BiG BANCO DE INVESTIMENTO GLOBAL

INFORMATION DOCUMENT ON PERSONAL DATA PROTECTION

I – INFORMATION DOCUMENT ON PERSONAL DATA PROTECTION

Compliance with legislation on personal data protection and respect for the rights that Clients and other interested parties have regarding personal details is a priority for BiG. In short, one may say that BiG understands that the way in which it handles personal details should be oriented to serve its Clients and to be able to provide personalised services that offer them added value. Regardless of a client's relationship with BiG, other holders of personal details, like Employees, Shareholders, suppliers and other people with whom BiG interacts occasionally (visitors to BiG's website or recipients of promotional campaigns) can expect a high level of protection from BiG and respect for their rights regarding personal details.

In this regard, BiG has adopted a number of technical and organizational measures that are aimed at ensuring that the relationship established with Clients and other interested parties ensures a high level of protection and respect for applicable legislation.

Personal details are any information relating to an identified or identifiable natural person (hereinafter "data holder").

In this regard, an identifiable person is considered to be a natural person who can be identified, directly or indirectly, especially by reference to an identifier, like for example a name, identification number, location data, electronic identifiers or to one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of this natural person.

This document aims to provide information on the way in which BiG treats personal details (any operation on personal details, including their access, collection, conservation, organization and use until deletion) of its Clients and other interested parties, and on Clients' rights relating to the treatment of personal data pursuant to legislation on data protection, in particular the **General Data Protection Regulation**. Anyone interested can find a full version of the **General Data Protection Regulation** at the following link:https://eur-lex.Europe.l/legal-content/PT/ALL/?uri=celex%3A32016R0679

1. Who is responsible for the treatment of personal details, and who may be contacted in BiG on aspects related with the treatment of personal details, including the exercise of rights?

BiG itself is responsible for the treatment of the personal details of its Clients and other interested parties. BiG's contact details are the following:

Banco de Investimento Global, S.A.
Av. 24 Julho N.74-76
1200-869 Lisbon – Portugal
T +351 213 305 300 F +351 213 152 608
www.big.pt

BiG has appointed a Data Protection Officer who can provide clarifications on personal data protection and receive complaints. The Data Protection Officer's contact details are the following:
Data Protection Officer
Av. 24 Julho N.74-76
1200-869 Lisbon – Portugal
T +351 213 305 300 F +351 213 152 608
www.big.pt
E-mail address: dpo@big.pt.

2. What personal details are gathered by BiG and where are they gathered from?

BiG collects, records, conserves, uses, communicates the personal details of its Clients by automated and/or non-automated means — including the elaboration of a personal database or definition of a profile — at least for the whole time that a contractual relationship between BiG and its Client lasts or longer, if imposed by law or for the legitimate interests of BiG or of third parties. BiG can also collect and use personal details of data holders who are not Clients, as is explained in greater detail below.

For example:

The personal details of its Clients, which BiG can keep and use in different contexts, are, among others:

- name;
- name;
- photograph;
- identification number (Citizen's Card; Taxpayer Number; Legal Entity Identifier (LEI) number when applicable to natural persons; Passport, etc.);
- address of the habitual or professional residence, e-mail or telephone;
- the Client's voice;
- the Client's preferences, like a hobby, for example;
- video images, taken by the video-surveillance system;
- A record of the Client's behaviour (an instruction given; a financial movement in their bank account; the history of searches on the website);
- information or note on incidents in the bank account;
- an IP address of a computer that the Client usually uses;
- data on their mobile device;
- the record of a complaint;
- information on the credit rating, investor profile, money laundering / financing of terrorism risk rating, etc.), etc.

BiG classifies the personal details of its Clients into the following categories:

Identification details: these can include the name, complete or abbreviated; nickname; gender; date of birth/age; civil status; Citizen's Card number; Social Security number; passport number; other number issued by a competent authority (tax number; driving licence, NHS number, etc.); nationality; lifestyle and social circumstances; academic titles; images of Citizen's Card, of passports, of driving licences and signatures; authentication data (passwords and visual and facial recognition); photographs, video images and records of personal appearance and behaviour.

Family data: this can include the name and contact details of family members or dependents or information relating to the composition of the household.

Contact data: this can include address, telephone number, e-mail address, social media profile details.

