

## FAN PAGES

### Personal Data Protection Commitment

#### 1. Introduction

Norteshopping - Centro Comercial, S.A., with its registered address at Lugar do Espido, Via Norte, 4470-177 Maia, under the registration number 502 298 340 (hereafter "we" or "us") is the administrator of this fan page, which is part of the social network Facebook. Via this fan page we inform about our activities and provide a channel for communication with us.

#### 2. Delineation of responsibility

We only collect, store and use your personal data in accordance with the content of this data privacy notification and the applicable data protection regulations, in particular the EU General Data Protection Regulation (GDPR) as well as the national data protection legal regime. As part of our personal data protection commitment, we will inform you to what extent and for what purpose personal data is processed in connection with the use of this fan page. Further information on how we process your personal data may be found in our website personal data protection commitment which you find [here](#).

Due to the integration of the fan page in the offer of Facebook, it should also be noted that at the same time personal data is processed by Facebook. We have no influence on the processing of data by Facebook; in particular, Facebook does not act as a processor for us under our responsibility. Within the bounds of the possibilities on Facebook, we try to ensure the protection of your personal data. For data processing by Facebook apply - at least according to Facebook - the guidelines of Facebook, which are available at <https://www.facebook.com/policy.php>.

In terms of data protection law, a joint responsibility of Facebook and us for the operation of the fan page or the evaluation of user data when visiting the fan page is assumed. Facebook set the terms and conditions of the agreement between the joint controllers which the administrator of a fan page is to agree and which determines the delimitation of responsibility.

#### 3. Facebook Insights

Facebook offers administrators of fan pages the opportunity to get an overview of the use of the fan page and its users via the page insights feature. Above all, statistical data can be accessed and evaluated via page insights.

We use the data from page insights to make the fan page as attractive and efficient as possible. For this purpose, Facebook provides us with data which Facebook has generated itself. For more information on the functionality and responsibility for the page insights feature, please visit Facebook at [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

#### 4. Messenger

Facebook offers to users who are registered on Facebook, the possibility for immediate communication via Facebook Messenger. If you contact us via Facebook Messenger, the transmitted data will be stored and used by us exclusively for the purpose of answering your request. The legal basis for the processing of your data is your consent in accordance with Art. 6 para. 1 lit. a) GDPR as well as our legitimate interest within the meaning of Art. 6 para. 1 lit. f) GDPR. Our legitimate interest lies in the collection and processing of customer inquiries, in the evaluation of customer inquiries and in the controlling of possible abuse.

The data will be deleted as soon as it is no longer necessary to achieve the purpose of its collection. For your personal data, this is the case once the conversation has ended. For us, the conversation ends when it can be inferred from the circumstances that the facts are finally clarified. The user has the possibility to revoke his consent to the processing of personal data at any time; in this case the data will be deleted immediately if there is no basis for further storage.

#### 5. Messenger BOT

The Messenger BOT (hereafter BOT) is used in our Fan Page to reply and chat with our clients in an automatized way. The BOT is an automated messaging software that is programmed to understand our clients' questions and to provide answers in an automatic way and without human intervention. The clients will however be redirected to a human assistant in case BOT is no longer able to answer their questions. The data transmission, legal basis and data storage applied for the BOT is the same that is applied for the Messenger.

#### 6. Further information

If you have questions about the use of personal data by us in connection with the use of the fan page on Facebook, you can always contact us. The contact details and the communication channels are explained in our personal data protection commitment. If you have questions about data protection on Facebook, we ask you to contact Facebook directly.

You have extensive rights to the processing of your personal data. First of all, you have a comprehensive right to information and may, if necessary, request the correction and/or deletion or blocking of your personal data. You may also request a restriction of processing, have the right to object and the right to complain to a supervisory authority. You also have a right to data portability with regard to the personal data you provide to us. If you wish to assert any of your rights with regard to our data processing and/or request further information about it, please contact us. Further information on your rights can also be found in our personal data protection commitment available in our website and which you can find [here](#).

#### 7. Communication of personal data

Whenever necessary, we may communicate your personal data to entities that provide services to us.

In those cases, we contractually impose that those recipients implement adequate security measures to protect your personal data.

The categories of recipients to whom we may communicate personal data include:

- i. PSERVERS Consulting, Lda.
- ii. Performance Sales, Lda.
- iii. E.Lifemonitor, Lda.
- iv. CLVR365 Agência de Comunicação, Lda.
- v. ARN Media Communications – Publicidade, S.A.
- vi. Sierra Portugal, S.A.

And possibly other providers of the following services:

- vii. Community management for the Facebook Fan Page
- viii. Client support for products and promotions
- ix. Promote and support to Facebook Contests

We may possibly transfer your personal data in the context of a business sale or of the shopping center “NorteShopping”, of a merger, demerger or control change within our company or in the context of preparing any of those events. In any case, the processing of the data by the entity for whom they have been transferred will respect the terms of the present personal data protection commitment.

## 8. Updates to this Data Protection Commitment

The terms of the present commitment may be altered or updated, which will be subject to disclosure on the Facebook fan page.

## 9. Document changes

[illegible]