FASQON UNIPESSOAL LDA
Rua dos Aranhas n.º 51, sala 14, 9000-044,
Funchal, Portugal
office@fasqon.com https://fasqon.com/

PRIVACY STATEMENT

Last Updated

September 24, 2024

Fasqon, Unipessoal LDA, is a limited liability company incorporated in Portugal, Madeira (full name: Fasqon, Unipessoal LDA, registration number (Código de acesso): 2853-2787-4837) and was established under the laws of Portugal.

The Company's head office is based Lagoas Park, Building 7 - 1st floor South, office 13, 2740-244 Porto Salvo, Portugal. Fasqon, Unipessoal LDA is a service provider, with licenses issued by the Bank of Portugal enabling the Company to provide the services envisaged in these Terms of Use legally.

In this document, references to Fasqon/we/our/us/company are to Fasqon, Unipessoal LDA, At all times, any handling or delivery of Digital assets and any handling or dealing in any fiat currency will be carried out by Fasqon, Unipessoal LDA,. Any references to Customer/User/Client/you/your are references to you as a customer of Fasqon and a user of our services. Any references to the "Service" include websites, APIs, or mobile applications.

The Company uses cookies to keep our sites reliable, secure, and personalized. When you accept cookies, the site will improve by remembering your preferences, customizing content or ads, and enhancing your experience of our premium news, insight, and analysis.

This Policy applies to all websites and web applications that link to it and are published by the Company ("Sites").

This Policy should be read alongside our Privacy Statement, which explains how we use personal information.

If you wish to manage your cookies, please follow the instructions in the "How to manage cookies" section below.

1. How does the Company protect your personal data?

The Company attaches great importance to your right to privacy and the protection of your personal data. We want you to feel secure that when you deal with the Company, your personal data are in good hands.

The Company protects your personal data in accordance with applicable laws and our data privacy policies. In addition, the Company maintains the appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing and/or accidental loss, alteration, disclosure, or access, or accidental or unlawful destruction of or damage to it.

Which categories of personal data do we collect, and how do we process such personal data?

We collect personal data of our employees, potential employees, clients and their current/former/ prospective employees/directors, suppliers, business contacts, shareholders and website users. If the data we collect are not listed in this privacy statement, we will give individuals (when required by law) appropriate notice of which other data will be collected and how they will be used.

Below is also a chart describing the categories of personal data we collect:

- Personal details, contact details, and identifiers:

Name, pronoun, all types of identifiers and contact details (such as e-mail, phone numbers, physical address) and occasionally, when necessary for specific purposes, gender, date of birth, age, and place of birth, including Google and Google OAuth authentication data.

- Commercial information:

History and records of the products and services you have obtained from the Company. Correspondence between you and us when it is sent to a dedicated mailbox or via other electronic communication means (including communication channels supported by AI that – for example - generates content to assist our personnel when interacting with you), for the purpose of processing account receivable payments and commercial follow-up.

- Marketing and research information:

Identifiers – the IP address, social media handle or other online identifiers of a person, e-mail address/mobile number if used for direct marketing, and name and address.

Demographic data - (e.g. income, family status, age, gender, interests, pets, home ownership, health, current service providers).

Browser/web history data and preferences expressed through selection/viewing/purchase of goods, services and content, information about your mobile device including (where available) type of device, device identification number, mobile operating system.

Social media content – blogs, posts, and anything posted by an individual online or that mentions/ references an individual.

Analytics and profiles of the individuals based on the data collected on them.

Voice-enabled services (Speech-to-Text engines for search requests) without being recorded or stored by the mobile device.

- Sensitive data and biometric information:

NOT COLLECTED:

- Audiovisual materials:

Photographs, and images/footage captured/recorded on CCTV or other audio, video and related security/monitoring systems or captured during marketing/public filming events/sessions (including recording of virtual or live workshops or similar events/sessions), voice search functionality to enable a voice command feature that allows you to ask a question and see results (functionality enabled for mobile applications only).

