

privacy and cookie policy

Last updated 27/08/2024



AZEITONA VERDE

AZEITONAVERDE.PT



PRIVACY POLICY

S.A.V. Sociedade Azeitona Verde, Lda., registered at the commercial registry of Portalegre with NIPC 509709915 and headquartered at Quinta Azeitona Verde, Pasmal, 7330-069 Marvão, Portugal, hereinafter referred to as Azeitona Verde, is committed to respecting the applicable data protection principles and enhancing the legal protection of personal data subjects in strict compliance with applicable legislation, specifically Article 35 of the Constitution of the Portuguese Republic, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, concerning the protection of natural persons regarding the processing of personal data and the free movement of such data – General Data Protection Regulation (GDPR), Law No. 58/2019 of 8 August, which ensures the implementation of the GDPR in the national legal order, and Law No. 59/2019 of 8 August, which approved the rules regarding the processing of personal data for purposes of prevention, detection, investigation, or prosecution of criminal offenses or the execution of criminal penalties.

In the context of its activity, Azeitona Verde has created the Website accessible at the URL: <https://azeitonaverde.pt/>, through which users are provided with access to various information about its activities as well as an online store for purchasing its products. In this context, the present Privacy Policy aims to inform data subjects about how Azeitona Verde processes the personal data provided by users of the Website, for what purposes, with what legal bases, how the data is collected, including the consent obtained, with whom the data is shared, the retention period, and the different ways users can contact TECH INSECT to learn about and exercise their rights.

1. Data Controller

Azeitona Verde acts as the data controller within the meaning of the GDPR.

For any questions related to the processing of personal data under this Privacy Policy, you may contact Azeitona Verde via the following email address: info@azeitonaverde.pt.

2. Collection of Personal Data

Personal data should be understood as any information, of any nature and in any medium, relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or one or more elements specific to their physical, physiological, psychological, economic, cultural, or social identity.

In the context of using the Website, personal data is collected directly from the data subjects in the following cases:

- i. During the account creation process, by manually filling out the registration form, users provide personal information such as their email address;



- ii. During the purchase process, by manually filling in the fields related to billing and delivery details, such as full name, postal address, email address, phone number, tax identification number, country, or region;
- iii. When data subjects request contact through the email address info@azeitonaverde.pt;
- iv. When subscribing to Azeitona Verde's newsletter;
- v. During website browsing, users' personal data such as IP address, browsing history, and usage preferences may be collected.

Personal data may also be indirectly collected from data subjects in cases where, during the checkout process, the user selects the option to purchase a product on the Website as a gift. In this case, the customer also enters the data of the person to whom the order will be delivered.

Unless data collection is indicated as optional, all other personal data is mandatory, and the lack of it makes it impossible for Azeitona Verde to provide its services.

3. Categories of Data Subjects and Data Categories

The personal data collected by Azeitona Verde through the use of the Website pertain to the following categories of data subjects: registered users on the website and non-registered users on the website.

The personal data collected includes the following categories of common data:

- i. **Civil Identification:** includes the full name, surname of data subjects, and tax identification number for potential online orders, delivery, invoicing, as well as applicable warranties;
- ii. **Contact Information:** includes personal, professional, or institutional email addresses, essential for direct communication between Azeitona Verde and users;
- iii. **Browsing and Tracking Data:** includes technical information such as IP addresses (Internet Protocol), unique identifiers, as well as session and user cookies data, used to monitor and track data subjects' online activity when accessing the Website;
- iv. **Authentication Information:** consists of access credentials such as username and password, along with user profiles, which ensure the authentication and identification of data subjects in the digital context.

4. Purposes of Personal Data Processing

The personal data being processed will be processed lawfully, fairly, and transparently for the following purposes:

1. Website Management;
2. Customer and Order Management;
3. Marketing Management for sending newsletters;



4. Communication Management for responding to contact requests from users;
5. Application Infrastructure Management for the functioning of the Website.

