**PRIVACY POLICY
APPLICATION PORTAL – NOVA IMS**

**SCOPE**

This privacy notice applies to the processing of personal data of applicants to NOVA IMS, carried out through the Application Portal.

**WHO WE ARE?**

For the purposes of applicable personal data protection legislation, namely the General Data Protection Regulation (hereinafter, “GDPR”), Universidade Nova de Lisboa, legal entity no. 501559094, with registered office at Campus de Campolide, 1099-085 Lisbon, and more specifically NOVA Information Management School (“NOVA IMS”), as an Organic Unit of Universidade Nova de Lisboa.

NOVA IMS is the data controller for the personal data it processes, as defined and used in personal data protection legislation.

**WHAT ARE THE PURPOSES FOR PROCESSING PERSONAL DATA?**

NOVA IMS processes personal data for the following purposes:
a) Creation of an account for the subsequent completion and submission of applications;
b) Evaluation and selection of applicants;
c) Communication related to the user’s application process;
d) Sending communications, including information about programs, events, or other initiatives promoted by the school;
e) Preparation of management support reports.

Any reuse of personal data for a different purpose shall be assessed in accordance with the criteria set out in Article 6(4) of the GDPR.

# WHAT IS THE LAWFUL BASIS FOR THE PROCESSING OF PERSONAL DATA?

The processing of personal data carried out by NOVA IMS is based on the following lawful grounds:

a) For the purpose of creating an account to subsequently complete and submit applications, the applicable lawful basis for data processing is the performance of a contract;

b) For the purpose of evaluating and selecting applicants, the applicable lawful basis for data processing is the performance of a contract;

c) For the purpose of communications related to the user’s application process, the applicable lawful basis for data processing is the performance of a contract;

d) For the purpose of communications regarding programs, events, or other initiatives promoted by the school, the applicable lawful basis for data processing is consent;

e) For the purpose of preparing management support reports, the applicable lawful basis for data processing is legitimate interest.

Data subjects may request information regarding the criteria applied to determine the existence of a legitimate interest by contacting the NOVA IMS Data Protection Policy Officer at the email address privacidade@novaims.unl.pt. They may also contact the NOVA Data Protection Officer at dpo@unl.pt.

# WHAT ARE THE RIGHTS OF DATA SUBJECTS?

Data subjects may, at any time, exercise a range of rights under the applicable law. These include the right to object – commonly exercised in relation to certain types of communications – as well as the rights of access, erasure, restriction of processing, rectification, and the right to withdraw consent.

These rights may be exercised by contacting privacidade@novaims.unl.pt. You may also contact the NOVA Data Protection Officer at dpo@unl.pt.

Data subjects also have the right to lodge a complaint with the Portuguese Data Protection Authority (Comissão Nacional de Proteção de Dados) at <https://www.cnpd.pt/>.

# WHO DO WE SHARE PERSONAL DATA WITH?

In the course of its activities, NOVA IMS shares your personal data with the following data processor:

* Arquiconsult, headquartered at Avenida Comendador Ferreira de Matos, No. 793, 1st Floor, Room C1, 4450-125 Matosinhos, which is responsible for managing NOVA IMS’s Microsoft Dynamics 365 CRM platform.

# HOW LONG DO WE RETAIN PERSONAL DATA?

NOVA IMS has established the following data retention periods:

1. Data used for account creation on the Application Portal is retained for 25 years after the account is created;
2. Data used for the evaluation and selection of applicants is retained for 25 years;
3. Data used for communications related to the user’s application process is retained for 25 years;
4. Data used for marketing communications is retained for 25 years;
5. Data used for the preparation of management support reports is retained for 30 years.

Regarding communications, they will cease once there are no longer any legitimate needs related to the application process or associated information, or when the given consent is withdrawn. This policy is intended to safeguard privacy and avoid unnecessary communications, in accordance with applicable regulations.

# CHANGES TO THIS PRIVACY NOTICE

This privacy notice may be updated. Data subjects will be informed within a reasonable timeframe if the changes represent a substantial alteration in the nature of the processing – such as a change in the purposes of processing, a change in the identity of the data controller, or an expansion of the categories of recipients.