- Position and professional or employment-related information:

Professional or employment-related information, such as description of current position, job title, employer, location, and Company contact(s).

- System and application access data and Internet and electronic network activity information:

Where you are provided with access to the Company’s systems, the Company may collect information required to access such Company systems and applications such as System ID, LAN ID, e-mail account, instant messaging account, mainframe ID, system passwords, and internet or other electronic network activity information, including access logs, activity logs, and electronic content produced using Company systems.

- Cookies and geolocation data:

As described below, we also may collect geolocation data in some circumstances. Please see our Cookies policy for more details regarding our use of cookies.

- Company alumni-related information:

Information you provide us when you register as a Company alumnus/alumna or update your profile, including your name and email address.

Correspondence between you and us.

Details on (former) compensation and payroll.

Details on (former) position.

Birth year when necessary for specific purposes.

Personal information we already have in our Company systems such as (former) Enterprise ID, (former) office location, telephone number, home address and education or training – this to verify your identity when registering on our Alumni Site.

In addition, for recruitment/employment purposes and to provide assessment and HR consultancy services to our clients, the Company may process the personal information set out in the table below.

- Additional personal details, contact details, and identifiers/demographics:

In addition to the personal details listed above, the Company may collect additional personal details for recruitment/employment purposes, such as national identification number, social security number, insurance information, marital/civil partnership status, domestic partners, dependents, emergency contact information, and military history; professional/personal calendar availability/scheduling information for meeting/communication purposes.

- Education information and professional or employment-related information:

The Company may collect information about your education and professional or employment-related information, such as your employment history.

- Sensitive data for recruitment purposes or for providing assessment/HR consultancy services:

The Company may collect certain types of sensitive information when permitted by local law or with your consent, such as health/medical information (including disability status), trade union membership information, religion, race or ethnicity, minority flag, and information on criminal convictions and offenses. The Company collects this information for specific purposes, such as health/medical information to accommodate a disability or illness (subject to legal limits on the timing of collection of such information and other applicable limitations) and to provide benefits, background checks, and diversity-related personal information (such as race or ethnicity) to comply with legal obligations and internal policies relating to diversity and anti-discrimination.

- Documentation required under immigration laws:

The Company may collect data on citizenship, passport data, and details of residency or work permit (a physical copy and/or an electronic copy).

- Talent management information:

Information necessary to complete a background check, details on performance decisions and outcomes, performance feedback and warnings, e-learning/training programs, performance and development reviews (including information you provide when asking for/providing feedback, creating priorities, updating your input in relevant tools), driver's license and car ownership information, and information used to populate biographies.

- Requested recruitment information:

Information requested to be provided during the recruitment process, to the extent allowed by applicable law.

- Recruitment information you submit:

Information that you submit in résumés / CVs, letters, writing samples, or other written materials (including photographs).

- Information generated by us during recruitment or during assessments:

Information generated by interviewers and recruiters related to you, based on their interactions with you or basic Internet searches, where allowed under applicable law.

- Recruitment information received from third parties':

Information related to you provided by third-party placement firms, recruiters, or job-search websites, clients where applicable.

- Audiovisual information processed during recruitment:

Photograph, and images/audio/footage captured on CCTV or other video systems when visiting our office or captured in the course of recruitment events or video recruitment interviews.

- Recommendations:

Recommendations related information provided on your behalf by others.

- Immigration:

Documentation and related information required under immigration laws.

- Employment history and background checks:

Information about your prior employment, education, and where applicable and allowed by applicable law, credit history, criminal records or other information revealed during background screenings.

- Diversity related information:

Information about race/ethnicity/religion/disability/gender and self-identified LGBT status, for purposes of government reporting where required by law, as well as to understand the diversity characteristics of the workforce, subject to legal limits and consent where applicable.

- Assessment information:

The information generated by your participation in psychological, technical, or behavioral assessments. You will receive more information about the nature of such assessments before your participation in any of them.

We also may derive inferences about you based on the information described above and also collect other information about you as described in this privacy statement. If you provide us with personal information of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this privacy statement and that the person has given you his/her consent for sharing the information with the Company.

