



AKAPEOPLE PRIVACY POLICY

AkaPeople is committed to respecting the privacy of its users and to protecting the personal data entrusted to it.

This Privacy Policy explains what we do with your data, how we collect, use and process your personal data, regardless of giving you support for the placement in a new job, maintaining a relationship with you in order to make your placement, using your data to require references regarding a candidate of ours, receiving a service from you, rendering a service to you or even if you are visiting our website.

This Privacy Policy is governed by the legislation applicable, namely the Regulation EU 2016/679, General Data Protection Regulation (GDPR), applied to our candidates, workers, clients, suppliers, users of the website (www.akapeople.pt) and other people who we may contact in the sense of getting more information on our candidates.

1) Name and Contact of the person responsible for the processing of Data:

Responsible for the processing of data is ALSO KNOWN AS PEOPLE, LDA. (AkaPeople), limited company with a share capital of €105,000.00 (one hundred and five thousand Euro) with head office in Rua Engenheiro Ferreira Dias, nº 924, E38, 4100-246 Porto, with the Tax ID number 514497360. Telephone: (+351) 223 190 645 E-mail: privacidade@akapeople.pt

2) Which personal data do we collect and what is the purpose of that

Data regarding the Candidate: within the scope of recruiting and other similar evaluative activities, by request of our clients and with the goal to offer the most suitable job opportunities to you and your profile. We only require relevant and fundamental information to provide you with the most suitable job opportunity, such as: name, age/date of birth, elements for contact, history of employment and education, current remuneration, elements of the driving licence, immigration status, your interests and needs regarding the future job, as well as additional information you may choose to share with us or additional information your reference people choose to share with us about you. Finally, information may also be collected through networks and sources by third parties, such as employment portals or clients who consider it relevant and may choose to share some information on you with us;

Data regarding the AkaPeople Workers: all the biographical, civilian, fiscal and bank data in order to proceed to the drawing, maintenance and termination of work contracts, management of working time, management of project time, absences and holidays, representation expenses, salary processing, career development, audits, use of internal databases and other tools,



control of accesses, insurances, hygiene, work safety and health, emergency contacts, evaluation, training, as well as all the personal data strictly necessary to meet the legal obligations.

Data regarding the Client: should you be our client and within the scope of provision of services, we may collect or use information on you or the people of your company. In addition, we may notify you or send you content published by AkaPeople which may be potentially useful and relevant for you. The data collected refers to your contact data or individual contacts from your company. We may eventually have information that someone in your company may have chosen to share with us.

Data regarding the Supplier: should you be our supplier, we will need some information so that the service you provide may run normally. We will need the contact data of the people relevant in your company, as well as the bank data to proceed to payment.

Data regarding the People whose data we received from Clients: within the scope of the referencing made, what we need is for you to validate and/or confirm the information presented by our candidate and/or potential collaborator. To achieve such reference, we will need name, contact number and e-mail.

Data regarding the website Users: we only collect a reduced amount of data from the users of the website, which we then use to help us improve your experience when using our website and to help us manage the services we render better. The personal data of the users are collected only when one of the functionalities available is subscribed and it is fundamental for AkaPeople to be able to present, clarify or include in an application process. The data we collect for such purpose is Name, Telephone and E-mail and any other the user may choose to send. AkaPeople, through Google Analytics, also collects the following aggregate data: geographical origin, type of device, operating system, operator, date/hour of access and referencing addresses. The use of this information by AkaPeople will be made in an aggregated and anonymous manner. The data collected for this purpose do not have personal identification data or private information. The analysis made from the generated statistic information will allow the interpretation of the use patterns and the improvement of the user experience and the levels of service. AkaPeople also uses cookies on the website to improve the performance and the experience of the user. AkaPeople may also use web beacons or other technology for purposes similar to the above mentioned. Should you intend to know more about cookies, namely how we use them and which options you have available, please check number 10 in this document.

3) How do we collect personal data

Data regarding the Candidate: we collect your personal data through you or third parties:

- through you, as follows:

- a) You registered your data on our website or filled in an application form;



- b) You sent your CV by e-mail to one of our Consultants or you were interviewed by someone from our team;
- c) You delivered your CV, in person and in paper, at an event or an employment fair or you left it directly in our offices;
- d) You applied to an opportunity through an employment portal, employment aggregator, social media campaign or micro-site which then forward it to us.