5. Legal Bases for Processing

The processing of personal data by Azeitona Verde through the Website complies with the principles of lawfulness, fairness, transparency, and limitation of retention periods. In this context, the processing of personal data by Azeitona Verde is lawful based on at least one of the following grounds:

- i. **User Consent:** when users have given their express consent – in writing, orally, or by validating an option – and if that consent is free, informed, specific, and unambiguous. For example, in cases where they have given their consent for marketing purposes, such as receiving newsletters, and in cases where they consent to the collection of non-essential cookies, such as analytical, advertising, and personalization cookies;
- ii. **Execution of Contract and Pre-contractual Steps:** when the processing of personal data is necessary for the conclusion, execution, and management of the contract entered into with customers;
- iii. **Compliance with Legal Obligation:** when the processing of personal data is necessary to comply with a legal obligation to which Azeitona Verde is subject, such as the communication of data to judicial, tax, or regulatory authorities;
- iv. **Legitimate Interest:** when the processing of personal data is necessary for the management and proper functioning of Azeitona Verde's Website, as well as for direct marketing purposes to customers.

The processing of personal data for direct marketing purposes is based on:

- i. Azeitona Verde's legitimate interest when there is an existing customer relationship with the recipient and the communication concerns products or services similar to those previously subscribed to by the recipient, under Article 6(1)(f) of the GDPR;
- ii. The prior, express, and unambiguous consent of the recipient, in accordance with Article 6(1)(a) and Article 22(2)(c) of the GDPR, and Article 13-A of the Electronic Communications Privacy Law. In these cases, consent is given at the time of data collection and after acknowledgment of this Privacy Policy.

6. Rights of Data Subjects

As data subjects, you may exercise the following rights, within the limits of the law:

1. **Right of Access:** the data subject has the right to obtain confirmation from Azeitona Verde (data controller) whether their personal data is being processed and to access that data and request information about the processing.
2. **Right to Rectification:** the data subject has the right to obtain the rectification of inaccurate personal data and to have incomplete data completed.



3. **Right to Erasure:** the data subject has the right to obtain the erasure of their personal data, without prejudice to established retention periods.
4. **Right to Restriction of Processing:** the data subject has the right to obtain restriction of processing.
5. **Right to Data Portability:** the data subject has the right to receive their personal data collected through this website in a structured, commonly used, and machine-readable format. They also have the right to have the personal data transmitted directly to another data controller.
6. **Right to Object:** the data subject has the right to object at any time to the processing of personal data concerning them. Azeitona Verde will cease the processing of personal data unless it presents compelling and legitimate reasons for such processing that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims.
7. **Right to Withdraw Consent:** the data subject has the right to withdraw consent at any time, provided that the processing of data is based on consent and there is no other legal basis for such processing.

Right to Lodge a Complaint with the National Data Protection Commission (www.cnpd.pt) if they believe any of the rights listed above are being violated.

8. **Subcontractors**

Personal data collected may be transmitted to subcontractors to process it on behalf of and under the instructions of Azeitona Verde. These subcontractors provide services such as web hosting, mass email services, payment processing, shipping and delivery, transportation, and brand management.

Subcontractors that process personal data on behalf of Azeitona Verde are required to provide, in writing, sufficient guarantees of the implementation of appropriate technical and organizational measures to comply with the applicable privacy and data protection legislation and to ensure the defense of the data subject's rights.

7. **Data Transfer to Third Countries**

For the processing of personal data in the context of this website and for the purposes indicated, there is no transfer of personal data outside of Portugal.

8. **Data Retention Period**

The retention period for personal data is as prescribed by legal or regulatory norms or, in the absence of such, as necessary to achieve the purpose that motivated its collection and processing.



The personal data of users will be retained for the period necessary to fulfill Azeitona Verde's legal obligations and to legitimately exercise rights. In the absence of specific legal requirements, users' personal data will be stored and retained for the following periods:

- i. 20 (twenty) years after the contract ends for personal data related to the execution of contracts made in the online store;
- ii. 10 (ten) years for personal data related to accounting and tax documentation;
- iii. 6 months from the last interaction for personal data for marketing purposes;
- iv. 6 months from the last access for personal data for user management of the Website.

