

# **PRIVACY POLICY AND GDPR**

Word Parade is responsible for the collection and processing of personal data which has been obtained digitally, particularly through the use of this website, undertaking to respect the privacy of users, thereby ensuring the confidentiality and security of the data received, in strict compliance with legislation in force.

This Personal Data Protection Policy describes our practices concerning the retention, processing of and access to personal information. By accepting, you are authorizing Word Parade to process your data, of which you acknowledge you are the data subject, as well as the data related to your commercial and contractual relationship and its management, under the terms of this text.

You further declare that you are aware and have been fully informed that the processing of your personal data, previously transmitted by you, includes all operations carried out by automated means or not.

In addition, you hereby state your knowledge of your rights to oppose, correct and/or request the "Right to Oblivion", regarding the processing of your Personal Data, by sending a request to an electronic address, as well as the right to submit a complaint to the competent authorities.

Please read the following terms and conditions carefully:

#### 1. PREAMBLE

This Personal Data Protection Policy, hereinafter referred to as "Protection Policy", is intended to inform you of the following points:

1.1 The commitments adopted by Word Parade regarding the Protection of Personal Data, under the terms of and in accordance with the General Data Protection Regulation, hereinafter referred to as "GDPR" (EU) 2016/679, concerning the protection of natural persons with regard to the processing of Personal Data and the free movement of such data, and;

1.2 Concerning the way in which Word Parade processes your Personal Data, in particular the Personal Data obtained in digital form, particularly through the website.

#### 2. DEFINITIONS

In the following framework, Word Parade shall provide the framework with the following definitions:



Definition of "Personal Data": refers to all information related to the Data Subject which enables him or her to be identified.

Definition of "Data Subject": an identified or identifiable natural person associated with the Personal Data. The user of the website is considered as the Data Subject as regards Word Parade. The natural person may be directly or indirectly identifiable or identified, including by their name, civil or tax identification number, location data, online identifiers (such as IP addresses and logs).

Definition of "Controller": internal entity that defines the objectives and means for Personal Data Processing.

Definition of "Subcontractor": an entity external to Word Parade which processes Personal Data in its name. The "Subcontractor" has entered into a confidentiality agreement with Word Parade, under which it undertakes to keep the information it processes confidential.

Definition of "Processing": any operation carried out within the scope of Personal Data, either through automatic means or not, such as the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or, alternatively, availability, harmonization or association, restriction, disposal or destruction. Personal Data Processing also includes any other operation provided for as part of the GDPR.

#### **3. COMMITMENTS UNDERTAKEN**

Word Parade guarantees complete protection of Personal Data in accordance with the rules set forth in the GDPR, with respect to all procedures and obligations therein, especially with regard to the Personal Data Processing of users of its websites and/or digital applications (e.g. visitors, job seekers, etc.). Word Parade has implemented digital tools and procedures in order to guarantee the effective protection of Personal Data.

In following up its compliance with GDPR procedures, Word Parade has adopted and implemented various internal policies and procedures aimed at raising the awareness of its employees, suppliers and partners, regarding the protection of Personal Data.



## **3.1. PRINCIPLES REGARDING THE PROTECTION OF PERSONAL DATA**

## **Personal Data Processing**

Word Parade undertakes to process your Personal Data in accordance with the following principles:

- Processing legally, impartially and transparently, to ensure the principles of legality, impartiality and transparency;

- Collection and processing for specific, explicit and legitimate purposes. Compliance with the principle of limitation of purpose, since data will not be processed differently in a manner incompatible with the purposes for which they were collected;

- Suitable collection and processing, relevant and limited to what is strictly necessary, taking into account the objectives for which the data is processed, thus respecting the principle of minimization of data;

- The Personal Data transferred must be correct, and should be rectified or updated when necessary or when considered as such.

#### **Security of Processing**

Word Parade has defined technical and procedural measures for the effective implementation of the principles of Personal Data protection, to comply with the GDPR, thus protecting the rights, freedoms and guarantees of Personal Data Subjects, starting from its collection and its subsequent Processing. It was decided to impose the same level of Personal Data protection level on all Subcontractors (service providers, suppliers, partners, etc.).

#### 4. PROCESSING OF PERSONAL DATA

## 4.1 HOW PERSONAL DATA COLLECTION IS CARRIED OUT

Word Parade carries out the collection of Personal Data on its premises and through its website and/or digital applications, where the user makes this available and explicitly consents to this, through specifying:

- Company Headquarters and Premises;

- When browsing the websites and/or digital applications of Word Parade (that is, technical information, such as IP addresses or logs, collected through cookies or similar technologies when authorized to do so);

- When subscribing to the newsletter provided by Word Parade;

- When participating in a competition, marketing programme, test or survey;

- When applying for a job at our premises or through our website;

- When entering comments or images on social network pages owned by Word Parade;



- When, in any other way, you send us information of a personal nature and agree to its storage and processing;

## 4.2. WHY THE COLLECTION OF PERSONAL DATA IS NECESSARY

## Management of the Customer/Applicant Relationship

Word Parade collects Personal Data concerning informational and administrative relations with customers and recruitment candidates and, in particular, to:

- Enable a request for information online, concerning services and job offers, on the website and/or digital applications;

- Enable recruitment actions;

- Enable immediate applications for all job offers to be made available on the website and/or digital applications;

- It will enable all recruitment candidates:

- to receive personalized job offers;
- to manage and update key aspects of their CVs;

- To obtain your opinion on services, in particular through surveys and tests;

- To enable participation in application processes, questionnaires or other marketing programmes;

- To set up statistical analyses, and financial and commercial studies for online traffic management purposes (e.g. to obtain usage levels for Word Parade's website and/or digital applications, as well as the relative importance of the services provided as a way of improving their capacity to be utilized);

- To send general information, job offers, promotional communication and/or advertising from Word Parade, particularly concerning services, news, campaigns and job offers that may interest the customer/applicant (provided this is subject to prior authorization, when necessary and respecting their right of refusal, in accordance with the legal requirements applicable to direct marketing for commercial purposes).

These notifications may be sent by email or through mobile service (telephone call, SMS and MMS).

## **Fighting fraud**

Your Personal Data will be treated in such a way as to prevent fraudulent situations involving third parties.

Information considered obligatory is marked with an asterisk in the online forms provided by Word Parade. Without completing these fields, the user's request for information and/or order cannot be processed. The provision of the remaining information is optional.



#### Management of Recruitment and Human Resources

Word Parade collects your Personal Data through a form available at the company's premises or on the respective website page, in order to analyse and respond to a job application. Should no action is taken by Word Parade with regard to the employment application, the Personal Data will be kept in accordance with the provisions set forth in the section on "Personal Data Storage Period".

## 4.3 LEGAL BASIS FOR PROCESSING

The operations carried out regarding Personal Data Processing for customers and/or job applicants for Word Parade, are based on:

- Your legitimate interest in the carrying out of services, protection of your activities or others, as well as in better identifying your preferences as a way of personalizing Word Parade offers to better match your needs;

- When the Processing is required by legislation in force;

- When explicit consent is acquired.

Word Parade may present a legitimate interest in carrying out recruitment operations to manage its activities in the best possible way, by collecting all data necessary concerning interested candidates.

In all cases, it should be noted that Word Parade only processes Personal Data if:

- Subjects have given express authorization for the processing of their Personal Data for one or more specific purposes;

- Processing is necessary for the proper execution of a contract to which they are a party;

- Processing is necessary to carry out the legitimate interests of Word Parade, except where these interests do not override the fundamental interests or rights of Data Subjects, especially where Data Subjects are children.

## 4.4 PERSONAL DATA STORAGE PERIOD

Word Parade keeps your Personal Data in accordance with the retention periods laid down by legislation and regulations in force, particularly taking into account your activities, storing them during the following periods:

- When you contact us to request information, we store your personal data for as long as necessary to process and carry out your request;

- We store your personal data used for direct marketing until you cancel such



authorization or request us to dispose of it under legislation in force. In such an event, Word Parade will only preserve the information necessary to guarantee its right of opposition in accordance with legal regulations and rules. - We keep your personal data associated with applications and CVs, which correspond to our actions and recruitment offers.

The cookies used by Word Parade are stored until you remove them from your browser.

## **4.5 PERSONAL DATA RECIPIENTS**

Word Parade employees responsible for managing customer and job applicants support (sales, recruitment and human resources departments) may only access your Personal Data on the basis of strict necessity. Word Parade does not share its Personal Data with third parties, except for service providers, in accordance with the provisions of the section "Security Measures and Subcontractors", especially for the purpose of combating fraud, payment management, storage, administration of Information Technologies and customer support provision.

Word Parade may transfer Personal Data to third parties in line with requests from public judicial authorities with legal powers for this purpose, in accordance with the legal regulations in force.

Word Parade guarantees the confidentiality and security of Personal Data during the transfer to the aforementioned recipients.

## **5. ABOUT COOKIES**

#### What are cookies?

Websites, applications and digital platforms may use cookies or similar technologies to enhance your browsing experience. Cookies constitute information stored on your personal equipment concerning the websites you visit. Sometimes they are stored in a plain text file, accessed by a server that reads and records the information.

Websites may only read and write cookies held by them.

#### Our use of cookies

While browsing our website, we use cookies to 'recognize' your browser only during your visit ("session cookie") or during all your visits ("permanent



cookie").

On our website, cookies are used for the following purposes:

- For technical reasons (identifying sessions, maintaining configurations or shopping carts, etc.), for example, to modify the presentation of the website, application or digital platform for your device;

- For statistical analyses and for online traffic management purposes, for example, to improve the utilization capacity of a website, application and digital platform and the relevance of our services;

- To redefine the target audience and provide you with marketing content on other websites;

- For geo-location purposes when using specific functions, such as recommendations of addresses of stores and products available at the nearest point of sale.

## **5.1. OTHER COOKIES**

## Third-party cookies

If authorized in your cookie settings (see the cookie settings section below), third parties (advertising agencies, internet analytics companies, etc.) will set up/read cookies when browsing our website/digital applications.

The use of these cookies is governed by such privacy policies.

These cookies are used by these companies during the working life of the cookies to determine and distribute relevant advertising content reflecting your main interests based on knowledge of your browsing habits on our website, applications and digital platforms.

## Social networks

To allow you to share content or comments about our products and/or services, our website may include social networking components (buttons, plug-ins, etc.).

These components are used by social networks to track your browsing habits and will only work if your browser is connected to the social network in question (but you do not have to use the "share" button, for example). The social networks you use determine the terms governing your use of the information they obtain, and Word Parade has no control over the use of this information. We recommend that you review their privacy policies, which will specify how they use this data and what you can do to increase the confidentiality of your account.

## Shared devices

Since cookies are linked to the device and the browser used, it is not possible



to determine the identity of the user of the device. Therefore, some services and advertising offered on this device may not match your use (the settings/browsing habits of other users of the device may influence the content offered).

You can choose the level of confidentiality of your device when deciding who can use it (individuals authorized to access the device) and change its settings (in particular, its cookie settings).

## **Cookie settings**

You can change your cookie settings at any time and there are several options available, as described below.

The settings you choose may affect your browsing experience and the operation of some services that require the use of cookies. In this regard, we reject any responsibility for consequences resulting from the limited operation of our services caused by the deactivation of cookies on your device (inability to define or read a cookie).

## **Computers (PC)**

You can manage cookies through various options in your browser settings, to allow or block cookies, in general or for specific actions, at any time. Cookies are managed differently in each browser.

Visit your browser's link to learn more:

Google Chrome https://support.google.com/chrome/answer/95647?hl=en Internet Explorer http://windows.microsoft.com/en-us/internet-

explorer/delete-manage-cookies#ie=ie-11

Mozilla Firefox https://support.mozilla.org/en-US/kb/delete-cookies-removeinfo-websites-stored

Safari https://support.apple.com/en-gb/HT201265

Edge https://privacy.microsoft.com/pt-pt/windows-10-microsoft-edge-and-privacy

For all other devices (smartphones, tablets, smart devices), see the help menu of your browser.

## 6. GOOGLE WEBFONTS

Word Parade uses Google Webfonts on its website to display all necessary content. In the event that your browser does not support Google Webfonts or prevents access to the website, all text information will be displayed in the default font.

The submitted data regarding website views will be sent to specific resource domains, such as fonts.googleapis.com or fonts.gstatic.com. Should the user be logged in to one of Google's services, for example, Gmail, when



simultaneously accessing the Word Parade website, the latter guarantees that it does not execute any association or connection in parallel.

## 7. GOOGLE ANALYTICS

Word Parade has implemented Google Analytics, a web analytics service from Google, Inc. ("Google") on its website. Google Analytics makes use of cookies, storing information regarding users' use of the website. The storage of cookies on Google's servers is solely for the purpose of evaluating the use of the website, compiling reports on web activities, and providing additional services related to the use of the website and the Internet. The IP address sent from your browser as a part of the information for Google Analytics will not be used inappropriately for other purposes.

## 8. SAFETY MEASURES AND SUBCONTRACTORS

Word Parade has implemented all appropriate technical and organizational measures to guarantee a level of security of Personal Data appropriate to the risk and, in particular, to protect Personal Data against destruction, loss, alteration, unauthorized disclosure or accidental or illegal access. The same level of protection is imposed by Word Parade on its Subcontractors. All employees of Word Parade who, during their work, may have access to your Personal Data, will keep this strictly confidential.

#### 9. EXERCISE OF YOUR RIGHTS

You may at any time, in accordance with the applicable rules regarding the protection of Personal Data, exercise your rights to access, rectify, delete and transfer your Personal Data.

You also have the right to object to the Processing of your Personal Data for the purpose of marketing and, therefore, to request that you stop receiving promotional communications from Word Parade at any time.

When the Processing is based on your express authorization, you have the right to revoke your authorization at any time.

In order to exercise your rights, especially with regard to the "Right to Oblivion" or deletion of your Personal Data, you can contact us at the following address: word.parade.translations@gmail.com

In order to enable us to respond to your request, you must provide us with the following identifying information: name, surname, email or address and any



other information necessary to confirm your identity.

You also have the right to complain to the Supervisory Authority in the event of the violation of the rules applicable to the protection of Personal Data, in particular that of the GDPR.

## **10. AMENDMENTS TO OUR PROTECTION POLICY**

The Personal Data Protection Policy may be changed by Word Parade at any time.

Word Parade may modify its Protection Policy (e.g. if it is intended to use your Personal Data in a way other than that stipulated in the Protection Policy in force at the time of the data collection), and this will be published without prior notice, through updating the relevant page of the Personal Data Protection Policy. Communication with customers will only be carried out if the changes so warrant.

For any questions or comments relating to our Protection Policy or the way in which Word Parade collects and uses your Personal Data and to exercise your rights related to your Personal Data which has been collected, please contact us at the following address word.parade.translations@gmail.com