The categories mentioned above of personal data can be obtained either directly from you (for example, when you provide information to sign up for a newsletter or register to comment on a forum website) or indirectly from certain third parties (for example, through our website's technology). Such third parties include our affiliates, public authorities, public websites and social media, suppliers, clients and vendors. Except where certain information is required by law or by Company policies (including management of an employment relationship with the Company), your decision to provide any personal data to us is voluntary. Please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy statement, and you may not be able to use certain tools and systems that require the use of such personal data.

For which purposes and on which legal basis do we use your personal data?

The Company uses your personal data only where required for specific purposes. Please view the table below for (i) a list of the purposes for which The Company uses your personal data and (ii) an overview of the legal basis for each purpose.

- Managing our contractual and/or employment relationship with you:

Necessary for the performance of a contract to which you are a party.

- Recruitment:

Justified on the basis of our legitimate interests in ensuring that we recruit the appropriate employees.

- Facilitating communication with you (including facilitating meetings; communication in case of emergencies, and to provide you with requested information):

Justified on the basis of our legitimate interests for ensuring proper communication and emergency handling within the organization.

- Operating and managing our business operations including or being part of the provision of our services to our clients and their employees/contractors and their customers, for example in collecting their data as part of surveys/assessments/psychometrics, data analytics, Marketing research or other purposes:

Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.

- Complying with legal requirements:

Necessary for the compliance with a legal obligation to which we are subject.

- Monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use):

Justified on the basis of our legitimate interests of avoiding non-compliance and protecting our reputation.

- Social listening:

Justified on the basis of our legitimate interest of protecting our assets and our brand on social media.

- Improving the security and functioning of our website, networks and information:

Justified on the basis of our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.

- Undertaking data analytics, i.e. applying analytics to business operations and data to describe, predict and improve business performance within Company and/or to provide a better user experience, including the use of AI/machine learning. This includes marketing analytics and analytics related to the organization of events/meetings. (more details on how we run analytics on our website can be found in our cookies policy)

Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.

- Marketing our products and services to you:

Justified on the basis of our legitimate interests for ensuring that we can conduct and increase our business.

- For audio/video captured during live/recorded events (including virtual events/webinars): to inform interested stakeholders about the content of such events/recordings (including online publication of such recordings for marketing purposes):

Based on your informed consent obtained prior to the event.

- Assess your suitability for employment for the role you are applying to, as well as future roles that may become available:

Justified on the basis of the Company's legitimate interests of ensuring that it recruits the appropriate employees.

- Manage your application:

Justified on the basis of the Company's legitimate interests of ensuring that it recruits the appropriate employees.

- Facilitate communication with you:

Justified on the basis of the Company's legitimate interests of ensuring proper communication within the organization and with you.

- Perform administrative functions (e.g. reimburse you for interview-related expenses):

Justified on the basis of the Company's legitimate interests of ensuring that it recruits the appropriate employees.

- Perform data analytics, including analysis of our applicant pool in order to better understand who is applying to positions at the Company and how to attract and keep top talent:

Justified on the basis of the Company's legitimate interests of ensuring that it continually improves its recruitment processes.

- In some cases, record your online interview for review by additional recruiters and hiring managers:

Justified on the basis of the Company's legitimate interests of ensuring that it recruits the appropriate employees.

- If you register on our Careers website, we will enter you into a database to receive future mailings about the Company positions and events. You may also receive personalized job recommendations while browsing our Careers website

Justified on the basis of the Company's legitimate interests of ensuring that it recruits the appropriate employees.

- Transfer your contact information, education data, employment data, application information and the CV, all as supplied by you in our recruitment system, to the Company Talent Connection —a site that we maintain to notify you about new positions that may be of interest to you:

Justified on the basis of the Company's legitimate interests of ensuring that it recruits the appropriate employees.

- Administration of employee benefits:

Justified on the basis of the Company's legitimate interests of ensuring that our employees receive the applicable benefits.

- Perform any legally required reporting and respond to legal process:

Compliance with a legal obligation.

