

PRIVACY POLICY

For Stepforward the protection of your personal data is a priority and, as such, we undertake to only process the personal data that are essential to comply with our obligations to you, in accordance with the General Data Protection Regulation and other applicable legislation on personal data protection in force in the countries where we operate.

Even though we have not changed the manner in which we process your personal data, we believe that it is important for you to understand what data we process, for what purposes, how we protect it, and what you're your rights regarding your data.

Who's responsible for the processing of your personal data, which data do we collect and when?

Stepforward will be responsible entity for the processing of your "Personal Data", which is the set of information that relates to you, the Customer, and that allows us to, directly or indirectly, identify you.

We ask you for certain personal data to provide you with the products or services you request. For example, when you make purchases, contact our consumer services, request to receive communications, create an account, or participate in our events or contests.

This personal data might include:

- contact details including name, email, telephone number and shipping, billing address;
- login and account information, including screen name, password and unique user ID
- personal details including date of birth and purchase history;;
- payment or credit card information
- personal preferences including your wish list as well as marketing and cookie preferences

Certain data is automatically collected from your device or web browser when you interact with our site. For more information about these practices, please visit our “**Cookies Policy**”. This data includes:

- Device IDs, call state, network access, storage information and battery information; and
- Cookies, IP addresses, referrer headers, data identifying your web browser and version, and web beacons and tags.

How and Why do we use your personal data?

We use your personal data for the following purposes:

- To provide the features of the site and services you request, such as the purchase of our products and the subscription to our mailing list;
- Customer support;
- Fulfilment of legal obligations;
- Accounting and corporate management and control.

To process your personal data, we rely on certain legal grounds, depending on how you interact with us.

- When you purchase our products from our Site, we need your personal data to fulfil our contract with you. For example, we need your payment and contact details to deliver your order.
- When you use subscribe to our mailing list, we rely on your consent for processing.
- We also rely on other legal grounds, such as our legitimate interests as a business, to comply with a legal obligation, or to protect your vital interests.

For how long do we retain your personal data?

Your personal information will be retained for as long as is necessary to carry out the purposes set out in this privacy policy (unless a longer retention period is required by applicable law). In general, this means that we will keep your personal data for as long as you keep your Gino-B account. For personal data related to product purchases, we retain this longer to comply with legal obligations (such as billing data, which will be kept 10 (ten)

years from the purchase, because it corresponds to the legal term of custody of commercial bookkeeping).

Once the end of the conservation period is reached, your personal data will be anonymised or safely destroyed.

With whom do we share your data with?

Firstly, we want to ensure that when your personal data is handled by processors at Stepforward request, we require from them the same level of privacy and security that we impose on us.

Your personal data may be transmitted to processors who, in the scope of the services provided by them, process your data on Stepforward behalf. In these cases, we always demand that the processors have the appropriate and effective security measures in place for the protection of your personal data.

The categories of processors to which Stepforward may refer to are, in particular, [...] and subcontracted entities for the execution of services in the areas of customer management, customer support and information systems.

When required by law, we may also be required to disclose your personal data to authorities or third parties, such as [...].

What are your rights regarding your personal data?

Your rights are important to Stepforward. As such, Stepforward guarantees that you have the adequate resources for the exercise the following rights:

- Access to your personal data;
- Update your personal data;
- Oppose the processing of your personal data;
- Request limitation on how we use your personal data while we correct or clarify any doubts about your content or the use we make of them;
- Request the portability of your personal data you provided us with;

- Request the deletion of your personal data;
- Respond to automated decisions that have been based on your personal data;
- Withdraw or change, at any time, the consent you have given us to use your personal data.

The exercise of these rights is not absolute, so when your personal data are used to safeguard the public interest, especially in cases of detection and prevention of crimes, the exercise of your rights may be limited.

For the exercise of your rights or whenever you have any question about the use that we make of your personal data, please contact us through the following means:

- a. Customer support: (+351) 91 475 03 65 ; and store@stepforward.pt
- b. Address: Edifício Parque América, Praça Luís Ribeiro, n. 23, 8th floor, room 86.

You may also contact our Data Protection Officer through the following means:

- a. Telephone: (+351) 702 28 86; and
- b. Email: store@stepforward.pt

If you are unhappy with the way we process your personal data or with our response to your request to exercise your rights, you may file a complaint to the portuguese supervisory authority: Comissão Nacional de Proteção de Dados (CNPd)

- Address: Rua de São Bento, 148 – 3º, 1200-821 Lisboa
- Telephone: +351213928400
- Fax: +351213976832
- Email: geral@cnpd.pt.

How do we protect your data?

The security of your personal data is of the utmost importance for Gino-B, so we have implemented the appropriate and effective security measures to prevent the undue or unauthorized use, access, alteration, destruction, or disclosure of your personal data.

Amongst others, we highlight the following security measures:

- Protection of information systems through devices that prevent unauthorized access to your personal data;
- Continuous monitoring of information systems with the aim of preventing, detecting and preventing the misuse of your personal data;
- Control of physical access to the places where your personal data are processed;
- [...]

Updates to this Privacy Policy

Applicable law and our practices change over time. If we decide to update our privacy policy, we will post the changes on our Site. If we materially change the way in which we process your personal data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes.