

# PRIVACY POLICY

## LVNDO – EMPREENDIMENTOS, S.A.

*Last updated: 2026/05/13*

### 1. Introduction

This Privacy Policy governs the processing of personal data carried out by “LVNDO – EMPREENDIMENTOS, S.A.”, (hereinafter “LVNDO” or the “Data Controller”) within the scope of its institutional, commercial and communication activities.

LVNDO is committed to ensuring that the processing of personal data is carried out in compliance with:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (“GDPR”);
- Portuguese Law No. 58/2019 of 8 August implementing the GDPR into the Portuguese legal framework;
- Angolan Law No. 22/11 of 17 June on the Protection of Personal Data;
- Any other applicable national and international legislation concerning personal data protection.

### 2. Identification of the Data Controller

The Data Controller is:

LVNDO – EMPREENDIMENTOS, S.A.

Registered with the Commercial Registry Office of the One-Stop Company Office (*Guiché Único da Empresa*) under registration number 5001439650

Tax Identification Number: 5001439650

Registered office: Rua Massano de Amorim, House No. behind IPGUL, Bairro Chicala, Ingombota Urban District, Municipality of Luanda, Luanda, Angola

E-mail: info@lundo.co.ao

### **3. Purposes of Processing and Legal Bases**

Personal data are processed for the following purposes:

#### **3.1 Management of the Institutional Contacts Database**

Personal data may be processed for the purposes of maintaining, organising and updating LVNDO's institutional contacts database.

Categories of personal data processed: Identification data (name, surname); Contact details (e-mail address, telephone number); Professional and institutional information (company, position).

Legal basis: consent of the data subject.

#### **3.2 Communication of Events and/or Activities**

Personal data may be used to send invitations, notifications and other communications relating to events, initiatives or activities promoted by LVNDO.

Categories of personal data processed: Contact details (e-mail address, telephone number); Communication preferences.

Legal basis: consent of the data subject.

#### **3.3 Newsletter Subscription**

Personal data may be processed for the periodic sending of institutional, informational or commercial newsletters.

Categories of personal data processed: Contact details (e-mail address, telephone number); Communication preferences.

Legal basis: consent of the data subject.

### 3.4 Marketing Communications

Personal data may be processed for the purpose of sending promotional communications, marketing campaigns and information regarding products or services.

Categories of personal data processed: Contact details (e-mail address, telephone number); Communication preferences.

Legal basis: consent of the data subject.

## **4. Voluntary Nature of the Provision of Data**

The provision of personal data does not constitute a legal or contractual obligation, nor is it a requirement necessary for entering into any contract.

Failure to provide personal data shall not entail any adverse consequences for the data subject, although it may prevent access to communications or functionalities associated with the identified purposes.

## **5. Retention of Personal Data**

Personal data shall be retained only for the period strictly necessary to fulfil the purposes for which they were collected and processed, or until the data subject withdraws the relevant consent.

Notwithstanding the foregoing, data may be retained for longer periods where required by law or for the establishment, exercise or defence of legal claims.

## **6. Recipients of Personal Data**

Personal data may be disclosed:

- To LVNDO's service providers acting as data processors;
- To third parties where necessary for compliance with legal obligations;
- To public, judicial or regulatory authorities where legally required.

LVNDO ensures that any processors engaged provide adequate guarantees regarding the protection of personal data.

## **7. International Data Transfers**

Where personal data are transferred to third countries or international organisations, LVNDO shall ensure the implementation of appropriate safeguards required under applicable legislation, including standard contractual clauses, adequacy decisions or other legally recognised mechanisms.

## **8. Rights of Data Subjects**

Under the applicable legislation, data subjects may exercise, at any time, the following rights:

- Right of access;
- Right to rectification;
- Right to erasure ("right to be forgotten");
- Right to restriction of processing;
- Right to object;
- Right to data portability;
- Right to withdraw consent at any time, without affecting the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

Such rights may be exercised by written request sent to: [info@lundo.co.ao](mailto:info@lundo.co.ao)

## **9. Automated Decision-Making**

Personal data shall not be subject to solely automated decision-making, including profiling, which produce legal effects concerning the data subject or similarly significantly affects them.

## **10. Security Measures**

LVNDO implements appropriate technical and organisational measures to protect personal data against destruction, loss, alteration, disclosure, unauthorised access or any other unlawful form of processing, as follows:

The measures adopted include, in particular:

- Access control;
- Restriction of permissions;
- Logical protection of systems;
- Internal confidentiality procedures;
- Secure storage of physical and digital media.

## **11. Cookies and Similar Technologies**

Where applicable, LVNDO's website may use cookies and similar technologies to improve browsing experience, analyse usage statistics and personalise content.

Further information regarding the use of cookies may be found in a separate Cookies Policy.

## **13. Right to Lodge a Complaint**

Data subjects have the right to lodge a complaint with their competent supervisory authority in the Member State of his or her habitual residence.

#### **14. Amendments to the Privacy Policy**

LVNDO reserves the right to amend this Privacy Policy at any time.

Any amendments shall be duly published through the appropriate institutional channels.