

Privacy Policy

Introduction

- Spark Agency and all its associated companies (hereinafter known as “Spark Agency”, “we” or “with us”) do hereby take on the commitment to preserve the privacy of each and every client and partner, candidate and/or user of this current Website (the “Site”) as current, former or potential. We are aware that important personal information is entrusted to us, and we would like to assure you that we take our responsibilities very seriously indeed, complying with all our legal obligations, in order to protect and safeguard this information.
- The present Policies for privacy and cookies (the “Policy”) describes, in great detail, the treatment we give to information that we collect when someone applies for a Recruitment Programme, signs up for a Pitch Bootcamp, or participates in one of the studies on The Most Attractive Companies in Portugal, or enters a contest, initiative or other programme organised by Spark Agency and also when someone visits this Website (the “Site”).
- The present Policy shall apply to the treatment of the personal data of our Candidates and Site Users. Here “Candidate” is defined as being any person who fills in a candidacy form for a Recruitment Programme, for a Pitch Bootcamp, or takes part in a project of the Study on The Most Attractive Companies in Portugal, and, in the contest associated with the Project, or if the person should sign up for a contest, initiative or programme organised or produced by the Spark Agency; if a paper copy of the person’s Curriculum Vitae is left at an event organised by the Spark Agency, or if, peradventure, they may spontaneously send their Curriculum Vitae by e-mail, this means the person shall also be considered a Candidate for the purposes of treatment of personal data and application of this Policy. The term ‘Users of the Site’ includes all the people who have access to the Site or to microsites of the Spark Agency.
- For effects of applicable legislation on data protection [including, among others, the General Regulations on Data Protection [EU Regulation 2016/679] (“RGPD”)], the company responsible for your personal data (“Spark Agency” or “we”) can be found [here](#).
- This Policy may be updated at any moment. We strongly advise that you visit this page regularly, to make sure that you read the most recent version.

What kinds of information do we collect?

- Candidate: In order to consider the Candidate for possible job openings, Pitch Bootcamp(s) or other activities that the Candidate intends to sign up for, we need to proceed with the handling of certain information about the Candidate, considering that the Candidate shall grant full and prior consent in this regard. We shall only collect the information that is strictly necessary and relevant for the intended purposes. This means that, depending on the circumstances, we may collect, in full or in part, the following information and/or elements, among others:
 - Name;

- Date of Birth;
 - Gender;
 - Photograph;
 - Contact information;
 - Educational level;
 - Professional and Extracurricular Experience;
 - Nationality, citizenship, and place of birth;
 - Financial expectations;
 - Interests, needs and expectations with regard to this future job opportunity;
 - Any further information that the Candidate decides to share with us;
 - Any further information that our clients or partners may share about themselves – provided this has been duly authorised – or information that has been obtained through consultation to social and professional networks, such as LinkedIn or other similar networks;
 - Dates, times and frequency or access to our websites and/or microsites;
 - Video images, on sending a video or during a video interview;
 - Pictures, especially photographs and videos, as obtained during an event promoted or organised by Spark Agency.
- Site Users: We may use cookies to collect (limited) information about the use of the site, and also to facilitate your browsing of the Site and/or microsites, helping us to further better your experience when you use our Site and also to help us manage the services we offer. This includes information about how you use our Site and/or microsites, how often you access such sites, the type of browser you use, your location from where you access our Site and/or microsites, the language you choose to view the sites, and the time of day when our Site is most popular.
 - The collection and treatment of such personal data is necessary for compliance with our contractual obligations. If you refuse to provide us with the personal information that we require, we may not be able to consider you for the recruitment opportunities you had decided to take part in.

How do we collect your personal information?

- Candidate: We normally collect personal information from Candidates in two different ways:
 - I. Information directly supplied by the Candidate;
 - II. Information indirectly supplied by the Candidate.
- Site Users: When you visit our Site, there is some information that we may obtain automatically, whether you decide to use our Services or not. This information

includes your IP address; the date, time and frequency of your visits to the Site; and the way you browse through the respective content.

