

PRIVACY POLICY

This Health Unit, part of Luz Saúde Group (hereinafter "**Luz Saúde**"), within the scope of its activity, treats Personal Data relating to either a) its employees (in particular, relating to human resources management, occupational medicine and the recruitment process), or (b) to their clients, in the provision of health care services (preventive medicine, medical diagnosis, care services or medical treatment and management of health services). This Health Unit acts as Responsible for the Processing of Personal Data of said data subjects, except for the situations identified in this Policy.

In this context, this Health Unit intends to ensure that the processing of such data by its employees complies with the applicable legislation, namely the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation - "**GDPR**").

For this purpose, this Health Unit has approved this document, which aims to encompass the following privacy policy (hereinafter "**Privacy Policy**"), establishing the main rules that must be observed by the different areas of this Luz Saúde Health Unit with respect to personal data processing.

The collection and processing of personal data provided to the Health Unit, as well as the exercise of the rights of its holders with respect to these data, are governed by this Privacy Policy, by the internal regulations and by the other instruments used by this Health Unit

I

INTRODUCTION

1. Key-definitions ^{1,2}

- (a) "**Anonymisation**": means the processing of personal data by irreversibly removing the details or information regarding a data subject in a manner that the personal data can no longer be attributed to a specific data subject;
- (b) "**Supervisory Authority**": means an independent public authority which is established by a Member State, and it is in charge of the supervision of GDPR implementation, in order to defend the rights and freedoms of natural person regarding the data processing and to enable the free movement of such data in the European Union. In Portugal, the supervisory authority shall be Comissão Nacional de Proteção de Dados ("**CNPD**");

¹ In this document, whenever capitalized, and unless otherwise clearly stated in the context, the terms and expressions indicated shall have the meanings set forth below.

² Except as otherwise provided in the context, any reference in the Privacy Policy to a legal provision shall include any changes to which it has been and / or will be subject.

- (c) **“Special Categories of Personal Data”**: means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;
- (d) **“Consent of the data subject”**: means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she signifies agreement to the processing of personal data relating to him or her
- (e) **“Personal Data”**: means any information, regardless its format, relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person
- (f) **“Data concerning Health”**: means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her past, present and future health status. This includes, e.g., a) any number, symbol or particular assigned to a natural person to uniquely identify the natural person for health purposes; information derived from the testing or examination of a body part or bodily substance, including from genetic data and biological samples; b) any information on, for example, a disease, disability, disease risk, medical history, clinical treatment or the physiological or biomedical state of the data subject independent of its source, for example from a physician or other health professional, a hospital, a medical device or an in vitro diagnostic test;
- (g) **“Profiling”**: means any form of automated processing of Personal Data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;
- (h) **“Data Protection Officer” – “DPO”**: means the person designated to ensure, within an organization, the compliance of the Personal Data processing with the GDPR, ensuring the efficient communication with the data subjects and the cooperation with the relevant supervisory authorities, and connecting with the business units within the organization;

- (i) **“Data Protection Legislation”**: the GDPR, the Law no. 67/98, of 26 October 1998 (Data Protection Law) in everything that does not contradict the GDPR and until the approval of the GDPR execution Law in Portugal, Law no. 27/2002, of 8 November 2002 (which approved a new wording for Law no. 48/90, of 24 August 1990, Health Law), the Law no. 12/2005, of 26 January 2005, and the Law no. 41/2004, of 18 August (as amended by Law no. 46/2012, of 29 of August 2012);
- (j) **“Privacy Policy”**: means the present document, which aims to enact the privacy policy of this Luz Saúde Health Unit, establishing the main rules to be observed by the different areas regarding the processing of Personal Data;
- (k) **“Pseudonymisation”**: means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person;
- (l) **“GDPR”**: means the Regulation (EU) 2016/679 of the European Parliament and Council, of 27 April 2016 – General Data Protection Regulation;
- (m) **“Controller”**: means the Hospital da Luz Lisboa, which determines the purposes and means of the processing of Personal Data;
- (n) **“Processor”**: means a natural or legal person, which processes Personal Data on behalf of the controller;
- (o) **“Third Party”**: means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, Processor and persons who, under the direct authority of the controller or processor, are authorised to process Personal Data;
- (p) **“Data Subject”** or **“Client”**: means a natural person identified or identifiable, whose Personal Data are processed by this Health Unit or other Controller;
- (q) **“International transfer of data”**: transfers of Personal Data that are or will be processed after transfer to a third country (not located in the European Union) or to an international organization, and the transfer may occur between two or more controllers or between controllers and processors;
- (r) **“Personal Data Processing”**: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available,

