

Privacy Policy

Last Updated 20 May 2018

Your privacy is very important to POLARIS. This Privacy Policy describes how we protect the privacy and security of the information and are dedicated to protecting the confidentiality and privacy of information entrusted to us.

POLARIS respects the legislation on the protection of privacy and the processing of personal data, by processing and storing personal information in accordance with the Data Protection Act 2004 (the "Data Protection Act", which includes any modification or amendment to that Act), this Privacy Policy and the provisions of other applicable laws, regulations and rules.

Please read this Privacy Policy to learn about your rights, what information we collect, how we use and protect it.

1. Who can you contact for privacy questions or concerns?

If you have any questions, concerns or comments or if you would like further information about this Privacy Policy, how we handle your Personal Data, or otherwise wish to enforce your data protection rights please contact us at:

Polaris Supplies, Sociedade Unipessoal, Lda
Rua dos Murças, 15 – 3º L
9000-058 Funchal – Madeira - Portugal

Email:

geral@polaris.pt

POLARIS has not designated a Data Protection Officer, but we're committed to protecting your rights and we can be contacted directly via the above details (we aim to respond within 30 days from the date we receive privacy-related communications).

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Data Protection Commissioner under the Data Protection Act.

2. How do we collect personal data?

When we address the matter of your information, we are referring to your 'personal data' as defined by the Data Protection Act and it includes information that can recognize you as a living individual, whether by itself or when used in conjunction with other information which we hold. Some examples include, but are not limited to, your name, your telephone number, your email address, your place and date of birth.

For general web-browsing of this website, your personal data is not revealed to us, although certain statistical information is available to us via our internet service provider as well as through the use of special tracking technologies. Such information tells us about the pages you are clicking on or the hardware you are using, but do not indicate your name, age, address or anything we can use to identify you personally.

More precisely:

Directly: We obtain personal data directly from individuals in a variety of ways, including obtaining personal data from individuals who provide us their business card, complete our print forms, attend meetings, visit our offices or apply for open position. In addition, whenever you request to be contacted by us, we'll be having access to elements such as name and email.

Indirectly: We obtain personal data indirectly about individuals from a variety of source, not limited to but including:

- Public sources -- Personal data may be obtained from public registers, news articles, sanctions lists, and Internet searches.
- Business clients -- Our business clients may engage us to perform professional services which involves sharing personal data they control as part of that engagement.

3. What categories of personal data do we collect?

We may obtain the following categories of personal data about individuals through direct interactions with us, or from information provided through client engagements, from applicants, our suppliers and through other situations including those described in this Privacy Policy.

a) Personal Data

Here is a list of personal data we commonly collect to conduct our business activities.

- Contact details (e.g., name, company name, job title, work and mobile telephone numbers, work and personal email and postal address).
- Professional details (e.g., job and career history, educational background and professional memberships, published articles).
- Financial information (e.g., taxes, payroll, investment interests, pensions, assets, bank details, insolvency records).

b) Sensitive Personal Data

We typically do not collect sensitive or special categories of personal data about individuals. When we do need to process sensitive personal data, it is with the consent of the individual unless it is obtained indirectly for legitimate purposes.

We may have a contractual arrangement with you and to fulfil our obligations we need to process your personal data (e.g. you are a client). You may have expressly asked us to do something or have otherwise given your clear consent to us that you are happy for us to process your data (e.g. for operational and/or administrative purposes, or simply responding to a question you may have asked us or other feedback you may have given us).

c) Child Data

Protecting children's privacy is important to us. For that reason, we do not knowingly collect personally identifiable information from children under the age of 16, nor is any part of our website targeted to attract anyone under 16. We request that all visitors to our website who are under 16 not disclose or provide any personal data and discontinue use of our website.

4. What lawful reasons do we have for processing personal data?

In most cases, we collect personal data that you choose to provide to us so that we can provide you with a service you have requested from us such as establishment of a corporate vehicle for example. The relevant information is then used by us to communicate with you on any matter relating to the conduct of your instructions in general.

We may rely on the following lawful reasons when we collect and use personal data to operate our business and provide our products and services:

- Contract – We may process personal data in order to perform our contractual obligations.
- Consent - We may rely on your freely given consent at the time you provided your personal data to us.
- Legitimate interests – We may rely on legitimate interests based on our evaluation that the processing is fair, reasonable and balanced in order to deliver the professional services our clients have engaged us to provide.
- Legal obligations and public interests – We may process personal data in order to meet regulatory and public interest obligations or mandates.