For statistical purposes, data may be retained for longer periods, without prejudice to applying appropriate safeguards for the rights and freedoms of the data subject under current legislation.

Once the maximum retention period is reached, your personal data will be irreversibly anonymized (anonymized data may be retained) or securely destroyed/deleted.

9. Measures Taken to Ensure the Security of Personal Data

To ensure the protection of personal data, Azeitona Verde implements strict, internationally recognized rules that apply to all those who legally handle personal data.

In this context, security measures of a technical and organizational nature are implemented to protect the personal data provided to Azeitona Verde, as well as the confidentiality, integrity, and authenticity of the data processed. The personal data stored by Azeitona Verde is encrypted and anonymized, whenever possible, and subjected to access control based on the principle of least privilege.

Azeitona Verde continuously reviews its information quality and security practices to ensure continuous improvement and to keep up with new cyber threats, implementing the necessary countermeasures.

In addition to using the HTTP protocol over an additional security layer that uses the SSL/TLS protocol (HTTPS), the system used on Azeitona Verde's Website encrypts information to ensure it is not intercepted when transmitted over the network. Similarly, Azeitona Verde has implemented authentication/access control systems (login and password) and firewalls.

Despite the security measures implemented by Azeitona Verde, users should also proactively adopt security measures, including ensuring they are using an updated device and browser with properly configured security patches, an active firewall, antivirus, and antispyware.

10. Notification and Complaints

Without prejudice to sending direct notification to Azeitona Verde through the contacts available at <https://azeitonaverde.pt>, you can file a complaint directly with the National Data Protection Commission (www.cnpd.pt) using the contacts provided by this entity for that purpose.



11. Changes to the Privacy Policy

This Privacy Policy may be subject to updates, so regular consultation is recommended. It is considered that changes take effect from the date they are posted on the Website, with express reference to the update date.

COOKIE POLICY

The website available at <https://www.azeitonaverde.pt>, hereinafter referred to as the Website, is owned by S.A.V. Sociedade Azeitona Verde, Lda., registered at the commercial registry of Portalegre with NIPC 509709915 and headquartered at Quinta Azeitona Verde, Pasmal, 7330-069 Marvão, Portugal, hereinafter referred to as Azeitona Verde.

The Azeitona Verde Website uses cookies and similar technologies to improve its quality and users' browsing experience. This Cookie Policy provides detailed information about the use of cookies and similar technologies, their management methods, and how they are used on the Website.

The Cookie Policy implemented by Azeitona Verde complies with the applicable requirements for personal data processing, in accordance with Regulation (EU) No. 679/2016 of the European Parliament and of the Council of 27 April (GDPR) and the requirements contained in Law No. 41/2004 of 18 August (as amended by Law No. 16/2022 of 16 August and Law No. 46/2012 of 29 August).

This Cookie Policy should be analyzed in conjunction with our Privacy Policy.

For more information about cookies, visit <http://www.youronlinechoices.com/pt/>.

Similarly, you can contact Azeitona Verde via the following email address: info@azeitonaverde.pt.

1. What are cookies?

Cookies are text files containing small amounts of information that are stored on personal computers (PCs) or other devices (e.g., smartphones, tablets, etc.) whenever users visit a website through an internet browser. Cookies allow websites to store certain information about users, eliminating the need for them to repeatedly enter the same information or preferences, meaning that on subsequent visits, the browser sends these cookies to the website that originated them and, in some cases, to other websites that are not the origin.

Cookies are, therefore, information files that can perform various functions, such as storing user preferences for certain types of information or storing information related to their visit to each website, with the primary objective of detecting the user on their visits to websites and their configuration parameters and preferences.

The use of cookies does not hinder internet access and does not identify the individual user, only the device used.

2. What are the functions of cookies?



Cookies perform various functions, including helping to manage and update website content, understanding how websites are used, facilitating users' navigation by storing their preferences, and, in general, improving the user experience on websites. They also ensure that websites present relevant content to each user. They are, therefore, tools for continuous improvement of the user experience.