- To enable alumni to search for and locate you via the directory if you are registered as a Company alumnus/alumna:

Justified on the basis of our legitimate interests of offering users the possibility to use the Alumni Site to contact other alumni.

- Provide users of the Alumni Site with a customized experience on the Alumni Site, including personalization services such as News and Events and interactive communications:

Justified on the basis of our legitimate interests of providing our users with a customized experience.

- To research and analyze our alumni demographics, interests and behavior in an aggregated form:

Justified on the basis of our legitimate interests to better understand and serve our users and improve the Alumni Site and its offerings.

- To contact alumni periodically with communications about events, publications or employment opportunities with Company, which we feel might interest you, unless you ask not to be contacted. You will have an opportunity to opt out of receiving further messages:

Justified on the basis of our legitimate interest for ensuring proper communication with, and sending marketing to, our alumni.

- To share alumni information with other internal Company systems, specifically our internal sales tool, to contact you with industry relevant information:

Justified on the basis of our legitimate interest for ensuring proper communication with, and sending marketing to, our alumni.

Legitimate interest means that the Company has reasonable grounds to process your personal information. Where the above table states that we rely on our legitimate interests for a given purpose, we are of the opinion that our legitimate interests are not overridden by your interests, rights or freedoms, given (i) the transparency we provide on the processing activity, (ii) our privacy by design approach, (iii) our regular privacy reviews and (iv) the rights you have in relation to the processing activity. If you wish to obtain further information on this balancing test approach, please contact the Company's Data Privacy Officer.

We will process your personal information for the purposes mentioned above based on your prior consent, to the extent such consent is mandatory under applicable laws.

To the extent you are asked to click on/check "I accept", "I agree" or similar buttons/checkboxes/ functionalities in relation to a privacy statement, doing so will be considered as providing your consent to process your personal information, only where such consent is required by mandatory law.

We will not use your personal information for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

Will we share your personal data with third parties?

We may transfer personal data to our service providers and professional advisors, public and governmental authorities, Company companies/affiliates, or third parties in connection with the Company's operation of its business, including any (potential) corporate or commercial transaction and including clients if the data has been processed to provide client services. Such third parties may be located in other countries. Before doing so, we shall take the necessary steps to ensure that your personal data will be protected as required by relevant data privacy laws and the Company's internal policies. The Company may also transfer your personal data to any of its global affiliates/partners in furtherance of any visits to our Company locations.

For example, we may disclose personal information to third parties for other business purposes as follows:

- We share your information with third-party service providers that provide services to us, including billing, payment processing, customer service, email deployment, advertising and marketing, security and performance monitoring, maintaining or servicing accounts, processing or fulfilling orders and transactions, verifying customer information, research, data hosting, auditing, and data processing;

- To protect and defend the legal rights, safety, and security of Company, our affiliates, users, or the public, including to protect against fraud and malicious activity; and

- For other business purposes described in this privacy statement or for any other purpose disclosed to you at the time we collect the information or pursuant to your consent.

We may also share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, initial public offering, or in the unlikely event of a bankruptcy.

Unless you are otherwise notified, any transfers of your personal data from within the European Economic Area (EEA) to third parties outside the EEA will be based on an adequacy decision or are governed by the standard contractual clauses (a copy of which can be obtained through the contact information included below). Any other non-EEA related transfers of your personal data will take place in accordance with the appropriate international data transfer mechanisms and standards.

When we transfer your personal information outside the European Economic Area (EEA), we will ensure that it is protected in a manner that is consistent with how your personal information will be protected by us in the EEA, respectively.

What about sensitive data?

We do not generally seek to collect sensitive data as defined in the second paragraph below (also known as special categories within the EEA) through this site or otherwise. In the limited cases where we do seek to collect such data, we will do this in accordance with data privacy law requirements and/or ask for your consent.

The term "sensitive data" refers to the various categories of personal data identified by data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent from you. These categories include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences (including information about suspected criminal activities).

What about data security?

