

PRIVACY POLICY

InovCluster is a private non-profit association, legally constituted on 29 May 2009, specially created to coordinate, streamline and manage the partnership in order to implement the Strategic Vision and Action Programme associated with the Centre's Agroindustrial Cluster Collective Efficiency Strategy (EEC), recognized by the Portuguese government in 2009.

Inovcluster's aim is to build a consultation platform that involves and mobilizes the main players in the agro-industrial sector in the processes of innovation, R&TD, knowledge transfer, advanced training, development, production and commercialization of products and services, marketing and internationalization.

The association's objectives are as follows:

- a) Analyzing and monitoring the state of the art in the agro-industrial sector;
- b) To promote and organize national structuring and complementary projects in the agro-industrial sector;
- c) Organizing and promoting applications for national and international incentive systems;
- d) Promote national applications to EU Framework Programmes;
- e) To coordinate initiatives and projects in the agro-industrial sector;
- f) Promote national representation at relevant international events;
- g) Publicising and disseminating the results of projects in the agro-industrial sector;
- h) Promote advanced training and the transfer of knowledge between the National Academic and Scientific System and the business world;
- i) To help create the conditions for developing, attracting and retaining highly qualified human resources;
- j) To encourage companies to adopt the most relevant certifications;
- k) Create evaluation mechanisms that guarantee quality projects in line with national and international policy priorities.

The operationalization of InovCluster is ensured through the dynamization of a set of transversal activities, which are divided into 5 types: Current Operation, Cluster Evaluation, Internal and Member Training, Project Dynamization and Service Provision. Also included are the activities carried out under each of the Intervention Units: +Cooperation, +Financing +Incentives, +Internationalization, +Entrepreneurship, +IDT +Innovation and +Communication. Legal compliance and good practice in the management and processing of personal data and information security are integral components of Inovcluster's services. Please read this Privacy Policy carefully to understand how we collect and process your personal data.

1. SCOPE

Within the scope of the services requested of us, and the activities that constitute the day-to-day running of the Association, we collect and process the personal data of Members, partners, clients, researchers, official bodies, consultants and trainers, trainees, both of Portuguese nationality and from abroad.

2. PERSONAL DATA CONTROLLER

Inovcluster is the association responsible for processing your personal data:
Address: Zona Industrial de Castelo Branco, Rua A; 6000-459 Castelo Branco,
PORTUGAL
Email: geral@inovcluster.pt; Tel.: +351 272 001 160

3. THE PURPOSES FOR WHICH PERSONAL DATA IS PROCESSED

3.1.1. For what purpose?

To contact you regarding the express need to fulfil the Association's purpose, national and international projects of interest to the association and the agro-industry sector.

Through the means of communication that are possible and available between the parties, namely by email, telephone, surveys of members, the sector or the general public, or otherwise for clarification and/or collection of information necessary for the implementation of projects and of strategic interest to the national agro-industrial sector.

3.1.2. What personal data do we process for this purpose?

For this purpose, we may process your name, your business data, such as contact details, logo, description of activity on the website www.inovcluster.pt on social networks (LinkedIn and Facebook) and through institutional catalogues and those promoted by Inovcluster.

With prior authorisation provided by entities participating in programmes/projects and/or within the scope of contracted services, subject to confidentiality and secrecy.

3.1.3. Who do we share your personal data with?

We share it with trusted organisations, project partners and/or tax and legal requirements. Trusted entities are understood to be those entities with which Inovcluster has contracts to handle requirements such as the association's accounting, insurance, banks, government entities and the Managing Authority.

4. OTHER COLLECTION METHODS

4.1. Use of mailing lists

Inovcluster's associative dynamics make it necessary to listen to its Associates, partners, clients, researchers, official entities, consultants and trainers, trainees, both of Portuguese and foreign nationality, for which purpose it creates "mailing lists" whose personal data has been previously consented to for the purpose in question.

4.2. Social networks

Our websites may contain various social sharing features, such as Facebook or LinkedIn link buttons, which you can use to share information from our websites via the social networks of your choice.

Inovcluster, as part of its associative objective and the enhancement of the sector, may invite the participation of Associates, partners, clients, researchers, official entities, consultants and trainers, trainees, whether of Portuguese or foreign nationality in surveys aimed at the realisation of projects or of interest to the sector.

Please note that we are not responsible for the collection, processing and sharing policies and practices (including data security practices) of other entities such as Facebook, Apple, Twitter, Google, Microsoft, or any other application developer or provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including the personal data they may disclose to other entities through or in connection with our social media features.

5. WITH WHOM WE SHARE PERSONAL DATA

In addition to the sharing of personal data indicated for each purpose, we may also subcontract third parties to carry out certain data processing on our behalf, such as the provision of information technologies and their infrastructures, security services (including identity and access management), as well as legal, financial/accounting and similar services.

