

CoThrusters Lda, a company incorporated and registered in Portugal with the commercial license no. 516 406 965 and registered address at Rua Acácias Mimosas nº 150, Coimbra, Portugal, is the entity responsible for the domain <https://cothrusters.com>, <https://cotmarketing.com>. Through access to the site, CoThrusters Lda. Collects, processes and uses, while being the controller, personal data of users.

Therefore, CoThrusters intends to disclose the way it processes personal data and indicate the rights of the data subject, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, in effect as of 25th of May of 2018 (hereinafter GDPR or Regulation).

CoThrusters processes personal data while fully respecting the individual rights and the current legal regime, with the purpose of maintaining a high standard of service.

The present Privacy Policy regulates, in addition to the Cookies Policy, the processing of data collected on this Website.

To obtain additional information regarding this matter, you can contact us through the channels referred to in 1.

1. Who is the data controller and who should the data subject contact on this topic?

The following contacts may be used:

CoThrusters Lda.

Rua Acácias Mimosas nº 150

3045-003 COIMBRA

Telephone:

E-mail: info@cothrusters.com

2. What personal data does CoThrusters collect and what are the respective sources?

CoThrusters process the personal data provided by the user by accessing the website and filling-in online forms for contact requests and/or subscription to newsletters, such as:

- a) Name;
- b) E-mail address;
- c) Site access information (IP address; date and time of access; pages visited within the site and browser used to access the site);
- d) (...)

3. For what purpose does CoThrusters processes personal data and what is its legal basis?

CoThrusters processes personal data in accordance with the provisions of the GDPR and complementary legislation for the following purposes:

- a) Establishment of contact with the user, after a contact request submitted on the website;
- b) Sending informative newsletters, after express request;
- c) Sending news and information within the scope of the carried-out activities;
- d) Management and continuous improvement of the website's performance.

Thus, the legal basis for data processing will be as follows:

- a) Consent of the data subject (Article 6 -1 a) of the GDPR;
- b) Legitimate interests of the data subject and CoThrusters (Article 6 – 1 f) of the GDPR).

4. Who are the recipients of the personal data?

Within the scope of its activity, CoThrusters may use third parties to provide certain services, which may, in some situations, require access by such entities to users' personal data. In this case, CoThrusters undertakes to adopt the necessary and appropriate measures, in order to ensure that the entities that have access to such personal data offer high guarantees at this level, which will be duly enshrined and safeguarded in a written contract to be signed.

5. What are the rights of the data subjects whose data is being processed?

According to the GDPR, the data subject has a set of rights, which are further detailed below, and which CoThrusters scrupulously undertakes to comply with:

- a) the right to information, under the terms set out in Articles 13 and 14 of the GDPR;
- b) the right of access by data subject, under the terms set out in Article 15 of the GDPR;
- c) the right to rectification, under the terms set out in Article 16 of the GDPR;
- d) the right to erasure, under the terms set out in Article 17 of the GDPR;
- e) the right to restriction of processing, under the terms set out in Article 18 of the GDPR.
- f) the right to object, under the terms set out in Article 21 of the GDPR.
- g) the right not to be subject to automated decisions, under the terms set out in Article 22 of the GDPR.
- h) the right to data portability, under the terms set out in Article 20 of the GDPR.
- i) the right to lodge a complaint with the supervisory authority, under the terms set out in Article 77 of the GDPR.

The data subject can at any time revoke the consent given for the processing of his personal data, whenever the respective treatment is based only on that consent, without this compromising the lawfulness of the processing carried out based on the consent previously given.

The data subject can exercise any of the rights granted to him by letter, fax, telephone contact or e-mail to the contacts indicated above.

6. How is personal data protected?

CoThrusters makes its best efforts to protect your personal data against destruction, loss, unlawful accidental alterations, unauthorized disclosure or access.

For this purpose, CoThrusters adopts the appropriate technical and organizational measures, such as security systems, access control and other procedures aimed at such protection.

7. How long is the personal data kept for?

The period of time during which personal data is stored and preserved will vary according to the purposes for which it was requested, in the following terms:

- a) The personal data collected for newsletter subscription will be kept for the period from the time your subscription is requested and until the respective consent is withdrawn;

b) The personal data collected for the purpose of establishing contacts and presenting commercial proposals will be kept for the period necessary for the purpose of complying with legal or contractual obligations that may arise from such contacts.

The user/data subject may, at any time, oppose the processing of data for the purpose of establishing contact, without this undermining the lawfulness of the data processing carried out based on the previously given consent, nor the further processing of the same data based on another legal basis.

8. Does the data subject have the right to lodge a complaint with the Supervisory Authority?

If the data subject considers that the rules provided for in the General Data Protection Regulation have been violated, he/she has the right and can submit a complaint to the supervisory authority, which now identifies itself:

National Data Protection Commission [CNPd]:

Address: Rua de São Bento, 148, 3º, 1200-821 Lisboa

Phone: 213928400

Fax: 213976832

E-mail: geral@cnpd.pt

9. Declaration on knowledge of the use of the sensitive and non-sensitive data collected and respective consent

The data subject, knowing that CoThrusters will proceed with the collection and processing of Personal Data, recognizes that by declaring “I have read and accepted the Privacy and Data Protection Policy”, it certifies that the information it provides is correct and true and that intends to submit the requested personal data, so it expressly authorizes its use exclusively for the purposes of the form that it has filled out.

10. Changes to the Privacy Policy

CoThrusters can change the privacy policy at any time. The changes will be duly published in digital format and may be sent in other support, if requested.