alignment or combination, restriction, erasure or destruction;

- (s) **“Personal Data Breach”**: means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

2. To what this Privacy Policy refers to?

The Privacy Policy defines the rules regarding the processing of Personal Data that the Health Unit and its employees must obey, in compliance with the provisions of the Personal Data Protection Legislation.

2.1. This Health Unit may approve certain specific policies applicable to the processing of certain Personal Data made by its areas, which, after being disclosed, will be an integral part of this Privacy Policy.

2.2. The processing of personal data collected through the Hospital da Luz website and app will be governed by an autonomous Privacy Policy available on the relevant platform.

2.3. The rules set forth by the Privacy Policy will apply to all employees of the Health Unit and to the service providers of this Luz Saúde Health Unit, also, collectively referred to as "employees".

2.4. Each Client shall be provided with information on the identity and contact details of the controller, the DPO contacts, the purposes of the processing and associated legal bases, the categories of personal data processed, the recipients or categories of recipients of the data, and conditions of exercise of the rights as data subject, among other information that may be required.

II

HOW YOUR PERSONAL DATA IS GOING TO BE PROCESSED?

1. Principals regarding Personal Data Processing

The Processing of Personal Data carried out by this Health Unit shall be carried out according to the following principles:

- 1) Lawfulness, fairness and transparency;
- 2) Purpose limitation;
- 3) Adequacy, relevance and proportionality (minimization of data);
- 4) Accuracy;
- 5) Limitation of retention.

1) Lawfulness, fairness and transparency;

- (i) The Health Unit shall inform the Data Subject of the processing of data concerning him or her, informing, in particular, its grounds of legitimacy, purposes, categories of data processed, period of retention of the data and other information concerning the Processing of Personal Data.
- (ii) The Processing of Personal Data by Processors shall be governed by a contract or legal act that binds the Processor to the Controller and that sets forth, in particular, obligations of confidentiality and security of processing, and that the Processor only acts upon instructions from the Controller, being also responsible for the compliance with the obligations referred to in article 28 of the GDPR.

2) Purpose Limitation

- (i) The Personal Data processed by the Health Unit must be collected for specific, explicit and legitimate purposes and it shall not be further processed in a manner incompatible with these purposes.
- (ii) The Health Unit will carry out operations for the processing of Personal Data of its Clients, namely, for the following purposes:
 - i. provision of health care, including preventive medicine, medical and therapeutic diagnosis and management of health services, including billing operations and procedures to third parties financially responsible for payment of care services;
 - ii. audits and continuous improvement of services provided, accreditation of health units or certification of their services, as well as for the evaluation and measurement of service levels of the Health Unit;
 - iii. Client relationship management, including management of contact channels, online, on-site and telephone (including telephone, SMS, e-mail or mail communication, including regarding scheduling of appointments and complementary diagnostic or billing);
 - iv. sending response to complaints and suggestions;
 - v. sending informative and marketing communications, with their prior consent;
 - vi. carrying out client satisfaction assessment surveys, with their prior consent;
 - vii. issuance and sending of electronic invoices, upon their acceptance;
 - viii. conducting studies and clinical trials;

- ix. security and video surveillance.

