



# | Privacy Policy |

## 1. | Who is the entity responsible for the processing of your personal data |

In the European Union, C-MORE SUSTAINABILITY, Lda., taxpayer number 516143107, with registered office at Avenida Duque de Ávila, nº 64, 7º Andar Letra A, 1050-083 Lisbon is the Data Controller in respect of the processing of personal data.

In the geography of Brazil, C-MORE SUSTAINABILITY LTDA, a company incorporated and existing in accordance to the laws of Brazil, registered under CNPJ with number 52.060.448/0001-02, with headquarters at Av Brigadeiro Faria Lima, nº 1811, Sala 1119, CEP 01.452-001, Jardim Paulistano, City and Federal Estate of São Paulo, Brazil is the Data Controller in respect of the processing of personal data.

C-MORE is the name under which the above described companies operate. Thus, whenever the terms C-MORE, 'We, 'Our(s)' are used throughout this document, these will be references to either applicable Company according to their respective geographies of operation. When we refer to 'you' or 'your', we mean the individual person identified or identifiable who visits our website and who is the holder of the personal data.

Where you have provided us with your personal data, for example if you subscribe to our newsletters or register on our website to request a meeting or contact from our teams, we undertake to use this data in accordance with this Privacy Policy.

## 2. | What is personal data? |

A personal data is any information relating to an identified or identifiable natural person, such as a name, an identification number, email, telephone number, location data, electronic identifiers or one or more specific elements of that person's physical, physiological, genetic, mental, economic, cultural, or social identity.

## 3. | What personal data does C-MORE collect? |

### 3.1 Website

We process various categories of personal data, collected by our website to be able to present you our offer of Services and allow you to navigate through our website ensuring a better experience.

We only collect the personal data that is essential to provide you with the Service you have requested. Thus the data we collect about you on our website includes:

- + **Identification data:** first name, surname, tax identification number, email address, telephone number and address, if you have subscribed to our newsletter or registered and requested direct contact from our team;
- + **Navigation data:** information relating to how you use our website;
- + **Data about your interactions with C-MORE:** records of your communications by email, chat or telephone with our customer service department, as well as any suggestions you have made to us;

- + **Data related to cookies and other similar technologies.** For information on the use of cookies, please refer to our policy.

### 3.2 ESG MATURITY© and ESG PRO© SOLUTIONS

The Service is not capable of collecting and/or processing any Personal Data of individuals or identifiable individuals.

In the event any data is transmitted into the Service by Clients or its Users, even if only temporarily, C-MORE shall have no intervention on such data processing and Client and/or its Users shall be in sole control of such data.

C-MORE collects and processes data only as follows:

- + **Identification data:** first name, surname, email address, telephone number and photo (if uploaded) to generate temporary credentials for System login and creation of User /Client Accounts;
- + **Data about your interactions with C-MORE in the context of Contract/Service management:** records of your communications by email, chat or telephone with our multichannel support service.
- + **Data will be processed as necessary to provide the Service, namely:**
  - i. The process of User enrollment with the System and generation of temporary User Credentials up to first enrollment/registration by User;
  - ii. Execution of the service request, response to requests for clarification and queries, use of the chat, content sharing, dissemination of news and other information and order processing, including the execution and issue of invoices and payment management, as well as the production of Service outputs for the Client;
  - iii. Improve the User experience;
  - iv. Ensuring the maintenance and security of the Service, monitoring the quality of the Service and its improvement;
  - v. Statistical purposes and statistical analysis, which will only be conducted on top of anonymized data layers.

## 4. | For what purposes do we process your personal data |

We process your personal data for a set of purposes and in accordance with the following legal grounds:

## 4.1 Website

Purpose of processing	Legal basis for treatment
<p>The handling of your requests, specifically to:</p> <ul style="list-style-type: none"> <li>- Collecting your requests and preferences;</li> <li>- Confirming your requests;</li> </ul>	<p>We process this data as it is essential for the execution of our services agreement.</p>
<p>Conducting satisfaction surveys to gather your opinion on the quality of the products we offer and our service.</p>	<p>We perform this processing based on our legitimate interest in knowing your needs better and improving our service and customer support.</p>
<p>Real time chat on our website using our "Blog".</p>	<p>We carry out this processing based on our legitimate interest in answering questions you have about our service.</p>
<p>Our business development, communication, and marketing activities, including:</p> <p>Sending emails with our newsletters and news;</p> <p>Managing and updating our customer databases.</p> <p>Contact from our business partners</p>	<p>Marketing messages from C-MORE regarding the promotion of our products and our service are subject to your consent.</p> <p>In case you are a user of our Services, you may receive commercial messages from us for similar products that C-MORE has to offer.</p> <p>The sending of these messages will only be done with your express solicitation, except situations based on our legitimate interest in communicating with you and letting you know about our products, news, and promotions.</p> <p>This data processing activity is based in our legitimate interest in managing our customer database.</p>
<p>Analysis of navigation data on our website.</p>	<p>The processing of this data is based on our legitimate interest in improving the offer of our products and Services and in being able to guarantee you the best browsing experience.</p>
<p>Analysis of the use of C-MORE technology solutions.</p>	<p>For performance of the contract and provision of services.</p>
<p>Conducting analyses, with the objective of producing outputs, according to the contracted technological solution package.</p>	<p>We treat this data as essential for the performance of the contract for the provision of our services.</p>

