

How we use your personal data

Introduction

This policy is for people whose personal data is being used as part of TLC's business.

Whenever we collect personal data, it will be knowingly, and we will explain what we intend to do with it. We will also provide you with specific choices regarding the purposes for which your personal data may be used.

Below we will explain how TLC uses (and protects) personal data - including information collected through our website and through participation in promotions organized by TLC and our partners. Therefore, please read the following carefully so that you understand how we use your personal data and, most importantly, your rights.

Who we are

The ICO registration number of TLC Marketing UK Ltd. is ZA786089. However, in this policy, "we", "our" and "TLC" refer to all the companies that make up the TLC group.

What personal data do we use

We collect and use the following types of personal data:

- Contact information (for example, your name, username, address, e-mail address and telephone number).
- Basic information about you (e.g., age or date of birth).
- Details of any contact or correspondence we have had with you.
- Financial details (for example, details of any payments you have made to us and where necessary your bank details).
- Information about how you use our services and promotions.
- Information about your preferences as a consumer.
- Information about how you use our website (for example, traffic data, location data, weblogs, and other communication data).
- Information about your computer, including your IP address where available, operating system and browser type.

How we collect this data

We collect your personal data when:

- You register on our website www.programa.pulsebyaubay.com.
- Subscribe to our mailing list.
- You take part in any promotions or competitions sponsored, promoted, or offered by us or any of our partners.
- Respond, contact us, or report a problem on our website.
- Participate in consumer research.
- Use our website.

What we use your personal data for

We use your information to provide you with:

- Products or services you have requested from us or our partners.
- Personalized experience and better understand your needs.
- Relevant marketing communications and advertisements.
- Updates from us or our partners that you have asked us to send you.
- Important information regarding products, services, or promotions (for example, confirming your order, reminding you of an upcoming event or informing you of changes that may affect you).
- Emails about specific topics, news, or updates that you have requested information about.
- Opportunities to participate in consumer research.

We also use your information to:

- Measure and understand how people react to a variety of marketing activities so that we can ensure our work is targeted, relevant and effective.
- Analyse and continuously improve the services we offer, our website and other products.
- Keeping our accounts, recordings, and database up to date and relevant.
- Support and manage staff.
- Comply with our legal obligations to regulators and official authorities.
- Exercise our legal rights (including in relation to legal proceedings).

Additionally, we sometimes must use personal data to detect or reduce fraud.

Legal basis for the use of your personal data

If you are an individual consumer, we will seek your consent to carry out direct marketing contacts, either by us or by our partners. We will also seek your consent to use your personal data to carry out consumer research. We may seek your consent for other specific products, services, or promotions. We will inform you immediately.

When we have a contract with you, we will also use your personal data when necessary for the purposes of the contract. It is important to note that if you do not provide us with sufficient personal data, we may not be able to fulfil a contract with you.

In other situations, our grounds for using personal data focus on legitimate business interests. We will always consider your rights and privacy before using your personal data for our business purposes. When your rights or privacy override business interests, we will not use your personal data.

Apart from our business purposes, we will also use your personal data when and where we have legal obligations to do so. For example, if a regulator or official authority asks us for your personal data.

If we collect information for one purpose and intend to use it for a different purpose, we will seek your consent to do so and/or inform you when necessary or appropriate.

Automated decision-making

We do not use automated decisions on our website.

Sharing your information

We share your personal data with the following organizations that process or store information on our behalf.

- Dot Mailer
- Survey Monkey

In some cases, we also share information with partner organizations that are involved in products, services, or promotions. For example:

- Brand partners
- Independent partners
- Digital agencies
- Delivery companies

Transferring information outside the European Economic Area

Some of our offices and partners we work with have headquarters outside the European Economic Area (EEA). When we send your personal data outside the EEA, to a country not recognized for providing adequate protections, we produce an appropriate contract, inter-group agreements or other safeguards to ensure that your rights are protected.

For how long we store your personal data

To help TLC manage our service and comply with our legal obligations we store your personal data for one year after the date of the product, service, or promotion for which the information was originally used. We only store information for a period longer or shorter than six years when we have legal obligations to do so.

Your rights

It is important that you are familiar with and able to exercise the following rights:

- The right to be informed that your personal information is being used or stored (precisely the purpose of this privacy notice).
- The right to access your personal information that is held or used by us.

- The right to reject direct marketing (by clicking on the "unsubscribe" button or by clicking [here](#)).
- The right to reject the use of your personal information in the field of personal interests.
- The right to withdraw consent to the use or storage of your personal information.
- The right to erasure of your information that is held or used by us (only in certain circumstances).
- The right to data portability.
- The right to have your personal information rectified if it is incorrect.
- The right to have your personal information restricted or blocked from being used or stored.

It is important that you are aware that these rights are absolute at present and that there may be some situations in which you cannot exercise them, or they may not be relevant. To help you understand how they work, we have provided links to the guide in the Information Commissioner's Office for each of the rights.

Data Protection Contacts

TLC Worldwide Portugal

Avenida D. João II,
Edifício D. João II, nº 46, 6ºA,
1990-095 Lisbon

privacy.pt@tlcmarketing.com

www.tlcmarketing.com/pt/ContactUs

You even have the right to lodge a complaint with your local privacy supervisory authority. Our main establishment is in the UK, where the local supervisory authority is the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire, United
SK9 5AF Phone: 0303 123 1113 or 01625 545 745

www.ico.org.uk

If you wish to exercise your right to lodge a complaint in Portugal, the local privacy supervisory authority is the CNPD:

Comissão Nacional de Proteção de Dados
Rua de São Bento
1200-821 Lisbon
Tel: 00351 213928400

geral@cnpd.pt

www.cnpd.pt