Employment data: this can include the sector and area of activity; hierarchical position; name of current employer and of previous employers; professional address; work telephone number, professional e-mail address; and details of social media profiles related with the profession.

Data on qualifications: this can include data on vocational and academic training.

Financial data: this can include billing address; bank account number; credit or debit card numbers; name and information of the data holders of accounts or of bank cards; records of instructions; records of transactions or data of counterparties.

Declarations and opinions: this can include any declarations, in the form of an exposition, complaint or any other that BiG may receive or that is published about BiG, including on social networks.

Electronic tagging details: this can include IP address; cookies or similar technologies; activity records; online identifiers; unique device identifiers; location data, etc.
BiG will handle the Client's personal details as

strictly confidential within the terms of the legal and regulatory rules applicable, having adopted technical and organizational measures so as not to allow— within its possibilities and responsibilities — their third parties to make undue use of them and conditioning the cession or transmission, when legally possible, to the express acceptance, by the assignee, of the obligation to confidentiality mentioned above.

The personal details to which BiG has access are mostly those that have been provided by the Client in the context of the commercial relationship that is established with BiG:

a) in the process of opening the account and concluding the account opening contract (CGAC);

b) from the accesses, consultations, orders, instructions and other records relating to diverse products and services marketed by BiG and that are acquired or subscribed by the Client, among which are term or demand deposits, payment services, bank cards, deposit and custody of financial instruments, reception, transmission and execution of orders, portfolio management, consultancy for investment, life assurance associated to financial instruments; pensions funds, investment funds, automobile, consumption or investment financing contracts, etc.;

c) those provided by the Client by filling in the questionnaire on suitability in conformity with the Markets in Financial Instruments Directive and with national legislation ("MiFID Questionnaire");

d) interactions with the Client, namely meetings, telephone calls or electronic communications, can result in information not specifically related with the contract, for example on non-vocational activities or interests and which BiG can record in determined cases.

For example:

(i) on entering contracts with BiG, including the general conditions governing the opening of accounts, the Client provides diverse personal information, such as his/her name, address, e-mail address, telephone number (Client's contact information), gender, nationality, place of birth, parentage, taxpayer number, tax residence, civil status, professional situation, name or designation of the employers, legal capacity, and also authentication data, like authorised signature.

For proof of identity, the Client delivers a copy of their citizen's card or passport or other suitable document to BiG.

For proof of the address and professional situation, the Client also delivers to BiG a pay slip, employers' declaration, or invoice issued by a service provider and sent to their address. In the case of opening an account by digital means, the Client records a video interview which BiG keeps in its possession.

(ii) Based on the instructions given to BiG, relating to the bank accounts or products and services acquired, BiG gathers and keeps information on the means used to communicate instructions, including the Client's voice with the recording of calls, or the archive of e-mail messages, information on account balances, amounts of transactions, beneficiaries, amounts of payments, financial instruments held or transferred, events related with Clients' financial instruments, and diverse situations that can affect balances or financial instruments, such as inventories, liens, pledges, cancellations, impediments, interest rates applicable, etc.

(iii) in filling in the MiFID Questionnaire the Client also provides personal information relating to their financial and patrimonial situation and on their investment knowledge or objectives.

(iv) based on the use of bank cards, debit or credit, or other means of payment, BiG gathers information on the amounts of transactions, the beneficiary and the amounts of the payments, the location of the terminals where cards were used, etc.

(v) conversations held in a meeting, or business card delivered in a meeting, can result in information that the Client is interested in a particular sport, for example that s/he participates in golf tournaments or belongs to a sports association.

From the use that a user makes of On-Line Access or of BiG's website information relating to the Client is collected automatically and registered on the server, like specific information of the device, for example, hardware model, version of the operating system, device identifier, and also information from the mobile network, including the mobile phone number. When the Client uses the On-Line Access or the website, BiG automatically gathers and stores some information recorded on the server on the Internet Protocol (IP) address or cookies and similar technologies that allow information on the interaction that the Client had in relation to BiG's services and that are associated to the Client's identity to be collected.

We also **obtain and treat personal details of Clients from publicly available sources**, like for example, from debtors directories, from the Credit Liabilities Centre, commercial or property records, publication of corporate acts, records of insolvency, press, media, Internet, social networks (or rather, BiG can obtain information from profiles on social networks, in as much as they are publicly visible), databases of terrorists or people who are politically exposed.

