**CONFIDENTIALITY POLICY**

**1. Basic information**

|  |  |
| --- | --- |
| Entity responsible for treatment | Vialivre, S.A. |
| Purposes | Legitimacy |
|  | - Compliance withlegal obligations arisingwithin the legal relationshipestablished.- User Management,namely requests,suggestions and complaints.- Collection of fees fromtolls and administrative fees.- Process management ofLitigation. | - Compliance with obligationsLegal and Exercise of Functions of public interest in whichVialivre is invested.- Exercise of functions ofpublic interest in whichVialivre is invested.- Exercise of functions ofpublic interest in whichVialivre is invested.- Pursuit of interestslawful of the person responsible for treatment.  |
| Recipients | Users of the Norte Litoral Concession (A28) and the Concession of the Algarve (A22) |
| Rights | To access, rectify, delete your data, limit the processing of your data, request portability of your data, object to the processing of your data under the terms and conditions set out in the Additional Information.  |
| Additional information | See the section with additional and detailed information on data protection. |

**2. Additional information**

This Privacy Policy is intended to help you understand what data we collect, why we do it and what we do with it, by giving you to know, the User, the measures we take to protect his/her privacy by that we advise you to read this document carefully.

This document is part of the Terms and Conditions of the Website - http://www.vialivre.pt/ (hereinafter the "Website") and is intended to regulate the collection and processing of personal data provided by Users (including via the Call Center, User Support Shops, e-mail and post and Surveillance Brigades), as well as the exercise of their rights regarding such data, under the Personal Data Protection Legislation in force.

A visit to the Website does not in itself imply any registration of any personal data

that identifies the user.

However, access to certain services or information provided by Vialivre, namely within the framework of exhibitions sent to the User Support Centre, whether written, in person or verbally, may be subject to the provision of personal data proving that the user holds them, without which Vialivre may not assess the communication forwarded and provide requested information.

**2.1 Who is the person responsible for processing your personal data?**

Identification: Vialivre, S.A.

Address: Av. da República, n.º 32, 3.º Esq., 1050-193 Lisboa

Telephone: 707201292

E-mail: geral@vialivre.pt

Data Protection Officer contact: epd@cintraportugal.pt

**2.2 For what purpose do we process your personal data?**

The personal data collected is for the purpose of

- Management of Users, namely attendance, requests, suggestions and complaints;

- Collection of tolls and administrative fees;

- Litigation process management;

- Fulfilment of legal obligations arising from the legal relationship established with a view to collecting toll fees in Norte Litoral Concessions (A28) and the Algarve Concession (A22).

**2.3. To whom are your data communicated?**

Vialivre may hire a third party to provide logistics support or other administrative or security support. These parties may have access to personal data to the extent necessary to provide such services, ensuring that Vialivre uses only service providers that provide the necessary and appropriate technical and organizational measures to protect their personal data.

In view of Vialivre's duties, and depending on their purpose, its data may be shared with third parties, which include public bodies for the purpose of fulfilling legal or regulatory obligations, contractual or public interest functions.

**2.4 Legal basis for the processing of personal data**

Vialivre treats the personal data collected on the basis of the legal grounds for processing the exercise of public interest functions in which Vialivre was invested, namely on the basis of Concession Contracts and Service Provision Contracts concluded with the Portuguese State and the Portuguese Infrastructures, respectively, as well as on the basis of Law n.25/2006, of 30 June, which regulates the penalty regime applicable to transgressions in the area of Road Infrastructures where toll fees are due (Motorway A28 and Motorway A22), as well as the fulfilment of legal obligations.

**2.5 How long do we keep your personal data?**

Your personal data will be kept during the period of limitation or of expiry of the associated rights, without prejudice to Vialivre being able to keep them beyond these periods for the fulfilment of legal obligations and for statistical purposes, and for the latter purpose anonymize them.

**2.6 What are your rights?**

In accordance with the applicable data protection legislation, you are entitled to:

1. Request access to your personal data: You have the right to obtain confirmation as to whether or not any personal data concerning you are being processed and, if so, to request access to your personal data. Access information includes - among other things - the purposes of the processing, the categories of personal data concerned and the categories of recipients or recipients to whom your personal data have been or will be disclosed.
2. Request the rectification of your personal data: you have the right to obtain the rectification of inaccuracies concerning your personal data. Having regard to the purposes of the processing, you have the right to have your incomplete personal data completed, including by means of an additional declaration.
3. Requesting limitation of the processing of your personal data: under certain circumstances, you may have the right to obtain limitation of the processing of your personal data. In this case, your data will be marked and can only be processed by us with your consent or for certain purposes.
4. Requesting data portability: under certain circumstances, you may have the right to receive the personal data you have provided us with, in a structured, commonly used and automatically readable format. Alternatively, you may request the transmission of your data to another entity which becomes responsible for the processing of your data.
5. Oppose the processing of your personal data: you have the right, on grounds relating to your particular situation, at any time and within the limits provided for by law, to oppose the processing of your personal data. In that case, Vialivre will cease the processing of your personal data, unless there are compelling legitimate grounds for such processing that override your interests, rights and freedoms, or for the purpose of asserting, exercising or defending a right in a legal proceeding.
6. Withdraw Consent: a right that allows you to withdraw your consent, but which can only be exercised when your consent is the only condition for legitimacy.

