< PRIVACY && COOKIES POLICY / >

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This document sets out the PRIVACY and COOKIES policies (the "Policy") of CODE FOR ALL, LDA – a company incorporated and existing in Portugal with company's identification number 510894160, head offices located at Praia Links, Rua de São Salvador, 42, 9760-440 Praia da Vitória, Ilha Terceira, Açores, Portugal – its successors and permitted assigns (hereinafter "<ACADEMIA DE CÓDIGO_>") applying when someone ("USER") transmits to or provides to <ACADEMIA DE CÓDIGO_> any personal data of his/her own or any other identified or identifiable individuals ("Data") including when USER DIRECTLY OR INDIRECTLY transmits to <ACADEMIA DE CÓDIGO_>, by means of any Forms, through/at the <ACADEMIA DE CÓDIGO_>'s website and/or in connection with the use of <ACADEMIA DE CÓDIGO_>'s products/services (hereinafter collectively and indistinctively, the "BOOTCAMPS").

To the far extent that USER is acting in the name of an organization, this Policy applies to Data uploaded or disclosed to <ACADEMIA DE CÓDIGO_> and may include the name, email and telephone number indicated in the Contact Form available at <ACADEMIA DE CÓDIGO_>'s website and/or their association to requests of information sent to/by <ACADEMIA DE CÓDIGO_>.

If USER has any reservations, doubts or objections to this Policy, USER should resume and exit from the BOOTCAMPS refraining from their use and/or transmitting any Data to <ACADEMIA DE CÓDIGO_>.

<ACADEMIA DE CÓDIGO_> reserves the right to change this Policy at any time without prior notice. Any amended Policy will be integrated herein effective as from the date of its posting at the website www.academiadecodigo.org. Continued access and use of the BOOTCAMPS implies that USER is aware, acknowledges and accepts this Policy as amended and in force from time to time.

Last revised and applicable as from June 28th, 2019.

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What Data is collected and how?

USER may visit the website of <ACADEMIA DE CÓDIGO_> anonymously at all times without a registration, provided however that certain BOOTCAMPS may use Cookies. // The latest version of <ACADEMIA DE CÓDIGO_>'s Cookies Policy is available **here**.

All Products and services supplied/performed by <ACADEMIA DE CÓDIGO_> are for the prosecution and purposes related to the continuous education and knowledge improvement of individuals in the field of Computer Programming.

As far as the USER is concerned, this Policy applies to the Data loaded or shared to <ACADEMIA DE CÓDIGO_> – without prejudice of others – in the Online Registration Form of <ACADEMIA DE CÓDIGO_>'s bootcamps and it can include the name, gender, date of birth, ID card number, address, email, telephone number, current employment status, academic degree, academic institution, professional qualifications, position held and performed functions.

For more information about the bootcamps' application process, please revert to the information available at the <FAQ Yourself> area of the website.

<ACADEMIA DE CÓDIGO_> ONLY COLLECTS DATA THAT IS VOLUNTARILY DISCLOSED AND SUBMITTED BY USER AND THAT USER AUTHORISES <ACADEMIA DE CÓDIGO_> TO PROCESS ACCORDING TO THE TERMS AND TO THE EFFECTS OF LAWS IN FORCE AND SUBJECT TO THE HEREIN POLICY. USER MAY REFUSE TO GRANT CONSENT FOR DATA COLLECTION, STORAGE, PROCESSING AND/OR MANAGEMENT AND A PREVIOUSLY GRANTED CONSENT MAY BE WITHDRAWN AT ANY TIME AT USER'S FAIR AND SOLE DISCRETION.

TO THE FAR EXTENT THAT CERTAIN PURPOSES PURSUED BY <ACADEMIA DE CÓDIGO_> (v.g. Marketing or Advertisement activities) DEPEND ON THE CONSENT BY USER FOR THE COLLECTION AND PROCESSING OF HIS/HER DATA, USER IS

FREE TO EITHER CONSENT OR NOT TO THE DATA PROCESSING ACTIONS BY <ACADEMIA DE CÓDIGO_> AS WELL AS TO WITHDRAW A PREVIOUSLY GRANTED CONSENT AT ANY TIME AT HIS/HER SOLE AND FAIR JUDGEMENT AND CRITERIA.