We can also **receive personal details of Clients from the activity of third parties**, for example from distributors from whom the Client may have acquired our products or services or from competent authorities.

Other Client's personal details **are originated in BiG's own activities**, as it can draw up and record observations resulting from the interaction with Clients or use information which it may have accessed to derive other information relating to the Client, including the **definition of a Client profile**, for example, to categorise him/her as an investor, to define their patrimonial classification and include them in a group of Clients, to define their credit risk; to define their risk of money laundering and financing of terrorism, among others situations of "profile definitions" that can occur.

BiG also gathers and uses personal details of people who are not Clients, for example in the following cases:

(i) Potential clients and visitors, whose identification details and other data of use (name, address, e-mail address, telephone number; identification number) we can access from the use of BiG's website, participation in events that produce lists of participants; from visiting our installations; through account opening processes that were not concluded; from marketing campaigns contracted with marketing companies; and from communications made by our Clients (for example, as part of a campaign, or related with the execution of contracts with Clients, in relation to legal representatives, attorneys, guarantors, etc., who are not our Clients);
(ii) **Employees**, within the scope of the contractual relationship established.

3. Is there a legal obligation to provide BiG with personal details?

Within the scope of the contractual relations established between BiG and its Clients, the Client will have to provide a number of personal details that are indispensable for the formation of BiG's contractual intent and, later, the execution within the terms contracted. As a general rule, one may say that without access to basic information, which will depend on the contract that is to be entered into on a case by case basis, BiG could not decide whether to conclude the contract, and entering the contract without this information, or its supervening omission, would make the contract impossible to

carry out, and so BiG would have to terminate it.
In particular, BiG is subject to the duty of identification of Clients and the filing of information on identification, resulting from legislation on money laundering and the financing of terrorism, which require banks to verify the identity of Clients before establishing commercial relations. In order to be able to enter into a contractual relationship with BiG, the Client will necessarily have to provide to BiG:
i) photograph
ii) full name;
iii) signature;
iv) date of birth;
v) nationality as per the identification document;
vi) type, number, date of validity and issuing body of the identification document;
vii) taxpayer number or, when no taxpayer number is available, the equivalent number issued by the competent foreign authority;
viii) profession and employer, if any;
ix) full address of the permanent residence and, when different, of the tax residence;
x) place of birth;
xi) other nationalities not given in the identification document.
Other information on the Client may be, in accordance with the law, an essential condition for being able to provide a service, for example, like information on the Client's knowledge, experience, investment goals and capacity to bear losses, which is essential for being able to provide an investment consultancy or portfolio management service and, to a certain extent, to receive, transmit and carry out orders. Without this information BiG will not be able to provide these services.
Some information can also be essential to be able to use certain data-processing functions made available by BiG, without which they will not work.
In cases where the information is indispensable for the conclusion of a contract, provision of a service or use of an app made available by BiG, the Client will be informed.

As a general rule, one may say that anything that is not essential for the conclusion of the contract or provision of a service by BiG — whether by legal imposition or the legitimate interest of BiG — will not be required to be provided to BiG. The communication of personal details depends entirely on the Client's option.
Likewise, if no contractual relationship is established, the personal details that third parties notify to BiG, and of which they are the data holders, will not be under a legal obligation and failure to communicate these does not have any consequence for third parties. The communication of personal details is entirely up to the holder.

4. Why does BiG treat the personal details of Clients (purpose of the treatment) and other data holders? What are the legal grounds for the treatment?

BiG informs the Client that it is legally authorised, regardless of the Client's consent, to:
(i) treat the Client's personal details necessary for the execution of the contracts concluded with BiG or for pre-contractual diligences on request;
(ii) treat the Client's personal details necessary to fulfil legal obligations to which BiG is subject;
(iii) treat the Client's personal details necessary for the purpose of the legitimate interests pursued by BiG or by a third party, except if the Client's fundamental rights and liberties prevail.
All other treatment of personal details and other purposes of the treatment that do not come within the previously defined scope depend, for their legality, on the Client's consent, which should be manifested freely, specifically, explicitly and on an informed basis. This means that in all the treatment of personal details that exceeds the scope identified in this paragraph, the Client can always refuse consent, where such consent is not a requisite for the conclusion of an account opening contract or any other contract with BiG. On the other hand,

consent that may have been provided at any given time can always be withdrawn.