Personal information supplied directly by the Candidate

- Spark Agency has to be aware of certain information about yourself, so they can provide a customised service. This shall allow us to consider you for the recruitment processes in which you may participate, or for other opportunities that we feel could be of interest to you.
- There are several ways in which you may share your information with us. We can obtain your information on doing the following:
 - Filling in the form to sign up for a Pitch Bootcamp;
 - Filling in the form to take part in a Recruitment Programme;
 - Filling in the form to take part in a contest, initiative of programme either organised or promoted by Spark Agency;
 - Handing in a paper copy of your Curriculum Vitae at an event or other activity organised by Spark Agency;
 - Sending your Curriculum Vitae spontaneously, by e-mail;
 - Sending your Curriculum Vitae by e-mail within a specific recruitment process;
 - Being interviewed by a Spark Agency employee;
 - Applying for jobs through a job agency, which shall later send this information to a specific candidature form for the Spark Agency;
 - Entering your personal data on the Site or on one of the microsites of the Spark Agency;
 - Participating in the Study on the Most Attractive Companies in Portugal, or in the contest associated to the Project;
 - Sending a video or participating in a video interview;
 - Contacting Spark Agency by e-mail, telephone, or through social networks.

Personal information supplied indirectly by the Candidate

- On the other hand, we can also get personal information about the Candidate by collecting the information available to the general public and/or through third parties that have been duly authorised to share your personal information with us, namely:
 - Through clients or partners who have been duly authorised to share your personal information;
 - Through other institutions and/or organisations that have been duly authorised to share your personal information;
 - Through researching possible Candidates on social networks, such as LinkedIn, Facebook, Instagram or other similar institutions;

- By researching possible Candidates on job recruitment pages;
- Through cookies, based on the definition of cookies of your browser – when you have access to our Site, or read or click on an e-mail of ours.

How do we use your personal data?

- The personal data we collect shall be used, among others, to promote your greater personal and professional value, to manage your career, and to identify new job opportunities. In some cases, such use may be limited to one specific purpose and, when this is the case, this information shall be mentioned on the registration form, under the condition of confidentiality of data.
- Candidate: Your personal information may be used in the following situations:
 - Within the scope of a Recruitment Programme;
 - Within the scope of a Pitch Bootcamp;
 - Within the scope of a Study of the Most Attractive Companies in Portugal;
 - Within the scope of a contest, initiative or programme either organised or promoted by Spark Agency;
 - Within the scope of job opportunities that are suited to your profile and personal interests;
 - Within the scope of Marketing activities, especially so that you may receive job opportunities of your interest, or information about contests and/or activities developed by Spark Agency (or in collaboration with us) which we feel would be interesting to you.
- We need your consent for some aspects of these activities that are not covered by our legit interests (particularly the collection of data through cookies and the supply of direct marketing to you through digital channels), and, depending on the situation, we shall request these through an opt-in or soft opt-in option. Soft opt-in consent is a specific type of consent that is applied when you have previously had some kind of involvement with our company (for example, signing up for a Pitch Bootcamp) and when we are promoting other recruitment-related services. According to the terms of a soft-in consent, we consider that your consent has been given, unless or until you exclude yourself. For most people, this is beneficial, as it allows us to suggest other job openings apart from the specific job you have applied for, thereby significantly boosting the likelihood that we may propose a new job opportunity for you. For other types of e-marketing, we are required to get your specific consent.
- If you wish to know more about how we obtain consent, please click [here](#). If you do not agree with our approach to marketing, then you are entitled to withdraw your consent at any moment. Should you wish to do this, please send us an e-mail at contacto@sparkagency.pt, stating this desire.
- Site Users: We shall use your data to help us to improve your experience when using this Site.

- If you wish to find out more about cookies, especially about how we use them and what options you have available, then please click [here](#).