3) Adequacy, relevance and proportionality

The Personal Data shall be adequate, relevant and limited to what is necessary for the purposes for which it was collected and subsequently processed. The Health Unit shall only process Personal Data if it is necessary for the continuation of its activity, compliance with legal obligations, for the performance of a contract or contracts in which the Data Subject is a party or prior negotiation before entering into a contract or statement of will to negotiate made at his or her request. For certain purposes, the Health Unit may only process the Personal Data of its Clients if it obtains its prior and express consent. Such will be the case, for example, of the processing for sending informative and marketing communications that are considered relevant for the promotion of their health and for the provision of a health service of excellence, through the different communication channels, namely SMS , email, or push notifications³.

4) Accuracy

The Personal Data must be accurate and, if necessary, updated, with this Health Unit taking appropriate measures to ensure that inaccurate or incomplete data is erased or rectified without delay, taking into account the purposes for which it was collected or for which it was subsequently processed.

5) Limitation of Retention

- (i) The Personal Data collected is processed in strict compliance with the applicable legislation. Such data shall be kept in a format which allows the data subjects to be identified only for the period necessary for the purposes for which they are processed.
- (ii) The period of time during which data is stored and retained varies according to the purpose for which the information is used. There are, however, legal requirements that require us to keep the data for a certain period of time. We also take as reference the various deliberations of data protection supervisory authorities, in particular the Comissão Nacional de Protecção de Dados, to determine the appropriate retention period.
- (iii) To that extent and in particular:

³ In case you have enabled this option in your electronic mobile device.

- i. the data relating to your health shall be kept in accordance with the legislation applicable to the archiving of hospital documents;
- ii. the data resulting from the satisfaction surveys shall be kept for a period of 6 months, after which they shall be anonymised;
- iii. billing data (including invoices issued and received by electronic means) shall be kept for a period of 10 years to comply with legal obligations in tax matters;
- iv. the data used for the purpose of sending informative and marketing communications shall be kept as long as you maintain interest in receiving such communications and do not withdraw your consent; and
- v. other administrative data (including identification and contact details) shall be kept only for the period necessary for the purposes for which it is processed, provided that it is not necessary to maintain them for the purpose of fulfilling the legal obligations of the Controller.

2. Based in what grounds may we process your personal data?

- 2.1. The Health Unit will only treat the Personal Data when it is duly authorized to do so.
- 2.2. The processing of Personal Data may be based on:
 - (i) the consent of the data subject;
 - (ii) the performance of a contract in which the data subject is a party;
 - (iii) the compliance with legal obligations to which the Health Unit is subject;
 - (iv) the defence of vital interests of the data subject; or yet,
 - (v) the pursuit of legitimate interests of the Health Unit (unless the subject's interests and fundamental freedoms prevail).
- 2.3. There are, however, additional requirements for the processing of special categories of personal data, such as data relating to your health. Therefore, the processing of such particularly sensitive data may only take place in certain cases, in particular whenever the data subject has given explicit consent, when such processing is necessary for the protection of the vital interests of a data subject incapable of giving his or her consent, for the declaration, exercise or defence of a right in a judicial proceeding, when the processing is necessary for the purposes of preventive medicine, medical diagnosis, health care or treatment or management of healthcare systems and services, or even, when the processing is necessary on grounds of public interest regarding public health.
- 2.4. Thus, the data processing required for the provision of health care to Clients, as well as to

communicate and to manage the relationship of Luz Saúde Group Units with them (such as contact data, such as the telephone or e-mail), will be based on the execution of a contract for the provision of health services entered into with the Clients, or on carrying out pre-contractual procedures at their request.

- 2.5. Whenever such processing involves the processing of data relating to the health of Clients or other special categories of data (such as genetic data or data relating to the sex life of Clients), these will be based on the need for processing for the purposes of preventive medicine, medical diagnosis, health care, or health treatment.
- 2.6. Regarding the processing of Personal Data carried out by the Health Unit, including, to inform the Client about news in the provision of the services, products or services of their interest, and to customize and improve their experience as a Client (through satisfaction assessment surveys of the clients), the legal grounds of such processing will be the consent of the data subject, i.e., of the Clients.
- 2.7. In relation to the processing of data made by the Health Unit to improve services, audit them, and to fulfil the respective administrative and commercial objectives, the applicable legal will be the pursuit of legitimate interests of the Health Unit.
- 2.8. Regarding the data processing performed by the Health Unit in the context of compliance with legal obligations, the basis of lawfulness for carrying out such processing - mostly data communications to external entities - will be the need to processing for purposes of compliance with legal obligations.
- 2.9. The processing of personal data in the context of participation in clinical trials and non-interventional studies shall be based on the lawfulness of the consent of the data subjects, i.e., of the Clients.
- 2.10. Finally, the processing of data resulting from video surveillance will be carried out in the pursuit of legitimate interests of the Health Unit for the protection of people and goods in its facilities.

3. Which information will be given to the Data Subjects?

- 3.1. The Health Unit, through its employees, or through the email DPO@luzsaude.pt, will provide Clients with a set of information, unless they are already aware of it, including, regarding:
 - (i) Identity and contacts of the Controller and, where appropriate, of its representative;
 - (ii) Data Protection Officer's (DPO) contacts;
 - (iii) Purposes of the processing of the information collected, as well as its legal basis;

- (iv) Recipients or categories of recipients of personal data, if any;
 - (v) the intention to transfer personal data to a third country and the guarantees implemented for such purpose, if applicable.
 - (vi) the period of retention of personal data or, if this is not possible, the criteria used to define that period;
 - (vii) the existence and conditions of exercise of their rights as data subjects, such as the right of access and rectification, elimination or limitation of the processing, portability of their data, or opposition to processing, under the terms of the legislation regarding the protection of Personal Data;
 - (viii) the right to complain to a supervisory authority; and
 - (ix) the existence of automated decisions including the definition of profiles.
- 3.2. The documents that serve as the basis for the collection of Personal Data must contain the information in 3.1. or refer to it in a document which is easily accessible or available at the moment.
- 3.3. Clients have the right to obtain from the Controller, freely and unrestricted, at reasonable intervals and without undue delay or excessive costs:
- (i) (confirmation of whether or not personal data is being processed concerning him or her, as well as information on the purposes of such processing, the categories of data, the recipients or categories of recipients to whom the data is communicated, the retention period (or the criterion used to set such period), the right to submit a complaint to a supervisory authority and the origin of the data in case it is not collected directly from the Data Subject;
 - (ii) the communication, in an intelligible way, of its data subject to processing and of any available information on the origin of such data;
 - (iii) knowledge of the logic underlying the automated processing of data concerning him or her;
 - (iv) the rectification, erasure or limitation of the processing of data whose processing does not comply with the provisions of the Law on the protection of Personal Data, in particular due to incomplete or inaccurate data;
 - (v) notification to third parties to whom the data have been communicated of any rectification, erasure or limitation of processing, unless this proves to be impossible.
- 3.4. The Client has the right to know, if wishing to do so, all of his / her clinical process (except in exceptional circumstances duly justified and in which it is unequivocally demonstrated that

this may be harmful to him or her).

- 3.5. The Client is also entitled to oppose at any time, at his request and free of charge, to the use of his Personal Data for the purpose of performing direct marketing actions or any other form of prospecting, including the definition of profiles related to such direct marketing actions.
- 3.6. Under the terms of the RGPD, you have the right to withdraw your consent for data processing for which consent constitutes the basis of legitimacy, which does not, however, invalidate the processing made on such data to that date on the basis of prior consent.
- 3.7. The Client may also, at any time, request the deletion of his or her Personal Data, as well as the portability of the same, under the terms of the law.
- 3.8. Without prejudice to any other administrative or judicial remedy, the data subject is entitled to file a complaint with the CNPD or other competent supervision authority in accordance with the law if he or she considers that the respective data is not subject to legitimate processing by the Health Unit, in accordance with the applicable legislation and this Policy.
- 3.9. The Client may exercise the rights referred to in the previous numbers through the contacts identified in section VII "**How can I obtain more information, and which are the contact information for this purpose?**".

4. How do we assure the security of Information in paper format?

- 4.1. In respect of the safety issue, clinical process in paper format is by nature more vulnerable and, more effective mechanisms must be carried out to ensure that unauthorized access to information is not possible.
- 4.2. The Health Unit will comply, among other things, with the following rules for accessing and consulting paper documents:
 - (i) The obligation to consult the clinical files for purposes other than the provision of medical care (e.g. for scientific research or other duly authorized purposes) must be done within the file room itself or in a proper place for such purpose, and the clinical files may never leave the hospital;
 - (ii) The prohibition of taking any clinical process for periods longer than 10 (ten) business days, unless special authorization is granted on a case-by-case basis, taking into account the reasons that may be invoked;
 - (iii) the prohibition of clinical trials being available to the patients themselves, their relatives and / or visitors;
 - (iv) The existence of a permanent control of the consult of the clinical files processes;

(v) The transportation of clinical files to the services that requested it by employees of the requesting service or responsible of the file;

4.3. The creation of organization / ordering mechanisms that guarantee the effective location of clinical files.

5. Which measures do we take for the security of Information?

5.1. The Health Unit implements the necessary technical and organizational measures to protect Personal Data against its accidental or unlawful destruction, accidental loss, alteration, unauthorized release or access, in particular when the processing involves its transmission through a network, as well as against any other form of illicit processing thereof, and such measures must be complied with by its employees.

5.2. These measures shall ensure, in the light of the available technical knowledge and the costs resulting from its application, an adequate level of security in relation to the risks that the Personal Data Processing presents and to the nature of the Personal Data to be protected.

These measures include:

(i) Pseudonymization and encryption of Personal Data;

(ii) The existence of users with different levels of access;

(iii) The assignment of periodic change passwords;

(iv) The existence of servers with restricted physical and logical access;

(v) The existence of Firewalls;

(vi) Back-up of computerized data;

(vii) Limited access to information systems;

5.3. The Health Unit also adopts special security measures when dealing with Special Categories of Data.

6. How do we assure the confidentiality of your Personal Data?

6.1. The employees of this Health Unit and the providers of services contracted by the same unit undertake to maintain professional secrecy with respect to all Personal Data that they may have had access to or have been provided with by this Lu Saúde Health Unit.

6.2. The health professionals of the Health Unit must keep confidential all the facts that have come to their knowledge in the exercise of their activity or because of it, when revealed by the client or a third party at his or her request, when the doctor became aware of it or it has been communicated to him by another physician, in accordance with the provisions of article 87 of

the Code of Ethics of the Medical Professional Association (CDOM).

- 6.3. The directors, chiefs of service and medical assistants of the clients are individually and collectively bound to keep professional secrecy regarding clinical information which, as a matter of professional secrecy, is contained in the individual client's file (Article 69 of the CDOM)

III

COMMUNICATION, TRANSFER AND CONNECTION OF PERSONAL DATA

1. To whom your Personal Data will be communicated?

- 1.1. This Health Unit may legitimately communicate your Personal Data to third parties whenever:
- (a) the data subject has given unambiguous consent;
 - (b) it deems such communications as necessary or appropriate (i) in light of applicable law, (ii) in compliance with legal obligations / court orders, (iii) to respond to requests from public or governmental authorities or (iv) to accreditation purposes of the Health Unit or certification of its services, as well as for the evaluation and measurement of the levels of service of the Health Unit;
 - (c) the communication is carried out to protect the vital interests of the holder of the Personal Data.
- 1.2. In this context, the Health Unit may transmit the Personal Data to the Health Regulatory Entity, the Central Administration of the Health System (ACSS), IP, the Shared Services of the Ministry of Health (SPMS), INFARMED, the Regional Health Administrations, Courts, Solicitors, criminal police agencies or the Public Prosecutor's Office, whenever notified for such purpose or whenever it is necessary for the fulfilment of legal obligations, as legally required.
- 1.3. In any of the above situations, the Health Unit undertakes to take all reasonable steps to ensure the effective protection of the Personal Data it processes.

2. And, in the case of data international transfers?

In the event of international transfers of Personal Data, the Health Unit shall implement the necessary and appropriate measures under the applicable law to ensure the protection of the Personal Data subject to such transfer, complying strictly with the legal provisions regarding the requirements applicable to such transfers, namely informing Clients accordingly.