BiG treats personal details with very diverse **purposes** and on different **legal grounds:**
a) To allow the conclusion, execution and management of the contractual relations established with the Client, including the realization or management of related operations

For example:

- The contact data provided by the Client upon the opening of an account or on the acquisition/ subscription of a product or service are kept for the whole time the commercial relationship lasts, in order to be able to prove the conclusion of a contract, identify the counterparty, authenticate instructions, and send communications and notifications of a contractual nature.
- BiG also records and keeps, on magnetic tapes or on any other appropriate support, for the maximum period legally admissible and/or obligatory, all the telephone conversations between the Client and BiG, written instructions received, e-mail messages, for the purpose of its internal record and proof of the orders or other communications received, and also for use as evidence in court, as necessary.
- Depending on the contract that is concluded, its execution can imply that BiG may receive a Client's personal details kept by another person or entity responsible for their treatment. For example, an investment consultancy service or information relating to the Client's overall financial position implies access to information obtained from other financial institutions.
In this case, the execution of the contract implies consent for obtaining and treating the personal details, and this consent will last for the whole time that the contract remains in force.
- BiG may also have to transmit the personal details of Clients to third parties to execute contracts that it concluded with the Clients or instructions conveyed to it, in as much as this transmission is a condition sine qua non for the execution of these contracts or of these instructions, as happens, for example, in the transmission to third parties of orders received, whenever BiG cannot execute them; in the communication of orders and information related to trading platforms, to central securities depositories or central counterparties; in the transmission to sub-custodians on which financial instruments are traded on international platforms; in the communication to registered interested parties of the pre-contractual information made available on platforms that it makes available; in the communication to management companies or attorneys of the Client's banking information, at the request of the Client; in the declaration of bank references, etc.

b) Fulfilment of applicable legal or regulatory provisions and performing BiG's business For example:

- BiG is legally obliged to obtain diverse documentation that enables it to identify its Client and may have to perform thorough due diligence on the Client and the origin of their estate, by imposition of legislation on combating money laundering and the financing of terrorism, so that BiG may have to access publicly available information on the Client, and also request receipt of diverse information;
- BiG has the legal duty to know its client in order to comply with obligations related with the defence of the financial system and of the securities market, so that it should be able to access publicly available information on the Client, and also request receipt of information;
- BiG defines profiles and diverse categorizations of the Client in order to meet legal obligations, namely (i) categorization of the Client to verify that the character of certain investment services is suited to their profile (for example, execution of and orders on financial instruments or the provision of investment consultancy or portfolio management services; (ii) definition of the appropriate target market for

banking products produced and/or distributed by BiG; (iii) the definition of the level of banking debt based on which the concession of credit will not be suitable for the Client;

- Pursuant to Law, the contracting of credit operations, whether potential (or rather, in which the use of the amounts contracted did not yet occur) or effective; the provision or contracting of guarantees; and the non-fulfilment of the said operations, including the balances relating to the last day of each month, of the responsibilities, effective or potential, arising from credit operations granted; overdrafts; assets operations with natural persons and the guarantees provided to and received by the Client; identification of the debtor, the level of responsibility, the situation of the credit (potential or effective) and other information contemplated in applicable legislation, will be obligatorily conveyed to the supervisory authorities or to other identified entities, namely to the Bank of Portugal for the purposes of the entering or update of the information system that it manages called the "Credit Liabilities Centre";

- BiG may also have to provide information relating to the Client to diverse competent authorities, national or international, to fulfil obligations related with criminal proceedings, the investigation of money laundering and financing of terrorism, judicial procedures, or of a fiscal nature, whenever the law so imposes. In this regard, data relating to information on accounts, balances and operations, will be conveyed to the Tax and Customs Authority; to the North-American tax authorities, in conformity with the Convention between the Portuguese Republic and the United States of America (USA) to avoid Double Taxation and to prevent Tax Evasion with regard to Income tax and in the Foreign Account Tax Compliance Act (FATCA); and, also, to any authorities with regard to the obligations assumed by the Portuguese Republic with regard to the automatic exchange of information of financial accounts on residents in other jurisdictions that are not part of the European Union, when there is an obligation to automatically exchange information arising from the convention or other international legal convention concluded with this jurisdiction, in the terms of which the latter should provide the information specified in the Common Reporting Standard, or CRS.

c) Pursuance of BiG's legitimate interests

For example:

- BiG may have to transmit the personal details of Clients to third parties, using contractually ensured adequate safeguards, and respecting the rules of banking secrecy, whenever this is imposed by the way in which it has structured its activity and organization and depending on the contractual partnerships established.