- through third parties, as follows:

- a) Our clients shared, with us, information on you;
- b) The people you mentioned as reference shared personal information on you;
- c) We performed a research on potential candidates in the sources of third parties, such as LinkedIn or other networks and employment pages;
- d) You follow our social media and we collected information through those websites.

Data regarding the AkaPeople Worker: we collect your information through the on boarding form, e-mails and follow-up meetings.

Data regarding the Client: we collect your personal data through you or third parties:

- through you, as follows:

- a) Should we contact you by telephone or e-mail or in person through our commercial activities;
- b) Should you proactively contact us.

- through third parties, as follows

- a) From financial companies and others which provide for relevant information;
- b) From candidates who mentioned you as a reference contact;
- c) From lists of participants in fairs or events.

Data regarding the Supplier: we collect your personal data during our joint collaboration.

Data regarding the People whose data we received from Clients: we collect your contact data solely in the cases when a candidate of ours has mentioned you as a reference contact.

Data regarding the website Users: please verify the previous point.

4) How do we use personal data

Your data will only be used should one of the following take place:

- a) You gave your consent by means of signatures or acceptance of an online or printed form.
- b) Your data are necessary for legal procedures AkaPeople may be subjected to before all entities and authorities;



- c) Your data are necessary to meet the requirements for purposes of work legislation and contracts;
- d) Valid and legitimate interests by AkaPeople as long as they do not overlap the rights and guarantees of the data subject.

Data regarding the Candidate: the main reason for the use of personal data is to provide them with the job opportunities and other work functions which may be more suitable for you and your profile. In addition, we may also use your personas data for analysis and monitoring of diversity and marketing.

We use your personal data as follows:

To store and update your data, if necessary, on our database, within the scope of recruiting and other evaluative activities; To assess your data regarding the job vacancies we thought adjusted to you; To send your information to clients, or your CV (should you have decided to share it with us) or other data which may have been collected through you or other sources (e.g.: LinkedIn, Xing, etc.), with the goal to send your application for a job opening or to assess your eligibility for one vacancy; To perform guided marketing actions or to require your participation in satisfaction surveys; To meet the obligations arising from contracts celebrated by us or any other legal obligations.

Data regarding the AkaPeople Worker: the main reasons to use your personal data is to ensure the work, legal and human resource management procedures of our teams.

We use your personal data as follows:

To store and update our systems/databases so that we can process your salary and further obligations as your employer; To manage within the scope of evaluation, training, team management, record of time and absences, among other activities considered pertinent in a labour relation; To conduct satisfaction surveys and marketing campaigns.

Data regarding the Client: the main reason to use data on clients is to ensure we render a service suited for the demands of the latter and with the proper quality. In addition, we may use them for internal business analysis and marketing campaigns.

We use your personal data as follows:

To store and update our systems/databases so that we can contact you within the scope of the services we render; To make the record of the meetings so that we can render a service suited for your demands; To treat data on satisfaction surveys and guided marketing campaigns.

Data regarding the Supplier: the main reason to use your personal data is to ensure the service you provide for us follows the corresponding commercial agreement, as well as the legal obligations.

We use your personal data as follows:

To store and update our systems/databases so that we can contact you within the scope of the services you render; To achieve support and/or services from you; To comply with the legislation and legal obligations.

Data regarding the People whose data we received from Clients: the main goal of the use of your personal data is to enable our candidates a positioning more suited to their profile, which



is why referencing and further indications may allow us to present them with the more adjusted job opportunity, while proving a better service. In addition, your data may also be used for us to present you with job opportunities you may find interesting.

We use your personal data as follows:

To store and update our systems/databases so that we can contact you to get references on our candidates; To present you with the opportunities we consider fit for you.

Data regarding the website Users: the main reason to use your personal data is to help us improve your experience while using our website and to help us better manage the services we render.

We use your personal data as follows:

To store for a better experience as a website user through cookies (please, verify number 10 of this document).

5) Who do we share your personal data with

Data regarding the Candidate: your personal information may be disclosed to AkaPeople clients within the scope of the services we render; we may also share them, when pertinent, with third party entities, such as service providers AkaPeople resorts to.

Data regarding the AkaPeople Worker: Except when otherwise stipulated, your information may be disclosed to third party entities, such as service providers AkaPeople resorts to, within the scope of the services rendered.

