

# **Sovereign - Consultaria LDA**

## **Privacy Notice for provision of Consultancy, Accountancy, Tax and Residency Services**

### **1. Purpose of this privacy notice**

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide to you with consultancy, accountancy, tax and residency services. These include, but are not limited to, the completion and filing of relevant tax forms, visa applications and the provision of tax agent authority in Portugal for both individuals and corporations.

This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

### **2. What Personal Data is**

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

'Criminal Offence Data' refers to personal data relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings.

### **3. Personal Data we collect**

The Personal Data we collect about you will be the minimum necessary to provide the services listed on Point nº1. The type of Personal Data we collect is outlined in the table below in the section entitled 'Purposes, lawful bases and retention periods'.

### **4. How we collect your Personal Data**

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

However, we may also need to collect Personal Data from third parties such as:

- Portuguese Government Institutions

- Lawyers
- Agents / Villa Managers
- Registers Office
- Social Security
- Investment Funds Agencies
- Banking Institutions
- Criminal Record Agencies

## **5. Cookies**

A cookie is a small text file which is placed onto your device (e.g computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our [Cookie Notice](#).

## **6. Purposes, lawful bases and retention periods**

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



<b>Categories of individuals</b>	<b>Categories of Personal Data</b>	<b>Purpose of Processing</b>	<b>Lawful Basis</b>	<b>Retention Period</b>
<b>Client</b>	<b>Name, address, email address</b>	<b>To onboard you as a client to be able to provide the required services</b>	<b>Contract</b>	<b>The minimum required for the service provided, in a maximum of 12 years</b>
<b>Client</b>	<b>Name, job title, work email address, work phone number, company you work for</b>	<b>To send you newsletters and other promotional material</b>	<b>Consent</b>	<b>2 years following last meaningful contact</b>
<b>Client</b>	<b>Name, address, email address, phone number, tax identification number, identification documents, financial and bank details, criminal records, marital status, family members, property details</b>	<b>To share information with Portuguese Government Institutions for Tax, residency and National Insurance purposes</b>	<b>Legal Obligation</b>	<b>The minimum required for the service provided, in a maximum of 12 years</b>
<b>Client</b>	<b>Name, address, email address, phone number, tax</b>	<b>To engage with lawyers, legal parties and third parties on</b>	<b>Contract</b>	<b>The minimum required for the</b>



	<p>identification number, property details, identification documents, marital status, financial details</p>	<p>your behalf to provide you with requested services.</p> <p>Examples include:</p> <p>Agents, property managers, lawyers, banking institutions and investment funds agencies</p>		<p>service provided, in a maximum of 12 years</p>
<p>LSEG Group</p>	<p>Name, address, data of birth and passport or ID</p>	<p>To conduct due diligence (background checks) which may reveal information about criminal convictions or offences</p>	<p>Legal obligation, the processing is necessary for reasons of substantial public interest on the basis of applicable law (includes laws designing Money Laundering, bribery and corruption)</p>	<p>The minimum required for the service provided, in a maximum of 12 years</p>

**Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.**

## 7. Marketing

We would like to send you information about our products and services, events and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email, telephone or social media.

You can unsubscribe at any time by:

- contacting us at [marketing@sovereigngroup.com](mailto:marketing@sovereigngroup.com)
- using the 'unsubscribe' link in emails.

You also have the right to object to your personal data being used for direct marketing purposes at any time.

For more information on how we use your personal data for marketing purposes, please see our [Marketing Privacy Notice - The Sovereign Group](#).

## 8. Sharing your Personal Data

In the course of providing you with this product/service – we may need to share your Personal Data with the following third parties:

- Portuguese Government Institutions
- Lawyers
- Agents / Villa Managers
- Investment Funds Agencies
- Banking Institutions
- LSEG Group

## 7. Retention

We will retain your personal data for as long as is necessary to provide the services which you have requested from us and in accordance with our Retention Policy.

However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to retain your personal data for a longer period where this is required in relation to legal claims, although this is rare.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 8. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

- In the EU/EEA these standards include Standard Contractual Clauses (SCCs) approved by the European Commission, which contractually oblige the entities in those countries to operate to the data protection standards expected within the EU/EEA.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

## 9. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**  
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)  
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**  
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)  
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**  
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**  
You have the right to restrict our use of your Personal Data.

- **Right to portability**  
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**  
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**  
You have the right to lodge a complaint with the CNPD, if you believe SCLA is infringing the data protection laws or you are concerned about the way in which we are handling your personal data.

The supervisory authority in the Portuguese Republic is the CNPD. You can find further contact details on their website <https://www.cnpd.pt>

Address: CNPD - Comissão Nacional de Proteção de Dados  
Av. D. Carlos I, 134, 1º  
1200-651 Lisboa

Phone number (+351) 213 928 400

Email: [geral@cnpd.pt](mailto:geral@cnpd.pt)

### **How to exercise your rights**

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

## **10. How to contact us and our Data Protection Officer**

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer as follows:

Parque Empresarial Algarve, Lote 8, n.º 21, 8400-431 Lagoa (Algarve), Portugal

Email address: [avieira@sovereigngroup.com](mailto:avieira@sovereigngroup.com)

Phone number: +351 282 340480.

## **11. Changes to this privacy notice**

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.