We maintain organizational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

We adopt market leading security measures to protect your personal data. This includes (without being limitative):

- We hold an ISO27001 certification, which indicates that we adhere to the highest and strictest information security standards. This is a security standard awarded by the TUV Nord (“TUV”) that serves as international certification that Company adheres to the highest and strictest standards. This certification is the only auditable international standard that defines the requirements for an Information Security Management System (“ISMS”) and confirms that Company’s processes and security controls provide an effective framework for protecting our clients’ and our own information.

- We have regular penetration testing performed by a third party provider, which continues to show the strength of our technical defenses.

Where will your personal data be processed?

As a global organization with offices and operations throughout the world, personal data we collect may be transferred or be accessible internationally throughout the Company's global business and between its entities and affiliates.

What are the sources we get your personal information from?

If we do not obtain your personal information directly from you, we may obtain it from the following sources: publicly available sources (registers or the internet), Company employees, contractors, (prospective) members of board of directors, shareholders, Company's affiliates, subsidiaries and newly acquired businesses, employers of our contractors, our clients, public authorities, public websites and social media, previous employers, educational institutions, suppliers and vendors (including third party data providers).

In section 5, you can find more information on the sources of your personal information for marketing purposes.

How long will your personal data be retained by us?

We will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain your data for as long as needed in order to comply with our global legal and contractual obligations.

Which rights do you have with respect to the processing of your personal data?

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you and, if we do, to obtain information on and a copy of that personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Company no longer processes your personal data.
- Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal data: this right entitles you to request that Company only processes your personal data in limited circumstances, including with your consent.

- Request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to Company, or request Company to transmit such personal data to another data controller.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting the Company's Data Privacy Officer. Please note that this will not affect the Company's right to process personal data obtained prior to the withdrawal of your consent or its right to continue parts of the processing based on other legal bases than your consent.

If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to Company first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against Company with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).

2. How do we use personal data when you visit the Company's website?

In addition to the information set out above, the following sections describe how we use personal data when you visit the Company's website.

Which personal data do we gather?

The Company collects personal data at its websites in two ways: (1) directly (for example, when you provide personal data to sign up for a newsletter or register to comment on a forum website); and (2) indirectly (for example, through our website's technology).

We may collect and process the following personal data:

- Personal data that you provide by filling in forms on our website. This includes registering to use the website, subscribing to services, newsletters and alerts, registering for a conference or requesting a white paper or further information. Pages that collect this type of personal data may provide further information as to why your personal data are needed and how it will be used. It is completely up to you whether you want to provide it.
- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Any postings, comments, or other content that you upload or post to the Company website.
- Our website or mobile applications can collect personal information about your computer or your mobile device, including (where available) your IP address, operating system, type of device, device identification number, mobile operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our website, the pages you view and resources you access or download, including but not limited to, traffic data, location data, weblogs and other communication data. Please see the Cookies section below for more information.

Do we include (links to) websites and programs of third parties?

Our websites may include:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We do not accept any responsibility or liability for such third parties' sites or programs. Please check such third parties' terms of use and privacy statements before using and providing any information to such third parties' sites and programs.

How do we use personal data that we collect from our websites?

We use personal data for the purposes described in the section "For which purposes and on which legal basis do we use your personal data?" above, as well as to provide you with information you request, process online job applications, and for other purposes which we would describe to you at the point where it is collected. For example:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We analyze your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and make it more effective. Please see the Cookies section below for more information.

3. How do we use cookies (and other tracking technologies)?

In addition to the information set out above, this section describes how we use cookies and other tracking technologies.

We analyze your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and, eventually, to determine how we can tailor our website to make it a more positive and relevant user experience.

Please see our Cookies policy for more details including for information about your choices with respect to advertising and social media cookies and for access to our cookie consent manager. By using our website, you agree that we can place cookies and other similar technologies on your device as explained in our Cookies policy.

4. How do we use personal data when you visit our offices?

When you visit our offices, we process your personal data in accordance with this privacy statement and some specific information regarding the use of visitor data and the potential use of CCTV in our offices is provided in the reception area.