For example, BiG can use outsourced services for physical document archiving or outsource computer systems for the electronic filing of data or service provision (cloud computing);

- BiG may use the contact data to which it had access pursuant to a contract concluded with Clients for the purposes of communication to the Clients of products and services made available by BiG, without prejudice to the right of opposition of the Client who does not want to receive these communications;

- BiG may use the data of the history of interactions with the Client or third parties, of their bank accounts, or of the MiFID Questionnaire, for the purposes of assessing and minimising the risks of contractual non-compliance and of counterparty credit, related with proceedings to prevent or investigate fraud (including the viewing of images taken by the video-surveillance system) and, in more general terms, to ensure the efficacy of its internal control system;

- BiG may use the data of the history of interactions with the Client, of the use of the online services and of the website, of their bank accounts, or of the MiFID Questionnaire, including the definition of profiles and diverse categorizations of Clients, to increase the quality of the service provided to the Client, adapting and personalising products and services to their personal characteristics, and also the publication of their offer, for example directing specific content of BiG's site to the Client or allowing third parties access to information on the use of the site for the purpose of marketing BiG's offer on other websites;

- BiG may use some personal information of the Client to which it may have had access and which it may have registered, of a non-intrusive character, to send an offer to the Client corresponding to their personal tastes, for example, to invite them to participate in a sports competition that it is sponsoring;

- BiG can also use personal details to pursue the legitimate interests of the Client, namely the obtaining of exemptions or tax benefits associated to the financial instruments registered or deposited in his/her Accounts.

d) Consent

Whenever there are none of the legal grounds mentioned above, the treatment of Client's personal details depends on the **Client's consent** or that of other data holders of data treated by BiG. In this regard, the Client may have authorised BiG at the time of the opening of the account:

- to be able to use contact data and keep it in specific databases with the objective of promoting and divulging BiG's products and services to its Clients;

- to access and record specific information of the device used by the Client in order to access online services or use the website, for example, hardware model, version of the operating system, device identifier, and also information from the mobile network, including the mobile phone number, the Internet Protocol (IP) address or cookies and similar technologies;

- to record and use information relating to the Client, even when this is not imposed by law, which allow BiG to have a more complete picture of the Client's personal and financial situation (for example, how many children the Client has or which other Banks s/he has bank accounts with) in order to send personalised offers of products and services;

- to cede or transmit, within the limits of the law, to any company that is, directly or indirectly, in a control or group relationship with BiG (BiG Group), even outside of the Space of the European Union;

- without prejudice to what was mentioned previously regarding the possibility of the use of other grounds, to the exchange of information on credit risks with legally qualified institutions on credit risk;

- to take decisions in relation to them exclusively based on the automated treatment of personal details, including the definition of profiles;

- to treat biometric data so that it is possible to identify them whenever these biometric data are used to identify the Client in the conclusion of contracts with BiG or to identify them in the context of the execution of these contracts, namely in the communication of instructions.

In relation to **potential clients**, as previously defined, the maintenance of information on identity and contacts and its use in communications for the purpose of marketing, regardless of the means used, always depends on his/her **consent.**

Onboarding: treatment of data with the purpose of contracting new clients and the fulfilment of BiG's internal policies and procedures for the onboarding of clients.

AML/KYC: treatment of data with the purpose of meeting legal obligations in terms of identification and diligence before establishing a client relationship or making transactions with clients or potential clients.

Risk management: treatment of data necessary to exercise the function of the management of the risks to which BiG is subject.

Investigations: treatment of data necessary for the purpose of the detection, prevention and investigation of situations of non-fulfilment of internal policies and situations of fraud.

Security: treatment of data to ensure the physical security of BiG's installations (including records of visits to BiG's installations and records of video-surveillance cameras) and security of the computer system (including access records and details of access to the computer system).

Recruitment: treatment of data for the purposes of the recruitment process for hiring Employees.

Employment relationship: treatment of data for the purposes of the execution of the employment relationship, including records of working and non-working times and payment of salaries.

Health and safety: treatment of data necessary to comply with legal obligations in terms of health and safety at work.

Legal compliance: treatment of data necessary to ensure that BiG meets the legal obligations to which it is subject.

Legal procedures: treatment of data necessary to exercise the rights to which BiG is entitled.

Financial management: treatment of data for the management of suppliers, fulfilment of fiscal obligations, management of BiG's financing, accounting records and financial audit.

Market studies: treatment of data for the purposes of the elaboration of market or customer satisfaction studies with the objective of obtaining reactions to BiG's products and services.

Marketing/prospection: treatment of data for the purposes of communication with clients or potential clients (including e-mail, telephone, SMS messages, posts in social networks, or personal communications, and to maintain and update contact information for these purposes.

Governance of products and services: treatment of data necessary for the purpose of identifying relevant questions related with the products and services produced or marketed by BiG. Planning of improvements in the products and services. Production of new products and services.

Products and services: treatment of data necessary to execute and administer contractual relations established between BiG and its Clients and related tasks. Including communications established apropos these relations and services.

Credit rating: treatment of data for the purpose of assessment of the counterparty credit risk, above all by conducting financial due diligence.

Operation of websites: treatment of data necessary for the purposes of the operation and management of BiG's websites and applications, to provide content, advertising and other information and communicate and interact through websites.

Management of information technologies: treatment of data necessary for the management of BiG's communications system, operation of security on IT systems and audits on these systems.

5. Who can access the personal details?

In relation to the personal details that BiG keeps in its possession, these may be accessed by BiG's

Employees who may need to access them for the purposes of treatment mentioned above.
In this regard, BiG has adopted technical and organizational measures to limit access to the indispensable minimum, on a need to know basis, with the objective of maximising security as far as possible in relation to these data.
As mentioned above, BiG may also have to provide information relating to the Client to diverse competent authorities (for example, the Securities and Exchange Commission, Bank of Portugal, the Public Prosecutor's Office, criminal police offices, etc.), national or international, in order to fulfil obligations related with criminal proceedings, the investigation of money laundering and financing of terrorism, judicial procedures, or of a fiscal nature and, in general, whenever the law so imposes.
BiG may also have to transmit personal details of Clients to third parties to execute the contracts that it entered into with the Clients or instructions conveyed to it, in as much as this transmission is a condition sine qua non for the execution of these contracts or of these instructions.
BiG can transmit personal details of Clients to third parties, using contractually ensured adequate safeguards, and scrupulously respecting the rules of banking secrecy, whenever this is imposed by the way in which it has structured its activity and organization and depending on the contractual partnerships established. For example, BiG can use outsourced services for physical document archiving or outsource computer systems for the electronic filing of data or service provision (cloud computing).

6. Transfers outside of the space of the European Union?

Transfers of data outside of the space of the European Union ("EU") will only occur if this is necessary to execute contracts or instructions concluded or received from the Client, for example, if these contracts or instructions imply a sub-custodian outside of the space of the EU or the transmission of an order to a broker or trading platform outside of the space of the EU or if this is imposed by a legal obligation.
In other cases, these transfers will depend on the Client's consent and on the adoption of contractual measures that ensure an appropriate field of protection.

7. For how long are the personal details kept?

Personal details are maintained by BiG depending on the purpose that justifies their treatment.
As a general rule, BiG will not keep personal details after the reasons that justify their treatment have ceased and if the retention is not imposed by law.
It should be noted that some personal details, duly deleted from BiG's different databases, can be maintained on BiG's back-up files, duly framed by restrictive rules regarding access or their return to the computer system in as much as this is imposed by the security rules related with BiG's computer system, namely relating to the continuity of the business.
The banking and financial intermediation relationship are, as a rule, established for an indefinite period. So, personal details that are maintained for the purposes of carrying out operations related with the Contract or of a legitimate interest that exists due to the Contract, will last, at least, for the whole time that this contractual relationship lasts.
It should be noted that, even after the cessation of the contract, some records should remain accessible due to legal imposition or may be necessary to demonstrate the terms of the contractual relationship. In the Portuguese legal system, seeing that the ordinary period of limitation is 20 years, it may be necessary to keep records of personal details at least during this period.

8. What are the rights of the Clients relating to personal details?

Whenever the Client or any other holder may have **authorised** the treatment of personal details for one or more specific purposes, and this treatment only can be legally performed on the basis of this **consent** as no other grounds are applicable for the treatment, as informed in point 3 of this Information Document, the Client has the **right of withdraw his/her consent** at any time, and should contact BiG in writing for this purpose.

With regard to the treatment of personal details that is justified by BiG's legitimate interests, as informed in point 3 of this Information Document, and whenever BiG treats the details for a purpose other than those for which the personal details were gathered, **the Client or other data holders have the right to oppose** the treatment of data that relates to them, including the definition of profiles, **at any time, for reasons related with their particular position (right of opposition).**

The right of opposition includes opposition to personal details being treated for the purpose of direct marketing by BiG, or rather, **the Client can always, at all times, oppose BiG using their contact data for the purposes of advertising in relation to its products and services.**

The Client has the right, in the terms of data protection legislation:

a) to access, request the update or rectification of the personal details that relate to them **(rights of access and of rectification**), and should contact BiG in writing for this purpose; and, also,

b) in relation to personal details that may have been provided to BiG by the Client, in the execution of a contract or on the basis of consent, to request that these be delivered to them or to a different person responsible and treated as designated by them, in a structured format, of current use and automatic reading **(right of portability)** and should contact BiG in writing for this purpose;

c) in the conditions defined in the data protection legislation, among which (i) whenever the data cease to be necessary for the purpose that motivated their collection or treatment;
(ii) whenever consent is withdrawn and there are no other legal grounds for the treatment;
(iii) when the right of opposition is exercised and there are no prevailing interests that would justify the treatment, the Client has the right to request deletion **(right to be forgotten)**, and should contact BiG in writing for this purpose;

d) in the conditions defined in the data protection legislation, to request that the data treated by BiG be the object of **limitation of treatment,** in which case the data may only be kept by BiG or used with the consent of the holder or for the purposes of declaration, exercise or defence of a right in a legal case (**right to the limitation of treatment)**, and should contact BiG in writing for this purpose.

The data holder has the right to be informed by BiG on the measures taken following the exercise of his/her rights without undue delay and in the period of 30 days after reception of the request, notwithstanding the possibility of extension, in the legally contemplated terms.

The measures adopted are usually free.

If the requests are manifestly unfounded or excessive, BiG may demand the payment of a reasonable rate taking into account the administrative costs of the provision of the information or of the communication or can even refuse the request.

The Client or other data holders have the right, pursuant to Law, to present complaints relating to the treatment of personal details to the National Personal Data Protection Commission at the following address: www.cnpd.pt and to take legal action against BiG.

The Client can also, for any question related with their personal details, contact BiG's Data Protection Officer for the contact information mentioned in point 1 of this Information Document.

9. Definition of profiles and totally automated decisions

The definition of a profile is understood as any form of automated treatment of personal details that consists in use of these personal details to assess certain personal aspects of a natural person, namely to analyse or anticipate aspects related with their professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or travel.

As mentioned previously, in diverse cases BiG defines a Client profile, for example, to categorise a client as an investor, to define their financial classification and include them in a group of Clients.

Many of these "profile definition" situations are imposed by law in relation to measures to prevent money laundering and the financing of terrorism, or the prevention of fraud, in order to foresee the risk that the Client presents in these aspects. The law also frequently imposes "profile definition" for the protection of the Client him/herself, namely for analysis of the investment services and financial products that are suitable to their particular situation, the suitability of the credit that can be granted to them by BiG, etc.

In other cases, this "profile definition" is made by using the interconnection of diverse information for the purposes of pursuing BiG's legitimate interest of increasing the quality of the service provided to the Client, adapting and personalising products and services to their personal characteristics, and also the publication of the respective offer, for example sending specific content on BiG's site to the Client or sending them a particular marketing campaign.

In any case, the categorization or attribution of a determined scoring is made based on a mathematically proven and statistically recognised procedure.

These categorizations and scorings are looked on as auxiliary processes in the decisions taken and important measures in the management of the risk to which BiG is subject.

As a rule, totally automated decisions are not taken in BiG, nor is the definition of a profile made in a totally automated manner.

Whenever BiG applies an automated decision the Client will be informed of the fact, with this information containing details on the underlying logic, and also the importance and consequences contemplated of this treatment for the Client.