Refusal to grant consent or the withdrawal of a previously granted consent may prevent <ACADEMIA DE CÓDIGO_>'s Backend to complete User's enrolment and registration and in some cases making it impossible for User to purchase or subscribe any of <ACADEMIA DE CÓDIGO_>'s products/services, to provide or receive feedback as well as it may prevent any activities by <ACADEMIA DE CÓDIGO_> for which consent may be a necessary condition (for instance, and without limitation, <ACADEMIA DE CÓDIGO_> may be prevented from sending notices about campaigns, discounts available, new offerings, product lines, or other information by SMS or mailing).

Lack of Reading and accepting this Privacy Policy may prevent <ACADEMIA DE CÓDIGO_>'s Backend to complete User's enrolment and registration requested by user or may prevent the digital and automatic processing of Data, thereby turning it impossible to acquire a product or a service (including participation at a bootcamp), the qualification for any initiative or event, providing of feedback in respect of any application, process or registration status requested by digital means. In any of latter said events the USER should be directed to alternate means made available by <ACADEMIA DE CÓDIGO_> (if/as available and as made available).

Is all data the same as Data?

No. <ACADEMIA DE CÓDIGO_> may also collect and process company's data, which may not be entirely covered by the stipulations of this Policy ("Corporate Data").

<ACADEMIA DE CÓDIGO_>'s Corporate Clients, partners, suppliers and distributors, expressly grant to <ACADEMIA DE CÓDIGO_> a fully paid, royalty free, non-exclusive, sub-licensable, perpetual, worldwide license for <ACADEMIA DE CÓDIGO_> to collect and process Corporate Data of the Corporate Client in question

for the intended business purposes of <ACADEMIA DE CÓDIGO_> including those relating to the compliance of a legal obligation, performing a contract, pursuing a legitimate interest such as collection of client's feedback, promotional and marketing activities, sales management, benefit's management, amongst others that lawfully are associated to its business activity.

Unless as otherwise imposed by Law, whenever any third-party entities contact <ACADEMIA DE CÓDIGO_> compelling it to disclose Corporate Data of its Corporate Clients, partners, suppliers and/or distributors (1) <ACADEMIA DE CÓDIGO_> shall promptly communicate such compelled disclosure to the Corporate Clients, partners, suppliers and distributors in question; (2) <ACADEMIA DE CÓDIGO_> shall seek that the entities in question contact directly the Data owner and to such effect shall only provide basic contact data, as available to <ACADEMIA DE CÓDIGO_>; (3) <ACADEMIA DE CÓDIGO_> shall reasonably effort not to grant access to excessive information considering the one that was compelled from <ACADEMIA DE CÓDIGO_> to be disclosed; (4) <ACADEMIA DE CÓDIGO_> shall effort – to the far extent lawfully permitted and without additional costs – to prevent any entities to access directly to stored Data, encryption keys used to secure or the confer the ability to break such encryption.

What are Cookies and how do they work?

Cookies are alphanumeric identifiers that <ACADEMIA DE CÓDIGO_> may transfer into the devices' hard drives to enable <ACADEMIA DE CÓDIGO_>'s systems to recognize a browser and tell <ACADEMIA DE CÓDIGO_> how and when the BOOTCAMPS are being visited and by how many people, also permitting to enhance USER experience (UX) ("Cookies"). Cookies may keep track of USER's movements within the BOOTCAMPS, help to navigate or advise navigation, remember navigation history, theme selection, preferences and other customization functions (if/as available).

Certain <ACADEMIA DE CÓDIGO_>'s business partners and Clients may also use cookies at their own BOOTCAMPS without any control on the part of <ACADEMIA DE CÓDIGO_> in what concerns their privacy policies (if any).

Some of the Cookies used by <ACADEMIA DE CÓDIGO_> enable the interconnection of data flows with social media sites and operators such as the Facebook, Instagram or YouTube:

✓ Social Media Pixel used for Facebook, YouTube and Instagram

Social Media operators use their own Cookies and may use cookies, web beacons and other storage tools so as to collect and receive data from Website and other internet environments and eventually use such information for service measurement or direct any marketing campaigns or publicity.