Monitoring of Equal Opportunities and other sensitive personal information

- Some of the data that we may obtain about you includes information on diversity, especially your gender, which is relevant for the monitoring of equal opportunities issues.
- Some of the data we may obtain about you, even though we may not have requested such information, concerns sensitive personal data. This could include information about one's ethnicity, gender, physical handicaps, age, sexual orientation, religion and other similar beliefs, and/or social and economic context. We shall use this information using an anonymous database to monitor the extent to which we comply with our Equal Opportunities policy.
- This information is known as "sensitive" personal information, and, for this reason, we shall request your consent by offering an opt-in option. This means that you need to explicitly and clearly tell us that we accept our collection and use of such information.
- If you do not agree with this situation, then you have the right to withdraw consent at any moment. You can find out how to proceed by clicking [here](#).

Help us to declare, or to exercise or defend an entitlement or right

- In rare circumstances, we may use your personal data to help us to declare, exercise, or defend a right.

With whom shall we share your personal information?

- We may share your personal data in several different ways and for several reasons, including the following:
 - If you are a Candidate: We can share your data with prospective employers, especially Spark Agency clients or partners;
 - Tax authorities, audits or other types, when we consider it to be in good faith that legislation or any other regulations could require that such data be shared by us;
 - Third-party service providers who carry out functions on our behalf (such as solicitors, auditors, accountants, computer consultants, and other technical support roles);
 - Third-party service providers offering services such as online platforms that Spark Agency works with, especially online form platforms, and platforms for sending newsletters, according to applicable laws and regulations, or providers of computer services and storage of externalised documents, according to applicable rules and regulations.

How to we safeguard your personal data?

- We take all necessary measures and uphold all security standards for the protection of personal data, and in our systems and files we install all technical gadgets necessary for ensuring the confidentiality of data, avoiding the loss or mislaying thereof, as also any alterations or changes thereto. However, the user must be aware that security measures on the Internet are not infallible.
- Should you suspect that some of your personal information has been unduly used, lost or accessed, then please let us know immediately. You may contact us by e-mail at contacto@sparkagency.pt, or through other media (for further information about our contact details, please click [here](#)).

For how long shall we keep your personal data?

- The period during which we hold on to your data depends on the programme or the activity for which you are applying, as follows:
 - If we have collected your information within the scope of a Pitch Bootcamp, a Study on the Most Attractive Companies in Portugal, or other project or activity by Spark Agency, then your data shall be kept on our files for a period of 5 years;
 - If we have collected your information within the scope of a Recruitment Programme or any other project or activity in which Spark is the company providing services for a client or partner, then your data shall be kept on our files for 2 years.
 - If, after the period set for a project, we have had no relevant contact with you, especially if there is no written or verbal communication, or if you do not participate in one of the events organised by Spark Agency, such as a Pitch Bootcamp, then your personal data shall be 'disassociated'.
- This 'disassociation' of data means the elimination of the following data: name, contact telephone, and address, meaning that it shall no longer be possible to associate such data to the rest of the data we have; this, in turn, means that we shall not be able to identify you.
- It is also important that the personal information that we hold about you be precise and current. Please let us know if there are any changes to your personal information during the period in which we keep your data on file.

How can you access, change or eliminate the personal data that you supply to us?

- At any moment, you have the right to request:
 - Access to your personal data;
 - Corrections to your personal information;
 - Opposition, elimination or limits on the treatment given to your personal data.

- If you plan to invoke any of these rights, you may send us an e-mail, at contacto@sparkagency.pt, expressing this same interest.
- You may also ask to cancel the sending of newsletters, at any time. To do this, you should send us an e-mail, at contacto@sparkagency.pt, expressing this same interest.
- Your requests shall be handled with special care, so that we may assure that your rights shall be effective.
- You must also be aware of the fact that, in certain cases, as according to the terms and provisions of applicable Law, your request may not have immediate effect, or satisfied in full. Regardless of the situation, we shall reply within 30 (thirty) days (even though, in specific cases, we may be allowed to extend this period). We may also ask you to verify your identity, or ask for more information about your request.

Portability of Data

- Right to portability of data: If you intend to do this, you have the right to transfer your personal data between institutions responsible for the treatment thereof. This means, in effect, that you may transfer your personal data, held by Spark Agency, to another institution. In this domain, transfer your data in an automatic reading format of current use (password-protected) directly to yourself, so you can then transfer the data to another institution. This right to portability of data applies to personal data that you have supplied directly.

Right to Claim

- Right to make a claim to a controlling authority: You shall also have the right to make a claim to the commercial authority for control (National Data Protection Committee) (Portugal). You may find the contacts [here](#).

Who is responsible for the treatment of your personal data?

- Spark Agency is the institution responsible for storing and using your personal data.
- Should you have any comments or suggestions, regarding this Privacy Policy, you may send us an e-mail at: contacto@sparkagency.pt.

Cookie Policy

- A cookie is a small data file that is stored in your computer through the browser, retaining information related to your personal preferences, but not including your personal data as such. Cookies are used by almost all websites, and do not harm your system in any way. Cookies also help to establish the use, interest, and number of uses of websites, allowing a quicker and more efficient browse, and eliminating the need to enter the same information many times.
- We also use cookies to track your use and browsing of our Site, which allows us to improve the Site and the services we offer, in reply to what the visitors to the site want and need.

- If you plan to check or change the type of cookies that you accept, you may do this through the definitions of your browser.

Consent

- In certain circumstances, we are required to seek your free and informed consent for the treatment of your personal data, with regard to certain activities. Depending on what exactly we plan to do with this information, this consent shall in fact be a consent for inclusion or consent for a soft opt-in. This means we shall have the permission to send newsletters and e-mails about job opportunities, and about other opportunities which we feel would be interesting to you. However, you shall have the right to withdraw your consent regarding such activities. You may find out how to do this here.

Attachment 1 – How to contact us

- You may contact us:
 - Should you wish to access, change or eliminate the personal data you have supplied to us;
 - If you suspect that your personal data has been misused, lost, or unduly accessed;
 - To withdraw your consent regarding the use of your personal data;
 - To make any comments or suggestions with regard to this Privacy Policy;
 - In any other cases as you may deem relevant.
- The institution responsible for the use of personal data is Spark Agency.
- You may contact us by e-mail at: contacto@sparkagency.pt or, if you prefer, you may write to the following address:

Spark Agency
Centro de Negócios Ideia Atlântico, CX 055,
Av. General Carrilho da Silva
P-4719– 005 BRAGA, Portugal

Attachment 2 – How to contact the local Authorities (Portugal) – National Data Protection Committee (CNPd)

- You may contact the CNPD in any of the following ways:
 - By telephone at (+351) 21 3928400 / Privacy Hotline: (+351) 21 393 0039
 - E-Mail: geral@cnpd.pt
 - Online requests for information:
 - https://www.cnpd.pt/bin/Duvidas/Duvidas_frm.aspx
 - Online submission of complaints:

- https://www.cnpd.pt/bin/Duvidas/Queixas_frm.aspx
- Address: Rua de São Bento, 148, 3rd floor – P-1200-821 – LISBON, Portugal
- Fax: (++351) 21 397 68 32

Glossary

- **Candidate:** Here we understand a “Candidate” to be any person who fills in an application form for a Recruitment Programme, or who signs up for a Pitch Bootcamp or to participate in a Study on the Most Attractive Companies in Portugal, or the contest associated to the Project; if the person fills in a form for a competition, initiative of programme, either organised and/or promoted by Spark; if the person leaves a paper copy of his/her Curriculum Vitae at an event organised by Spark Agency or in the company offices; or if they spontaneously send their Curriculum Vitae by e-mail, or through social media or through other methods.
- **Eliminate:** Even though we shall make every effort to permanently delete your personal data as soon as the preservation period lapses, or when we receive a valid request from you, to do so, some of your data may remain on our systems, such as if they are awaiting replacement. In this case, such data was placed out of use, which means that, even though they are still in our system, it shall not be possible to link them to yourself, and neither shall it be possible to contact you.
- **General Regulations for Data Protection (GRPD):** A legal instrument of the European Union (EU), seeking to harmonise European legislation on data protection. It has an application date of 25 May 2018, and any references to such regulations must be interpreted in compliance, to include any legislation for its implementation.
- **Site Users:** Anyone who accesses one of the sites or microsites of Spark Agency.