Where such third parties have access to personal data in order to carry out such data processing, we have adopted technical, organisational and contractual measures to ensure that your personal data is processed exclusively for the purposes mentioned here.

Only if we are required to do so by law may your personal data be made available to supervisory agencies, tax authorities, investigative agencies and management authorities.

Data stored on the company's internal is only accessed by duly authorized trusted entities and within the scope of the development of the service provision.

6. DURATION OF PERSONAL DATA RETENTION

We only retain your personal data for as long as necessary to fulfil the purpose for which it was collected, to respond to your needs or to comply with our legal obligations.

To determine the period for which we keep your data, we use the criteria set out below. If several criteria apply at the same time, we will store your personal data in accordance with the criterion that implies that we will store your Personal Data for the longest period of time.

- a) When you purchase services, we will keep your personal data for the duration of our relationship, including any claims that may arise, as well as for a period of two years after its termination, without prejudice to the fulfilment of the legal obligations of the data controller;
- b) For tax purposes of the commercial transaction, we will keep your personal data for the period required by law of 10 years.
- c) When you contact us with questions, we will keep your personal data for the period of time necessary to resolve your question;
- d) When you create a customer account, i.e., when you register on our website, we will keep your data until you ask us to delete it or after a period of inactivity of two years;
- e) When you have consented to the sending of direct marketing, we will keep your personal data until you unsubscribe or ask us to delete it;
- f) With regard to data collected during the recruitment process, for a maximum period of 1 year from the end of the process;
- g) The period of time provided for in the applicable legislation; or
- h) Until the specific purpose applicable to certain data ceases to exist.

In any of the aforementioned situations, if there are legal or administrative offence proceedings pending, the data will be kept for the duration of the proceedings and for up to six months after the final judgement has been handed down.

We may also retain some of your personal data to the extent that it is necessary for us to fulfil our legal obligations, as well as to manage or enforce our rights, namely through recourse to the courts.

Once the above retention periods have expired, the Personal Data will be securely deleted and/or erased.

7. HOW WE PROTECT YOUR PERSONAL DATA

We treat your personal data as strictly confidential and Inovcluster has taken appropriate technical and organisational security measures to protect it against loss or unlawful processing. Unfortunately, no data transmission or retention system is 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you suspect that the security of any

account you have with us has been compromised), please report the problem to us immediately by contacting us via the appropriate means of communication, telephone, letter, email geral@inovcluster.pt or otherwise.

8. WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

In accordance with the applicable legislation, Inovcluster undertakes to maintain the secrecy and confidentiality of your personal data and to guarantee the exercise of your rights:

- a) Right to be informed: our customers have the right to clear, transparent and understandable information about how Inovcluster uses their Personal Data. As a result of this right, the current Privacy Policy has been drawn up.
 - b) Right of access: you can access your personal data that we process and store. In these cases, Inovcluster will provide you with a copy of the personal data being processed. In addition, when you request it by electronic means, the information will be provided in a commonly used electronic format.
 - c) Right to rectification: you have the right to rectify your personal data if it is incorrect, out of date or if you wish to complete it. In these cases, you must submit this request to us in writing."
 - d) Right to erasure/right to be forgotten: you can ask us to erase your personal data. You should consider that this is not a right as there may be legal grounds or other duly identified interests for retaining your personal data.
 - e) Right to object, including to direct marketing: you can unsubscribe or opt out of our direct marketing communications at any time. Just let us know by email to geral@inovcluster.pt.
 - f) Right to withdraw your consent to data processing at any time: you may withdraw your consent to data processing when such processing is based on your consent. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to its withdrawal.
 - g) Right to lodge a complaint with the CNPD: if you consider that Inovcluster's processing of your personal data violates applicable data protection legislation, you may lodge a complaint with the National Data Protection Commission ("CNPD"). Please do not hesitate to contact us before lodging any complaint with the CNPD.
 - h) Right to data portability: you have the right to move, copy or transfer your data from our database to another.
 - i) Right to restriction of processing: you have the right to request the restriction of the processing of your data in the following situations: if you dispute the accuracy of the data, if the processing is unlawful and you do not want to delete your data, but only limit it, if the data is no longer necessary for Inovcluster.
- If you believe that any of the above rights are in question, you should send a written communication to the above address or an e-mail to the e-mail address geral@inovcluster.pt, which you can also use if you wish to ask us any questions regarding this Privacy Policy.

9. Guarantees

The data subject guarantees that the Personal Data communicated to Inovcluster is correct and accurate and undertakes to notify any alteration or modification to it and assumes sole responsibility for losses and damages caused by the erroneous, inaccurate or incomplete communication of the data.

The data subject is expressly warned that by disclosing Personal Data on Inovcluster's public media such as Facebook, LinkedIn this information may be seen and used by third parties.

Inovcluster does not read any personal communications published on its clients' own websites.