<ACADEMIA DE CÓDIGO_> warns that it does not exert an influence nor controls by any means the Social Media sites and their operators nor has any influence on their privacy policies and/or data security procedures, means and/or resources used. USER discretion is advised prior to accessing and using Social Media.

<ACADEMIA DE CÓDIGO_>'s website and all of its sub-domains may use Cookies from the following categories:

Preference Cookies	Enabling information collection about user preferences such as his/her language or his/her origin territory. Loosing this kind of information stored in a preferences cookie may cause the user experience less functional although it does not prevent the CHANNEL from functioning.
Security Cookies	Enabling the registered USER to login with his/her Credentials and preventing fraudulent use of the same as well as it aids in the data protection of USER in connection with his/her access and use of the BOOTCAMPS.

Procedural Cookies	Enable the CHANNEL to properly function and to have the services offerings enabled as well as it aids the USER to navigate and access to certain secure areas. Blocking these Cookies may prevent the CHANNEL from properly function.
Publicity Cookies (Dependant on USER CONSENT)	Cookies we use are intended to make publicity more relevant to the USER, notably by improving the reporting and avoiding the display of already seen ads and notices. The cookies help remembering USER's recent searches and his/her past interactions with the BOOTCAMPS showing search results or summaries of past visits and activity. NB.: Our BOOTCAMPS include presence in certain Social Media Sites such as Facebook, LinkedIn, Twitter, Instagram or YouTube. These BOOTCAMPS use cookies of their own (as stated above) to show relevant publicity and/or to address marketing campaigns. USER is advised to search by his/her own means and learn about the privacy and cookies policies of Social Media sites to the far extent that although <ACADEMIA DE CÓDIGO_> is present therein a refusal to consent on marketing/publicity activities only directed to <ACADEMIA DE CÓDIGO_> has no impact and may not affect the publicity or marketing activities generating from or through such Social Media sites.
Session Cookies	These Cookies collect information on how USER interacts with the BOOTCAMPS and such may include most frequently visited sites any reporting on error messages received from said pages/sites. The so called "session status cookies" help us improving our services and the navigation experience.

	To block or exclude these cookies may not have an impact on USER's experience.
Analytics Cookies	These cookies enable us to understand how USER interacts with our BOOTCAMPS and how he/she engages with our services/products. The cookies collect information and statistics usage data without identifying the individual users.

Cookies used by <ACADEMIA DE CÓDIGO_> may include one or more cookies from the above stated categories and PRESENTLY are the following:

- ✓ Google Analytics® (i.e., _ga, _gid) an analytics tool by Google® enabling the level of engagement and loyalty with the website and its functionalities;

Cookies used by <ACADEMIA DE CÓDIGO_> do not directly collect or process USER Data.

<ACADEMIA DE CÓDIGO_> recommends that USER leaves the Cookies activated because Cookies allow a better use of Website's functionalities. Total refusal of Cookies or their entire removal may cause the Website not to proper function or block certain functionalities disabling them. However, where the USER does not wish to accept Cookies, USER may manage his/her preferences.

USER may configure the equipment so that USER is warned every time a Cookie is deposited on its drive and may deactivate all Cookies through the navigation tool (v.g. Google Chrome, Mozilla Firefox, Internet Explorer). USER may also choose to refuse, delete or accept Cookies through an appropriate selection of functions in the "options" or "preferences" sections of the web browser. USER should further navigate the "Help" menu of the web browser to properly understand and configure its Cookies preferences.

In order to further understand what Cookies are all about, understand what Cookies were installed and how can they be managed and/or deleted by USER please visit _www.allaboutcookies.org_.

By using the BOOTCAMPS, USER consents to his/her Data being processed by <ACADEMIA DE CÓDIGO_> and its partners according to USER's Cookies Preferences except where the USER's express is required, in which case such processing may only occur to the far extent there's such a consent and for as long as it is validly granted by USER.

Anonymous and anonymized Information: How does it work?