3. Types of cookies

Entity Managing the Cookies	TYPE OF COOKIE	DESCRIPTION
Own	Cookies sent to users' devices from a computer or domain managed by the website owner and from which the requested service is provided.	
Third-party	Cookies sent to users' devices from a computer or domain that is not managed by the website owner but by another entity that processes the data obtained through cookies. This includes cookies installed from a computer or domain managed by the website owner but where the information collected through those cookies is managed by third parties.	
Session	Cookies designed to collect and store data while users access a website. They are generally used to store information that only needs to be kept for the duration of the requested service in a single session (e.g., a list of products purchased).	
Persistent	Cookies in which data remains stored on the device and can be accessed and processed for a defined period by the website owner, with the duration varying from a few minutes to several years.	
Technical	Cookies that allow users to navigate a website, platform, or application and use the various options or services available, such as controlling data traffic and communication, identifying the session, accessing restricted areas, remembering the items in a shopping cart, sharing content through social networks, etc.	



Customization	Cookies that allow users to access the website with certain predefined general characteristics based on a series of criteria on their device, such as language, the type of browser used to access the service, regional settings from where users access the website.	
Analytical	Cookies that allow the website owner to monitor and analyze user behavior. The information collected through these types of cookies is used to measure website activity, applications, or platforms and to create user browsing profiles of those websites, applications, and platforms, to introduce improvements based on the analysis of the data generated by website usage.	
Advertising	Cookies that allow for the most efficient management of advertising spaces that, where appropriate, the website owner has included on a website, application, or platform from which the requested service is provided, based on criteria such as the content edited or the frequency with which ads are displayed.	
Behavioral Advertising	Cookies that allow for the most efficient management of advertising spaces that, where appropriate, the website owner has included on a website, application, or platform from which the requested service is provided. These cookies store information about users' behavior by continuously observing their browsing habits, enabling the development of a specific profile to display ads based on that profile.	

4. What types of cookies are used by the Azeitona Verde Website?

Essential:

- **Strictly Necessary/Technical Cookies:** These cookies are essential because they ensure website navigation and the use of its functionalities, including recording whether the user has authorized the use of cookies by the website. This type of cookie does not require prior user consent for storage. Retention period of data collected in this context: one year after collection.

Non-Essential:

- **Functional/Customization Cookies:** These cookies allow websites to remember information about user choices, such as language, region of access, and customization by the user of the browsing experience on websites. These cookies expire at the end of the user session (e.g., when the user closes the browser window) or may persist longer



to remember user preferences and choices on the website if accepted. Retention period of data collected in this context: one year after collection.

Advertising Cookies: These cookies collect information about browsing habits on a browser and by the user, recording website usage. They are used to support more targeted marketing and communication actions. Retention period of data collected in this context: one year after collection.

Analytical Cookies: These cookies are used to analyze how users use the website and monitor its performance, for example, which pages have the highest number of visits or if a user is presented with an error message. This allows for a high-quality experience by customizing the offer and quickly identifying and correcting any problems that arise. These cookies are used for continuous improvement and statistical analysis. To collect this type of cookie, Azeitona Verde uses the Google Analytics analysis tool and its respective cookies. [Click here to view the Google Analytics Privacy Policy](#). Retention period of data collected in this context: two years after collection.

5. User Consent for the Collection of Non-Essential Cookies

Under applicable privacy and data protection laws, non-essential cookies are considered personal data.

Through Azeitona Verde's Website, the following categories of personal data will be collected with the user's prior consent: browsing and tracking data. Authentication information will also be collected without the need for consent as they are deemed essential for the proper and normal functioning of the Website.

For information on how Azeitona Verde processes personal data, what rights you have in this matter, how to exercise them, and what security measures have been implemented to ensure the protection of your data, please refer to our [Privacy Policy](#).

