



## PRIVACY POLICY

DOLEV HOLDINGS GROUP cares about your privacy and is committed to protecting your personal data. This privacy statement will inform you about how DOLEV HOLDINGS GROUP uses your personal data, your privacy rights and how the law protects you. Please read this privacy statement carefully before using our website.

### A. DOLEV HOLDINGS GROUP

The main responsible for your data is DINAMANOR, Lda., a company with registered office at Rua das Mercês, no. 41, Funchal, in the Island of Madeira, legal entity number 518112993 (hereinafter collectively referred to as “DOLEV HOLDINGS GROUP”, “we”, or “us”, or “our” in this Privacy Policy). DOLEV HOLDINGS GROUP is considered responsible for processing data.

### B. Data collection

#### 1. Information provided in the context of the Questions and Comments Box

1. Upon providing your data to utilize our Questions and Comments Box, we may collect the subsequent details about you:
  - a. Your name
  - b. Your e-mail address
  - c. The content of the comment left in the Box
2. DOLEV HOLDINGS GROUP’ services are not intended to be used by minors, therefore DOLEV HOLDINGS GROUP doesn’t knowingly collect data from people under the age of 18.

#### 2. Automatically collected data

1. When utilizing our website, the following information about you is automatically collected:
  - a. We gather specific details about your device, including your IP address, device language settings, brand, type, operating system version, browser type and version, and specific details about the device's software such as fonts, system time zone, and available video and audio formats.



## PRIVACY POLICY

- b. Depending on your device's permissions, when you post a comment on our website, we automatically collect and process information regarding your current location. If DOLEV HOLDINGS GROUP requires location data, we will present you the option to authorize or decline access to your location. If you choose not to grant us access to your location, you can still use our website, though with limited functionality.
- c. Technical particulars, including your device's Internet Protocol (IP) address, time zone, and operating system, are stored. Additionally, your browser type and version, are recorded.
- d. Information regarding your activity throughout our website is collected, encompassing the websites from which you accessed our platform, timestamps of each visit, performed searches, clicked advertisements or banners, interacted with ad listings, duration of visits, and the sequence of content visited on our website.
- e. We use cookies to manage store preferences, preferred language, and display relevant advertisements. Cookies can collect data such as the date and time of your visit, browsing history and preferences. You have the option to refuse all or some cookies. However, disabling or refusing cookies may result in certain parts of our website becoming inaccessible or malfunctioning.

### **C. Communication on the website**

1. When utilizing our Questions and Comments Box to communicate with us, we collect and process the content and information that you choose to share through this function.
2. Should you agree to participate in interaction studies occasionally conducted by DOLEV HOLDINGS GROUP, we will record your interaction with our team. For each study organized by DOLEV HOLDINGS GROUP, we will provide you with detailed information regarding the processing of your personal data and its purpose.
3. DOLEV HOLDINGS GROUP can present User surveys to assess satisfaction with the quality of our services. Additionally, the User may choose to provide us



## PRIVACY POLICY

with contact details. Please note that any personal data voluntarily provided by you may occasionally be included in the information you provide to us.

### **D. Use of personal data**

1. We utilize your personal data only in accordance with legal provisions. Primarily, we use your personal data under the following conditions:
  - a. When it serves our legitimate interests, provided they do not take over your personal interests or fundamental rights and freedoms. This may include enhancing our services and ensuring their security.
  - b. To comply with legal or regulatory mandates.
  - c. Under specific circumstances, we may process your personal data based on your explicit consent. Should this occur, we'll notify you regarding the purpose and type of personal data we intend to process when seeking your consent.
2. We utilize clickstream data to achieve the following objectives:
  - a. Personalize content for you, such as offering relevant search results based on your usage of our website.
  - b. Understand your browsing habits and interests by analyzing the time you spend on our platform, enabling us to enhance our website and provide tailored suggestions based on your interaction with content.
3. Should you opt to share your location with us, we leverage it to compile anonymous and aggregated data to analyze the characteristics and behaviors of the website Visitors, aiding in commercial analysis.
4. To ensure the safety and security of our website, we can also utilize your e-mail address, and specific device identifiers for various purposes, including administration, troubleshooting, data analysis, testing, fraud prevention, system maintenance, support, and data hosting.
5. We also access and analyze the messages left in our Questions and Comments Box by Visitors to enhance product visibility and Visitor experience, employing machine learning models and algorithms for automated content analysis. Measures are taken to protect personal data, though there may be instances where personal data is inadvertently revealed.



## PRIVACY POLICY

6. We may occasionally post some of the users comments in our website, disclosing the corresponding name and country, if applicable.
7. We may also occasionally conduct visitor surveys to evaluate satisfaction levels with our services. Participation in surveys may involve providing contact details for follow-up communication or participation in visitor experience tests or interviews.
8. Your e-mail exchanges with our customer support or sales team are saved, contingent upon your explicit consent.
9. All the aforementioned data processing activities are conducted to maintain a safe and effective website.

