sub-contractors so that they can use them for and in the name of NOS. In this case, NOS will take the necessary contractual measures to ensure that subcontractors respect and protect the owner's personal data.

The data can also be transmitted to third parties – entities which are distinct from NOS or subcontractors – such as for example companies within the NOS group, companies with which NOS has built partnerships, where the owner has given his permission – or entities to which data have been communicated due to legal requirements, such as the fiscal authorities.

Under what circumstances can NOS transfer your data to a third party?

NOS may have to transfer your personal data to a third party country outside the European Union and which is not part of the list of countries that the EU considers to have adequate levels of protection of personal data. Under these circumstances, NOS will ensure that any data transfers are done in strict compliance with applicable legal regulations.

8. Responsibility for services and websites of NOS and of third parties

Concerning the use and treatment of personal data on NOS websites, please make sure that you look at the rules on the use of cookies on the respective websites.

Websites, products or applications of NOS can contain links to third party websites, products and services which have no connection to NOS or which are not covered by this Privacy Policy.

The collection or treatment of personal data requested by these third parties is their sole responsibility, and NOS cannot be held responsible under any circumstances for the content, the accuracy, veracity or legitimacy of these websites or for the misuse of the data collected or treated through them.

We alert customers and users of NOS to this situation and to the need, before using these websites, products or applications, to read and accept the rules defined by these third parties in relation to the treatment of personal data.

9. Procedural measures and security techniques

How does NOS protect your personal information?

NOS has implemented adequate, necessary and sufficient logistical, physical, organizational and security measures to protect your personal data against destruction, loss, alteration, diffusion, unauthorized access or any other form of illicit or accidental treatment. NOS has implemented:

- logical security measures and requirement, such as the use of firewalls and systems for detecting intrusion into its systems, the existence of a rigorous policy in relation to accesses to systems and information, and a register of actions taken by NOS staff on personal data of customers and users (logging)
- physical security measures, among which can be highlighted strict control over access to NOS physical installations by staff, partners and visitors, as well as access to the essential NOS technological infrastructure, which is highly restricted and continuously monitored
- means for protecting data from design ("privacy by design") using technical means such as masking, encryption, aliasing and rendering personal data anonymous, and also a range of preventive measures that encourage privacy ("privacy by default")
- Mechanisms for scrutiny, auditing and control, in order to ensure compliance with privacy and security policies
- A program of information and training for staff and partners of NOS
- Access rules for Customers and Users to specific products and services, such as for example the introduction of a password, in order to strengthen security and control procedures.

However, NOS advises caution in revealing your personal data and in exchanging this data on the internet, acts which are entirely the responsibility of the customer, in view of the fact that these data are not entirely protected against possible abuse, as well as adopting complementary security measures, including the maintenance of devices (PCs, tablets or mobile phones) and programs that are properly updated and configured with firewalls and protection against malicious software (e.g., antivirus), not to navigate on sites of questionable reputation or for which you do not have due guarantees of authenticity, the physical protection of your devices and to avoid putting access credentials on computers that can be accessed by the public (e.g., cybercafés, hotels etc.) and the use of passwords that are strong and differentiated according to each service or website.

With special reference to your children or adolescents, take special care with privacy on the internet, social networks and games, mobile phones and other devices. Read carefully and guide them on the privacy policies of suppliers of these services, make them aware of the ways of circulating information on the internet and of cookies, encourage your children to only share personal information with people or companies that they know and not to navigate on sites of questionable reputation or on those which do not have due guarantees of authenticity, help them to create their online profile and to use strong passwords and ones that are differentiated according to each service or website, to lock their computers and to create a pin for their mobile phone.