5. Why do we need personal data?

We aspire to be transparent when we collect and use personal data and tell you why we need it, which typically includes:

- Providing professional advice and delivering reports related to our services. Our services may include reviewing client files for quality assurance purposes, which may involve processing personal data for the relevant client.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Seeking qualified candidates.
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.
- Complying with legal and regulatory obligations relating to countering money laundering, terrorist financing, fraud and other forms of financial crime.

6. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services if we believe disclosure is in accordance with, or required by, any contractual relationship with you, applicable law, regulation or legal process, unless such information is protected by duties of confidentiality owed to our clients or to other persons.

Personal data may be processed by us and/or our suppliers, as well as any other third party service providers who are performing certain services on our behalf for the purposes specified above (for example, financial institutions, and/or relevant custodians and investment managers) or on your specific instructions (for example, where you ask us to transfer to another service provider your personal information and/or documents relating to an entity we manage or a service we have provided to you).

Such third parties have access to personal data solely for the purposes of performing the services specified or to comply with applicable laws and not for any other purpose (unless you instruct us to transfer personal information and/or documents to another service provider, in which case that service provided shall be given such access to your personal data as you expressly authorise us to give or otherwise under any applicable contract you may have with them).

We require these third parties to undertake security measures consistent with the protections specified in this Privacy Policy. Such third parties may be located within or outside of Portugal.

In addition it may be required to us by law or by a court to disclose certain information about you or any contract we may have with you to relevant regulatory, law enforcement and/or other competent authorities, unless such information is protected by duties of confidentiality owed to our clients or to other persons.

7. Do we transfer your personal data outside the European Economic Area?

We store personal data on servers located in the European Economic Area (EEA). We may transfer personal data to reputable third party organisations situated inside or outside the EEA when we have a business reason to engage these organisations. Each organisation is required to safeguard personal data in accordance with our contractual obligations and data protection legislation.

8. Do we use cookies?

Our website may use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. Cookies are small pieces of information that a website transfers to the hard drive of a visitor's computer or mobile device for temporary record-keeping purposes.

In addition, we may use cookies for statistical collection or analysis to monitor general usage patterns of customers on our website (such as the amount of time spent on our website).

They are unique to you or your web browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them, or until they expire.

Most browsers used by visitors have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent, but setting a browser to reject cookies will limit the range of features available to the visitor on our website.

9. What are your data protection rights?

Your data protection rights are highlighted here:

- Access – You can ask us to verify whether we are processing personal data about you, and if so, to provide more specific information.
- Correction – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you.
- Erasure – You can ask us to erase (delete) your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- Processing restrictions – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise, or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- Data portability – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another company if it is technically feasible.

- Right to Object to Direct Marketing including Profiling – You can object to our use of your personal data for direct marketing purposes, including profiling. We may need to keep some minimal information to comply with your request to cease marketing to you.
- Right to Withdraw Consent – You can withdraw your consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it. No fee is required to make a request unless your request is clearly unfounded or excessive. Depending on the circumstances, we may be unable to comply with your request based on other lawful grounds.

10. What about personal data security?

We have put appropriate technical and organisational security policies and procedures in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We aim to ensure that access to your personal data is limited only to those who need to access it. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may apply pseudonymisation, de-identification and anonymisation techniques in efforts to further protect personal data.

11. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations and professional obligations that we are subject to.

We will dispose of personal data in a secure manner when we no longer require it and do not need to keep it for legal or fiscal matters.

12. Do we link to other websites?

Our website may contain links to other sites, please review the destination websites' privacy policies before submitting personal data on those sites. Whilst we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites.

13. Do we change this privacy policy?

We regularly review this Privacy Policy and will post any updates to it on this webpage. This Privacy Policy was last updated 20 May 2018.

The latest version of our Privacy Policy will be effective once it is published and by continuing to consult, access or use our website from this date, you consent and confirm your acceptance of our revised Privacy Policy and all its terms, concepts therefore we advise you to review our Privacy Policy whenever you consult, access or use our website, so you are informed about our information practices and the choices available to you.