3. In which conditions your data is available to other Luz Saúde Health Units?

Your identification and contact information, as well as your health data, will be included in Health Unit databases that will be linked to the databases of the other Luz Saúde Health Units, for the maintenance of a client record and integrated health care in all units.

IV

PORCESSING BY A PROCESSOR

In which situation your data will be processed by processors of this Health Unit?

The Health Unit shares the Personal Data with entities contracted by it for the purpose of processing them, on behalf of and under the instructions of this Health Unit, as the Controller of the Processing. The processing of Personal Data by processors is governed by a contract or legal act that binds the Processor to the Controller and which stipulates, in particular, that the Processor only acts through documented instructions of the Controller, among other things, and in compliance with the obligations referred to in Article 28 of the RGPD.

In this sense, the Health Unit has adopted clear rules for contracting the processing of Personal Data with its Processors and requires them to adopt appropriate technical and organizational measures to protect Personal Data.

V

PROCESSING OF SPECIAL CATEGORIES OF DATA

The Health Unit will only process Personal Data when there is a legal basis for it, in accordance with the provisions of Article 9 of the GDPR.

The processing of the Personal Data referred to in the preceding paragraph may only be carried out by or under the responsibility of a professional subject to the obligation of professional secrecy or by another person also subject to an obligation of confidentiality, and appropriate measures of information security shall also be guaranteed, as well as the Client's right to information.

VI

SPCIFIC PROCESSING

1. How is your data going to be processed in the context of clinical trials and non-interventional studies?

1.1. Whenever you have given consent for participating in a study or clinical trial, the entity that will act as Controller of the processing of Personal Data will be the entity promoting the study or

trial. In most cases, the promoter will be an external entity regarding the Luz Saúde Group, so that this Health Unit and its medical researchers will act, under protocols entered into with the promoters, merely as Processors for the purpose of processing Personal Data in this context. There will be other cases where Luz Saúde Group units may act as promoters and, therefore, as Controller.

- 1.2. Without prejudice to the above, the employees of the Health Unit should not take part in any clinical trial or non-interventional study without checking whether all necessary formalities have already been carried out, namely:
 - (i) Issuance of a prior opinion by the competent Ethics Committee;
 - (ii) Issuance of prior authorization of Infarmed, IP;
 - (iii) Obtaining informed, free, specific, express, written, dated and signed consent of the personal data subject (condition of legitimacy of the processing). The consent document may be included in the same document for participation in the trial and in the consent for Personal Data processing.
- 1.3. If you have any additional questions, you should contact the Luz Saúde DPO.

2. Video surveillance

- 2.1 The installation of a video surveillance system implies that an informative notice of the existence of such video surveillance system, in the premises, which should contain the following text, followed by an identifying symbol (a camera):

"For your protection, this place is under surveillance of a closed circuit of television, which carries out the recording of [images and sounds]".
- 2.2 The recording of images and sounds can only be retained for a period of 30 (thirty) days, after which period it will have to be destroyed.
- 2.3. The viewing and availability of the recordings is subject to specific rules, and you should consult the DPO of Luz Saúde to make a request for viewing or on the availability of images, provided the legally applicable requirements are met.

VII

FINAL PROVISIONS

1. How may I obtain further information, and which are the contact details for such purpose?

You may contact the Data Protection Officer (DPO) of the Luz Saúde Group for more information on

the processing of your personal data, as well as any questions related to the exercise of the rights attributed to you by the applicable legislation and, in particular, those referred to in this Privacy Policy, through the following contacts:

- Telephone: +351 217 104 430
- E-mail: DPO@luzsaude.pt
- Address: Rua Carlos Alberto da Mota Pinto, 17-9.º, 1070-313 Lisbon.

2. Changes to the Privacy Policy

The Health Unit reserves the right to, at any time, amend or update this Privacy Policy, being those changes duly updated in our channels and online platforms and communicated to Clients.

Date of the last updated version 17/07/2018