Evaluation and management of the service provided.	This data is processed on the basis of the performance of the contract for the provision of our services.
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## 4.2 ESG MATURITY© and ESG PRO© Solutions

**Operations** – Services Management, Services Order Processing and Management, Client Relationship Management, Complaints Management

**Technical and of Technical improvement** - To enable C-MORE and its partners and subcontractors to collect feedback in respect of Service as well as to operate and maintain it, thereby improving the USER experience;

**Usability** – In order to improve customer experience, without access to Personal Data or resource to user profiling data (anonymized).

## 5. | With whom we share your data |

We will only communicate your data to those who are involved in the process of collecting, delivering, paying, and invoicing for our Services, or promoting and communicating our Services and technological solutions.

This means that, if necessary and in the context of the provision of our Services and technological solutions, your data will only be communicated:

- + to our IT service providers, solely and exclusively, for the purposes of storage, development or maintenance of our technological solutions;
- + to our platform and solution providers for the processing of payment for Services you have requested us;
- + To third party service providers and intermediaries, subcontracted by C-MORE, solely and exclusively for the fulfillment of the purposes set out in this privacy policy. These companies are provided only with the data necessary for the provision of the service in question, in accordance with our instructions;
- + To third parties, contracted as business partners of C-MORE, for the development of business, provision and implementation of our services, within the scope and execution of the service contract;
- + In completing online surveys to third parties. However, the data transmitted are pseudonymised and cannot be attributed to a specific data subject, resulting only in global data in the study concerned;
- + To subcontractors and companies of the C-MORE business group, for the performance of services, to which the user voluntarily agrees to participate;
- + to our suppliers of e-mail marketing and communication solutions in order to be able to send you our communications.

C-MORE may also transmit user data to third parties when it deems such data communications as necessary or appropriate (i) in the light of applicable law, (ii) in compliance with legal obligations or court orders, (iii) to respond to requests from public or governmental authorities.

## 6. | International data transfers |

We will not transfer your personal data to any country outside the European Economic Area.

## 7. | How long we keep your data |

We will retain your personal data only for as long as is necessary for the specific purpose for which the data was originally collected. In some cases, and in order to comply with the law, for example tax obligations, we will have to keep your personal data for the period expressly provided for by law.

All data collected for purposes of enabling the registration, access and use of the ESG PRO® or ESG Maturity® Software services (including the creation of temporary passwords for individual users) shall be retained throughout the duration of the Service except where the registration is not completed by the corresponding data subject (user) within 30 (thirty) days, in which case the personal data will be irreversibly deleted by C-MORE.

Cancellation of user accounts by User, per the request of Clients or the users shall imply deletion of corresponding metadata of users that enabled the creation and usage of the (cancelled) account.

## 8. | What rights you have as holder of personal data |

As the holder of personal data, and provided that the necessary legal requirements are met, you have the right to:

- + request access to your personal data by asking us for information about the specific data we hold about you and the specific data processing we carry out;
- + request the rectification of any information about you that you believe is inaccurate or out of date;
- + To oppose the processing of your personal data for personal reasons;
- + Request the limitation of the processing of your personal data, for a defined period of time;
- + Request the portability in a structured, commonly used and machine-readable format of the data you have provided us with,
- + Request that we delete your personal data;
- + Withdraw the consent you have given for a specific data processing operation where that operation is based on your consent;

You may exercise any of these rights by sending an email to the following address: [gdpr@cmore.pt](mailto:gdpr@cmore.pt).

Furthermore, where you are an European citizen, you will always have the right to lodge a complaint with the National Data Protection Commission whenever you believe that your personal data has been violated.

In the geography of Brazil, similar rights are warranted pursuant to the applicable local laws of the applicable federal state.

## 9. | Data Protection Officer |

C-MORE has appointed a Data Protection Officer (DPO), who may be contacted by the email [dpo@cmore.pt](mailto:dpo@cmore.pt) or by registered letter with acknowledged receipt to Avenida Duque de Ávila, nº 64, 7º Andar Letra A, 1050-083 Lisboa.

## 10. | Legislation Applicable |

Data processing in the European Union by the corresponding Data Controller as designated in the front page of this Policy will be strictly governed by the laws of Portugal.

Data processing in Brazil by the Data Controller as designated in the front page of this Policy will be strictly governed by the laws of Brazil.

## 11. | Changes to the Privacy Policy |

This Privacy Policy was last amended at 20/10/2024