

---

# DATA PROTECTION AND PRIVACY POLICY

## Commitment to Data Protection and Privacy

Wavenation, Conteúdos and Media Lda. (MEO Beachcam), implemented technical and organizational measures necessary to comply with applicable community and national legal rules in the field of data protection, privacy and information security, in particular those contained in the General Regulation on Data Protection.

## Responsible for the processing of personal data

Wavenation, Conteúdos and Media Lda., is an entity responsible for the processing of all personal data given to it to provide the services requested by the data subject or his/her legal representative.

## Collection and Processing of Personal Data

Wavenation, Conteúdos and Media Lda., processes the personal data strictly necessary for the provision of information, administrative procedures in the field of its attributions and competences and the dissemination of its activities, according to the interactions through the different service and communication channels .

The personal data collected by Wavenation, Conteúdos and Media Lda. are processed by computer, ensuring protection, privacy and security under the terms of the legislation in force.

## Legal Principles

All data processing operations are guided by fundamental and complementary legal principles within the scope of protection protection data and privacy, namely regarding its circulation, legality, loyalty, transparency, exclusivity, minimization, conservation, accuracy, integrity and confidentiality, with Wavenation, Conteúdos e Media Lda., available to demonstrate its responsibility before the data subject or any other third party that has a legitimate interest in this matter.

## Lawfulness and purpose of the treatment

The data processing operations carried out by Wavenation, Conteúdos and Media Lda. fall within one or more specific purposes, constituting a basis for legitimacy the consent of the data subject and the processing being considered necessary for:

- Registration for participation in a contest in which the data subject is the participant;
- Compliance with a legal obligation to which the controller is subject;

The personal data collected may, and eventually, be subject to processing for statistical purposes, for information dissemination or promotional actions and for communication actions, through direct communication, whether by correspondence, email, messages or any other electronic communications service.

However, prior information and the collection of express authorization for the latter purposes are always ensured, citizens may, at any time, exercise their right to oppose the use of their personal data for other purposes.

## Data Retention Deadlines

Personal data will be kept for the period necessary for the purposes that motivated its collection or further processing, in order to comply with all legal regulations applicable to the archive.

## Communication of Data to Other Entities

The provision of information, through the various service and communication channels, may eventually imply the use of services from third-party subcontracted entities, which may imply access by these entities to personal data.

In these circumstances and whenever necessary, Wavenation, Conteúdos and Media Lda. will only resort to contracting entities that present sufficient guarantees of execution of technical and organizational measures adequate to the satisfaction of the applicable norms, such guarantees being formalized in a contract signed between Wavenation, Conteúdos e Media Lda., and each of these third parties.

## Data Recipients

Except in the context of compliance with legal obligations, in the case of any communication of personal data to third parties that are not subcontracted entities or legitimate recipients, also not being carried out any communication for purposes other than those mentioned above.

## Security Measures

Taking into account the most advanced techniques, application costs and the nature, scope, context and purposes of the processing, all entities that are its (sub)contractors implement the necessary technical and organizational measures to ensure a level of risk-appropriate security.

For this purpose, various security measures may be adopted to protect personal data against its dissemination, loss, misuse, alteration, treatment or unauthorized access, as well as against any other form of illicit treatment.

In view of the need to subcontract services to third parties that may have access to the personal data of the holder of the data, the subcontractors of Wavenation, Conteúdos and Media Lda., will be obliged to adopt security measures and protocols, as well as well as other measures of a technical nature adjusted to protect the confidentiality and security of personal data, to prevent unauthorized access authorizations, loss or destruction of personal data.

---

### **Exercise of the Rights of the Subjects of Personal Data**

They may, as holders of personal data, at any time, exercise their data protection and privacy rights, namely the rights of access, rectification, deletion, portability, limitation or opposition to treatment, under the terms and with the limitations provided for in the applicable standards.

Any request to exercise data protection and privacy rights must be addressed to Wavenation, Conteúdos e Media Lda., in writing, by the respective data subject, in accordance with the procedure and contact described below.

### **Complaints and Suggestions**

Data subjects have the right to file a complaint, either by registering in the Complaints Book or by submitting a complaint to the regulatory authorities.

They may also make suggestions via email sent to the following address: [rgpd@beachcam.pt](mailto:rgpd@beachcam.pt)

### **Incident Report**

Wavenation, Conteúdos and Media Lda., appointed a Data Protection Officer and proceeded with the implementation within the scope of the protection of data, privacy and information security.

#### **Data Protection Officer:**

Priscila Vilhena Ganga

[rgpd@beachcam.pt](mailto:rgpd@beachcam.pt)

+351 93 509 9001

If the data subjects wish to communicate the occurrence of any situation of violation of personal data that causes, accidentally or unlawfully, the destruction, loss, alteration, disclosure or unauthorized access to personal data transmitted, stored or subjected to any other type of treatment, you can contact the Data Protection Officer in accordance with the instructions and contact described above.

### **Privacy Policy Change**

Wavenation, Conteúdos and Media Ltd. may, at any time, make the changes it deems appropriate to this Privacy Policy. Data Protection and Privacy, in order to guarantee the respective updating, development and continuous improvement, these changes being duly announced publicly in order to guarantee transparency and information.