Data regarding the Client: your personal information may be disclosed to AkaPeople candidates within the scope of the services we are rendering; Except when otherwise stipulated, we may also share the information, when pertinent, with third party entities, such as service providers AkaPeople resorts to.

Data regarding the Supplier: Except when otherwise stipulated, your personal information may be disclosed to third party entities, such as service providers AkaPeople resorts to.

Data regarding the People whose data we received from Clients: ; Except when otherwise stipulated, your personal information may be disclosed to third party entities, such as service providers AkaPeople resorts to.

Data regarding the website Users: Except when otherwise stipulated, your personal information may be disclosed to third party entities, such as service providers AkaPeople resorts to.

6) For how long do we keep your personal data



Your personal data will be preserved for a minimum period of time necessary and proportional to the prosecution of the goals already described on this Privacy Policy.

In the case of candidates: should there not be any relevant contact for a period of 2 years with you and should there not be the need to maintain the record, due to any legal or research need, we will delete your personal data from our database.

In the case of AkaPeople workers: your data will be preserved for the purpose of meeting the legal obligations and of protecting the legitimate interests of AkaPeople.

7) How do we safeguard your personal data

AkaPeople takes the necessary precautions and those legally required to ensure the protection of the information gathered with its users. Among other measures, the following technical and organisational measures are implemented to ensure the safety and confidentiality of the personal data: Physical safety, firewall, access passwords and anti-virus programmes. Should you suspect any improper use, loss or non authorised access to your personal information, please do inform us immediately.

8) Transfer to other countries

There is no transfer of data to other countries.

9) Your rights

All personal data are handled according to the legislation in force and following the described Privacy Policy; the data subjects have the following rights which they may exert, personally in our facilities or in writing, through our e-mail privacidade@akapeople.pt, anytime and free of costs.

Right to access: knowing whether we have information on you and in case we do, you may have access to it.

Right to object: if we are using your data because we consider it to be necessary for our legitimate interests and you do not agree with that, you have the right to object to it.

Right to rectify: you can rectify or complete incorrect or incomplete personal data.

Right to withdraw consent: should we have obtained your consent to proceed to the processing of your personal data for certain activities, you may withdraw your consent at any given time.



Right to limit processing: you may exert your right to limit processing in the cases when it is not clear if and when the personal data must be deleted.

Right to delete: you may require the deletion of your personal data if they are no longer necessary for the purpose which you were informed of.

Right to portability: you have the right to portability of the previously presented personal data, in a structured manner, compatible and in a readable form.

The data subject has the right to present a claim to the National Data Protection Council or any other control entity.

To exert your rights, please contact us through the following e-mail: privacidade@akapeople.pt

You may be asked to prove your identity in order to ensure the sharing of the personal data is only made with the data subject. You must bear in mind that, in some cases, and according to the applicable law, your request might not be immediately answered or fully satisfied.

10) What are cookies and how do we use them

A cookie is a data file which is stored in the hard disk of your computer. They are used by almost every websites and do not harm your system. We use them to trace your activity in order for it to help us ensure you have the best browsing experience possible, given that we can use the cookies to ensure we present you with the options adjusted to your preferences in your following visit. We can also use cookies to analyse the traffic and for publicity purposes.

There are two main types of cookies: the session ones and the permanent ones. The session cookies are temporary and only remain in the cookies file until the user leaves the website, because they are deleted when the browser is closed. The information achieved is used to analyse traffic patterns, which eases the identification of the problem. The permanent cookies are kept until the user deletes them manually or the expiration date is reached. They are used every time the user visits the website for a more customised service, adjusting navigation to his/her preferences.

Of these, we use cookies for a wide range of purposes. Analytical cookies are anonymously used for statistical purposes. Functionality cookies save the preferences of the user. Third party cookies measure the success of the applications and can be used to customise buttons, menus, icons and other graphical interface components with the data of the user.

Should you intend to verify or alter the type of cookies you accept, you may usually do it in the definitions of your browser.

11) Contact us



Should you have any doubt regarding this policy or any other privacy questions, or should you intend to exert any of your rights, please contact us by e-mail: privacidade@akapeople.pt or the following postal address: Rua Eng^o Ferreira Dias 924 - E38 | 4100 - 246 Porto.

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