5. How do we use personal data for marketing purposes?

In addition to the information set out above, the following sections describe how we use personal data for marketing purposes.

What are the sources of marketing data?

The bulk of the personal data we collect and use for marketing purposes relates to individual employees of our clients and other companies with which we have an existing business relationship. We may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company.

Do we send targeted e-mails?

We send commercial e-mail to individuals at our client or other companies with whom we want to develop or maintain a business relationship in accordance with applicable marketing laws. Our targeted e-mail messages typically include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click. When you click a link in a marketing e-mail you receive from Company, we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

Targeted e-mails from Company may include additional data privacy information, as required by applicable laws.

Do we send push notifications?

If you use our mobile applications, you may receive notifications such as notifications of industry topics you selected to follow within the mobile app or live events information. With your consent provided through the app permissions/settings, we may send push notifications or alerts to your mobile device even when you are not logged in. At any time, you can manage your push notification preferences or deactivate these notifications by turning off the notification settings in the mobile app or in the device settings/app permissions of your mobile device.

Do we maintain Customer Relationship Management (CRM) databases?

Like most companies, Company uses customer relationship management (CRM) database technology to manage and track our marketing efforts. Our CRM databases include personal data belonging to individuals at our client and other companies with whom we already have a business relationship or want to develop one. The personal data used for these purposes includes relevant business information, such as: contact data, publicly available information (e.g. board membership, published articles, press releases, your public posts on social media sites if relevant for business purpose), your responses to targeted e-mail (including web activity following links from our e-mails), website activity of registered users of our website, and other business information included by Company professionals based on their personal interactions with you.

Do we combine and analyze personal data?

We may combine data from publicly available sources, and from our different e-mail, website, and personal interactions with you (this includes information collected across our different websites such as our careers and corporate sites and information collected when you sign-up or log on to our sites or connect to our sites using your social media credentials (such as LinkedIn and Xing). We combine this data to better assess your experience with the Company and to perform the other activities described throughout our privacy policy.

Do we share personal data with third parties?

In addition to the third parties mentioned in the section “Will we share your personal data with third parties?" above, we may share your personal data with marketing agencies.

What are your rights regarding marketing communications?

You can exercise your right to prevent marketing communications to you by checking certain boxes on the forms we use to collect your personal data, or by utilizing opt-out mechanisms in e-mails we send to you. In such cases, we will retain minimum personal data to note that you opted out in order to avoid contacting you again.

6. How else might we use your personal data

In addition to the information set out above, the following sections describe other specific uses of personal data by some Company affiliates.

Below, we provide you with further details about how we process your personal data in connection with any content creation / production purposes.

Content creation / production activities

Some Company entities are in the business of content production. We may process your personal data for these TV, film, marketing, advertising or other related content creation, production and distribution activities.

What personal data do we process in connection with production activities?

- The personal data that we process for production purposes include images and footage of you and may include your location at the time of filming.
- If you are a member of public, we will diligently attempt to make you aware of our location and filming activities in advance and will give you an opportunity not to enter the location where filming is taking place and participate in them.
- If you are a focus of our filming activities (i.e. a contributor or talent such as an interviewee, extra or actor, as opposed to a member of public) we will also collect and process your name, contact information and any other information provided in any pre-filming questionnaires and/or release forms, such as next of kin details.
- We may also collect and process special categories of data a such as health or disability information to the extent that this is necessary to enable us to make any necessary adjustments to our filming arrangements to assist or support you.
- If you have any questions on data privacy aspects of our production activities, please contact us.

7. Contact us

Please contact us if:

- You have a general question about how Company protects your personal data.
- You wish to exercise your rights in relation to your personal data rights.
- You wish to make a complaint about the Company's use of your data.

You can also contact the Company as data controller of your personal data via our Data Privacy Officer (preferably electronically) or via letter, clearly marked for the attention of the Data Privacy Officer, on this address: office@fasqon.com

For residents of the European Economic Area:

You may complain to your local supervisory authority or to our lead supervisory authority the Irish Data Protection Commission:

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland