

# PRIVACY POLICY



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# 1 Objective

iTEAM is committed to protecting the privacy and personal data of its customers, employees and stakeholders. This policy aims to establish the principles and practices adopted by the company to ensure compliance with the European Union General Data Protection Regulation (GDPR), as well as other applicable data protection legislation.

# 2 Introduction

iTEAM is committed to maintaining information security, privacy and personal data protection, committing to treat personal data under its responsibility in accordance with the highest ethical and security standards, in full compliance with the GDPR and other applicable legislation.

Our commitment is based on the five pillars of information security, confidentiality, integrity, availability, compliance, prevention of personal data breaches and the principles defined in Article 5 of the GDPR:

- o lawful, fair and transparent treatment
- o specific, explicit and legitimate purposes
- o adequate, relevant and limited
- o accurate and up to date
- o need
- o security
- o responsibility

# 3 Definitions

For the purposes of this document, the definitions set out in Article 4 of the GDPR apply, including:

- **Personal data:** information relating to an identified or identifiable natural person.
- **Processing:** any operation or set of operations which is performed on personal data or

on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **Controller:** the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Processor:** a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **Consent:** of the data subject, a free, specific, informed and explicit manifestation of will, by which the data subject accepts, by means of a statement or unequivocal positive act, that personal data concerning him or her may be processed.
- **Personal data breach:** a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

## 4 Data processing, purpose and basis

iTEAM only processes essential personal data that is strictly necessary for the execution of its activities

Data	Purpose	Legal Basis
Employees	Compliance with contracts. Compliance with legal obligations. Internal communication; security; benefits management.	Execution of Contracts. Compliance with legal obligation. Legitimate Interest.
Clients	Compliance with contracts.	Execution of Contracts.
Suppliers	Compliance with contracts.	Execution of Contracts.
Contacts	Advertising and marketing campaigns.	Consent.

iTEAM does not process data referred to in the special categories of personal data, except if arising from a legal obligation and necessary for the vital protection of its employees.

## 5 Data Subject Rights

iT.EAM respects and facilitates the exercise of data subjects' rights as set out in Articles 15 to 22 of the GDPR, including:

- Right of access
- Right of rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making and profiling

iT.EAM provides holders of personal data with a communication channel with its person responsible for processing personal data [dpo@it-eam.com](mailto:dpo@it-eam.com) to exercise their rights.

## 6 Security Measures

iT.EAM implements appropriate technical and organizational measures in its processes to ensure a level of security appropriate to the risk, based on the best information security and cybersecurity frameworks available on the market.

Essentially, we adopt an information security and personal data protection management system with technical, physical and organizational measures documented and implemented in the organization, to protect the personal data of its customers, employees and users against destruction, loss, alteration, dissemination, unauthorized access or any other form of accidental or unlawful processing.

iT.EAM regularly provides training and awareness to its employees on compliance with relevant policies, procedures, rules and regulations regarding privacy and confidentiality of information.

iT.EAM uses VPN technology for the secure transfer of personal data, in addition to using encrypted messengers for communication with its personal data operators.

## 7 Data Sharing

We may share your personal data with:

- Service providers who assist us in operating our business
- Business partners to provide integrated services
- Government authorities when required by law

All third parties with whom we share data are required to maintain the confidentiality and security of your information.

## 8 International Data Transfers

We do not carry out international transfers of data collected within the European area or from European citizens.

However, if it is necessary to transfer your data outside the European Union, in order to fulfill contracts or legal obligations, this will only occur to a third country or international organizations that guarantee an adequate level of protection or through the implementation of appropriate guarantees, in accordance with Articles 44 to 50 of the GDPR.

## 9 Data Retention

We only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including any legal, accounting, or reporting obligations.

After the retention period ends, the data is securely deleted.

## 10 Navigation Cookies and Similar Technologies

We use essential cookies and similar technologies on our website to improve user experience and navigation. You can manage your cookie preferences through your browser settings.

## **11 Data Protection Impact Assessment (DPIA)**

iTEAM carries out AIDPs for processing operations that are likely to result in a high risk to the rights and freedoms of natural persons, in accordance with Article 35 of the GDPR.

## **12 Personal Data Breach Notification**

In the event of a personal data breach, iTEAM will notify the competent supervisory authority without undue delay and, if possible, within 72 hours of becoming aware of it, unless the breach is unlikely to result in a risk to the rights and freedoms of natural persons.

## **13 Data Protection Officer (DPO)**

iTEAM has appointed a Data Protection Office, who can be contacted via email: [dpo@it-eam.com](mailto:dpo@it-eam.com).

## **14 Supplier and Subcontractor Management**

iTEAM has defined and documented processes to maintain the security of personal data with its suppliers in the processing of personal data.

## **15 Privacy by Design and Default**

iTEAM adopts the principles of privacy by design and privacy by default in all its projects and processes involving the processing of personal data.

## 16 Privacy Policy Changes

This Privacy and Data Protection Policy is reviewed at regular intervals and may be changed or updated by iTEAM due to compliance with legal obligations or relevant changes in the company's activities. All changes made are effective when published, unless otherwise indicated.

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**PRIVACY POLICY**

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