Under Law No. 41/2004 of 18 August (as amended by Law No. 16/2022 of 16 August and Law No. 46/2012 of 29 August), the installation and use of cookies depend on user consent, except where cookies are used to (a) transmit a communication through an electronic communications network; (b) provide an information society service expressly requested by the subscriber or user.

The user may choose whether or not to provide their personal data.

By default, Azeitona Verde only collects essential cookies for the proper and normal functioning of the Website.



All browsers allow the user to accept, refuse, or delete cookies, including by selecting the appropriate settings in the respective browser. You can configure cookies in the "options" or "preferences" menu of your browser.

By clicking the "I Accept Cookies" button, the Website user consents to the provision of data through the cookies they consent to be collected under this Policy and our Privacy Policy.

The user may, however, choose not to give their consent by clicking the "I Do Not Accept Cookies" button. Note, however, that disabling cookies may prevent some services of the Website from functioning correctly, partially or fully affecting navigation, which will impact your Website experience.

6. Redirection to Third-Party Pages

Social Buttons Azeitona Verde uses social buttons to allow its users to share content directly accessible on the Website. These buttons refer to social networks, which may obtain information about users' activities on the internet, particularly about the use of the Website. Understanding how the information is used and how it can be excluded from collection should be obtained by reading and understanding the respective Terms and Conditions of Use, as well as the Privacy Policies and Cookie Policies of those websites.

External Web Services Sometimes, Azeitona Verde uses external web services on the Website to display its content. For example, to provide images, videos, and conduct polls. In these cases, as with social buttons, Azeitona Verde is not authorized to prevent the collection of information about users' activities on the internet, particularly about the use of the Website when they access these contents embedded in the Website.

7. Cookie Management in Browsers

There is no standard way to remove or block cookies. However, all browsers allow a general removal of cookies from the user's computer. However, disabling cookies may result in all or some of the available functionalities being inhibited/unavailable, penalizing the browsing experience.

Users can edit their preferences for the use of cookies on the Website by accessing the "cookie settings" menu and saving their selection.

For more information on how to control cookies stored on your device, refer to the instructions provided by browsers below:

Google Chrome

- i. Select the "Settings" menu;
- ii. Select the "Show Advanced Settings" option;
- iii. Under "Privacy," select "Content Settings." More information here.



Mozilla Firefox

- i. Select the "Tools" menu;
- ii. Select the "Preferences" option;
- iii. At the top, select the "Privacy" icon. More information here.

Safari

- i. Select the "Edit" menu;
- ii. Select the "Preferences" option;
- iii. At the top, select the "Privacy" icon. More information here.

If you use more than one browser, you must manage cookies independently for each one.

More information about Cookies at: <https://www.allaboutcookies.org>.

Note that if you configure your browser to block technical/essential cookies, you may not be able to use our Website, view its content, and use its services.

Disabling cookies may cause some services or certain features of the Website to be unavailable or not work correctly, and users may need to change or manually enter certain information or preferences each time they visit the Website. Disabling other cookies, including third-party cookies, will not affect the functioning of the Website.

The choices users make regarding Website cookies will, in turn, be recorded in a special technical cookie, with the characteristics indicated in the table described above.

8. Cookie Management on the Website

Users can, at any time, edit their preference regarding the use of cookies on Azeitona Verde's Website, as it is as easy to give consent as it is to withdraw it.

9. Analytical and Advertising Cookies

Name	Domain	Validity	Description
_gat	Google LLC	azeitonaverde.pt	58 seconds
_gat_gtm.js	azeitonaverde.pt	59 seconds	This cookie name is associated with Google Universal Analytics.
_ga_ZZT17R7KRR	azeitonaverde.pt	1 year 1 month	This cookie is used by Google Analytics to maintain session status.



_gid	Google LLC	azeitonaverde.pt	1 day
_gat_UA-122313510-1	azeitonaverde.pt	59 seconds	This is a standard cookie set by Google Analytics.

10. Cookie Policy Updates

This Cookie Policy may be subject to updates, so regular consultation is recommended. It is considered that changes take effect from the date they are posted on the Website, with express reference to the update date.