### **E. Changes to our Privacy Policy**

1. Our privacy policy may undergo revisions and updates periodically. We will notify you of significant changes to this statement as necessary and in compliance with relevant laws.

### **F. Your rights**

1. In certain situations, you possess rights under data protection regulations concerning your personal information. Kindly reach out to DOLEV HOLDINGS GROUP if you wish to exercise any of these rights outlined below:
  - a. Right to request access to your personal data. This enables you to obtain a copy of the personal data we hold about you and verify its lawful processing.
  - b. Right to request correction of any inaccuracies in your data. This allows you to rectify any incomplete or incorrect data we hold about you, though we may need to verify the accuracy of the updated information.
  - c. Right to request restrictions on the processing of your personal data. You can request suspension of the processing of your personal data in various scenarios, such as if you wish to rectify your data, if we unlawfully process your data, if you require us to retain your data for legal reasons, or if you have objected to our use of your data pending verification.
  - d. Right to request erasure of your personal data. This allows you to request the deletion of your personal data if there are no legitimate reasons for us



## PRIVACY POLICY

to continue processing it. Please note that certain legal obligations may require us to retain your data.

- e. Right to object to the processing of your personal data, particularly if based on legitimate interests or for marketing purposes.
  - f. Right to request the transfer of your personal data to yourself or a third party in a structured, commonly used, and machine-readable format, applicable to automated information or instances where we have processed data based on your consent or contract.
  - g. Right to withdraw your consent to the processing of your personal data at any time. This does not affect the legality of any processing carried out before the withdrawal.
2. We aim to respond to all legitimate requests within one month. However, complex or multiple requests may demand a longer response time, in which case, we will notify and keep you informed accordingly.
  3. The Visitor has the right to lodge a complaint with the relevant data protection authority. However, we appreciate the opportunity to address your concerns internally before involving external authorities. Please reach out to DOLEV HOLDINGS GROUP at Avenida da República, nº 74, 2º Andar, 4580-193 Paredes, Portugal.

### **G. Sharing your personal data**

1. We may need to disclose your personal information to the parties outlined below for the purposes outlined in this privacy policy.
2. We enlist third-party services to assist us in delivering specific aspects of our website and to oversee and monitor its operations. As part of this arrangement, your personal data may be shared with the following entities or categories of entities:
  - a. Providers of integrated tools may receive your location data to enhance our website's performance and tailor content for you.
  - b. Customer support tool providers may receive certain data such as email address details and customer support inquiries to facilitate communication with our support team.



## PRIVACY POLICY

- c. Providers of customer relationship management tools may receive email address details and sales prospect contact information for processing by our sales team.
  - d. Marketing communications service providers may receive certain data to organize and execute marketing communication campaigns.
3. These third-party service providers may be situated within or outside the European Economic Area (EEA). We vet our third-party service providers and mandate them to uphold the security of your personal information and handle it in accordance with the law. We prohibit them from using your personal data for their own purposes and only allow them to process it for specific purposes and as per our instructions. In case we transfer your personal data outside the European Economic Area (EEA), we ensure a comparable level of protection by guaranteeing that we only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection.
4. Mergers and Acquisitions: In the event of (partial) reorganization, sale, transfer, or merger of our business or assets into another entity, your personal data may be disclosed and transferred to the new business owners. We will adhere to legal requirements in such cases, which may include notifying you.
5. We may disclose your personal information to law enforcement agencies, regulators, government bodies, and other relevant third parties in compliance with legal or regulatory obligations.

### **H. Data Storage Location and Duration**

1. The information we gather about you is stored and processed both within and outside the European Economic Area (EEA) on secure servers, aimed at enhancing user experience.
2. We retain your personal data solely for the duration necessary to fulfill the purposes for which it was collected, which includes meeting legal, tax, accounting, or reporting requirements.
3. Data associated with cookies is maintained for the duration of the cookie's lifecycle or until you choose to delete it.



## PRIVACY POLICY

4. All information received about you is securely stored on servers, and we have implemented necessary and appropriate technical and organizational measures to safeguard your personal data. Please note that, despite the measures in place to protect your data, transferring data over the Internet or other open networks is never entirely secure, and there is a risk that third parties may gain access to your personal data.
5. Our website may include links to third-party websites or applications. It's important to note that each of these links has its own privacy policy. We do not control these websites/applications nor are we responsible for their policies. When navigating away from our website, we encourage you to review the privacy statement of each website you visit.

### **I. Contact:**

1. For more information on how to exercise your rights, you can contact us by e-mail to the following address: [info@dolev.eu](mailto:info@dolev.eu)

### **J. Data Protection Authority**

1. If you have a complaint regarding data protection, you have the option to contact the data protection authority. You may exercise this right by reaching out to the authority in your residential or work area, or in the jurisdiction where the data controller is located. In Portugal, the relevant data protection authority is:

CNPD - National Data Protection Commission

Rua de São Bento, nº 148 - 3º

1200-821 Lisbon

Telephone +351 213928400; Fax: +351213976832

Website <http://www.cnpd.pt>