You also have the right to lodge a complaint with the competent data protection supervisory authority (http://www.cnpd.pt). In addition, you can contact our Data Protection Officer by writing to epd@cintraportugal.pt. In order to exercise the aforementioned rights to access, rectify, erase or transfer your data, limit or oppose their processing in certain cases, as well as to revoke the consents provided, the User may send a written communication to Vialivre, S.A, (Av. da República, n.º 32, 3. Esq, 1050-193 Lisbon, for the attention of the Legal Department) with your name, surnames, a copy of your Identification Document (erased) or any other document or means by which you prove that you are the holder of the personal data, an address for the purpose of notifications and the right you wish to exercise.

**2.7 What security measures do we use to protect your personal data?**

Vialivre makes its best efforts to protect Users' personal data against unauthorized access via the Internet. For this purpose it uses security systems, rules and other procedures in order to ensure the protection of users' personal data, as well as to prevent unauthorized access to data, its improper use, its disclosure, loss or destruction, particularly via the Internet.

It is, however, the responsibility of the User to ensure and guarantee that the computer he/she is using is adequately protected against harmful software, computer viruses and worms. Additionally, you should be aware that without the adoption of adequate security measures (for example, the safe configuration of the navigation program, updated antivirus software, security barrier software and the non-use of software of doubtful origin), the risk of personal data and passwords being accessed by third parties, without authorization to do so, is increased.

It should be noted that whenever data collection is carried out over open networks, such as the Internet, your data may circulate without security conditions, with the risk of being seen and used by unauthorized third parties.

**2.8. Changes to Privacy Policy**

Vialivre reserves the right, at any time, to change, add or revoke, partially or totally, this Privacy Policy. Any changes will be immediately disclosed on this same page and notified to the owners of the data.

**COOKIE POLICY**

**1. What are cookies?**

A cookie is a small file that is transferred to your device (be it a computer, smartphone or tablet) when you access a web page and allows the owner of the page to store or extract information about your browsing.

Vialivre wants to make available all necessary information about the cookies used on our Website to enable you to make a fully informed decision regarding their use.

**2. What kind of cookies does the Platform use?**

This website uses cookies to enable, personalize and analyze navigation, improving the quality of services offered through this website.

Cookies are classified into different categories, although they can be in more than one:

1. **Temporary cookies:** They are not installed on your device and are deleted at the end of your session.
2. **Definitive Cookies:** Installed on your device and are not deleted when the browser is closed.
3. **First-class Cookies:** Cookies sent to your device from our Platform.
4. **Third-party cookies: Cookies** sent to your device from a domain that is not managed by Vialivre but by another entity that uses the data obtained through cookies. In order to ensure a wide range of functionalities, our Platform uses cookies from MeoWallet.
5. **Technical Cookies:** allows you to navigate through our Platform and use its features and services, such as controlling data communication, identifying the session, restricting access to certain areas and using security features during navigation.
6. **Customizable Cookies:** Allows you to access our Platform through certain features or functionalities such as the language, type of browser of the region from where access to the service is established.
7. **Analytical Cookies:** Used to monitor and analyze user behavior. This type of cookies allows us to evaluate the activity on our Platform using aggregated or statistical information about browsing habits. This Platform uses analytical cookies, some of which are provided by Google Analytics (https://www.google.com/intl/en-GB/policies/technologies/cookies/).

**3. Who uses cookies?**

The information collected through the *cookies* transferred from the domain managed by Vialivre is used by the owner of the Vialivre Platform, i.e. Vialivre, S.A.

Other companies such as Youtube, Inc., Slideshare and Euroland.com AB can access the information collected through cookies managed by their domains. Click on the corresponding link for more information.

**4. How can the User manage cookies?**

The Internet browser allows you to view, disable, restrict, block and remove cookies. The links below explain how to set cookies in major browsers, but we advise you to consult your browser's "Help" for detailed and up-to-date information on your browser version and device.

Internet Explorer Version 7 and 8

http://windows.microsoft.com/es-Es/windows-vista/Block-or-allow-cookies

Internet Explorer Version 9

http://windows.microsoft.com/es-ES/Windows7/How-to-manage-cookies-in-Internet-Explorer-9

Safari (iPhone, iPad, Mac and other Apple devices)

http://supporte.apple.com/kb/PH5042?viewlocale=es\_ES http://support.apple.com/kb/HT1677?viewlocale=es\_ES

Google

https://supporte.google.com/chrome/answer/95647?hl=es&hlrm=en

Firefox

http://suporte.mozilla.org/es/kb/cookies-information-que-los-sitios-web-guardan-en-?redirectlocale=en-US&redirectslug=Cookies

Opera

http://help.opera.com/Windows/11.50/es-ES/cookies.html

Android

http://supporte.google.com/android/?hl=es

Windows Phone

http://www.windowsphone.com/es-ES/how-to/wp7/web/changing-privacy-and-other-browser-seetings

Blackberry

http://docs.blackberry.com/en/smartphone\_users/deliverables/18578/Turn\_off\_cookies\_in\_the\_browser\_601072866\_11.jsp

Please note that some browsers allow you to browse in private or anonymous mode, which means that cookies are installed on the device, but they are deleted automatically when the session ends.