<ACADEMIA DE CÓDIGO_> may share generic aggregated demographic information not linked to any Data for CHANNEL content and planning management, scientific investigation, analysis of target population, content improvement and correction, impact measurement of solutions portfolio (services and products) as well as to improve learning content.

Non-personal identification information may include the browser name, device name, type of computer and technical information, connectivity information such as the OS and/or the ISP used or other similar non-personal technical information. Whenever <ACADEMIA DE CÓDIGO_> shares such information it shares it in a distinctive database so that information remains anonymous at all material times and cannot be reverted to be understood and processed as Data.

What <ACADEMIA DE CÓDIGO_> processes my Data for?

<ACADEMIA DE CÓDIGO_> may process Data for the following purposes:

- ✓ Technical and of Technical improvement – To enable <ACADEMIA DE CÓDIGO_> and its partners and subcontractors to collect service feedback as well as to operate and maintain the BOOTCAMPS and to technically support them, thereby improving the USER experience;

- ✓ Usability – To make the BOOTCAMPS more relevant and easier to navigate by USER and/or to help USER solve any navigation problems;
- ✓ Newsletters and generic information – To send periodic emails If USER decides to register and/or join <ACADEMIA DE CÓDIGO_>'s newsletters or non-solicited mailing (if/as available) and PROVIDED HOWEVER THAT USER HAS SO PROVIDED HIS/HER CONSENT.
- ✓ Marketing and Commercial – To send alerts to USER on products, services, new products, campaigns, promotions, news, special offers that may be interesting for the USER PROVIDED HOWEVER THAT HE/SHE HAS CONSENTED;

If USER wishes to unsubscribe from future emails, push-ups or news from <ACADEMIA DE CÓDIGO_>, he/she may follow the instructions contained in the message for removal from unsolicited mailing lists.

However PLEASE NOTE that despite such fact, you may still continue to receive e-mails from the System (v.g. referring to passwords) and legal notices (v.g. updates, new versions of our policies and terms and conditions) as well as third party messaging out of the control of <ACADEMIA DE CÓDIGO_> and over which it has no means to exert influence or control (v.g. Social Media and their partners).

How <ACADEMIA DE CÓDIGO_> protects USER Data?

<ACADEMIA DE CÓDIGO_> shall process Data only in accordance to this Policy and the European Laws in force – as amended from time to time- within the European Union.

<ACADEMIA DE CÓDIGO_> adopted appropriate technical and organizational measures intended to protect Data against accidental loss, destruction, or alteration; unauthorized disclosure or access; or unlawful destruction.

NOTWITHSTANDING THE LATTER PLEASE BE ADVISED THAT <ACADEMIA DE CÓDIGO_> CANNOT ENSURE FULL NETWORK SECURITY OVER THE WEB AND USE OF THE INTERNET IN GENERAL AND/OR OF THE BOOTCAMPS MAY EXPOSE USER

AND DATA TO RISKS SUCH AS IDENTITY THEFT, FRAUD OR FRAUDULENT ACTION BY THIRD PARTIES OUT OF <ACADEMIA DE CÓDIGO_>'S CONTROL POTENTIALLY ABLE TO CAUSE USER AN IRREPARABLE LOSS AND/OR DAMAGE OF UNQUANTIFIABLE IMPACT.

USER'S DISCRETION ON THE USE OF THE INTERNET, THE BOOTCAMPS AND ON THE DISCLOSURE OF USER DATA AS WELL AS ON THE PROVIDING OF ANY CONSENTS AND THEIR CONSCIOUS MANAGEMENT, IS STRONGLY ADVISED.

To whom may <ACADEMIA DE CÓDIGO_> disclose Data?

<ACADEMIA DE CÓDIGO_> is not in the business of selling, trading, or renting Data and therefore exchange or sharing of Data with third parties is strictly limited and is only made in accordance to the applicable laws subject however to the following:

- ✓ <ACADEMIA DE CÓDIGO_> may share Data in within the scope of its activity and for the fulfilment of legal and contractual obligations towards the Data owners;

- ✓ <ACADEMIA DE CÓDIGO may share Administrator (Admin) data for purposes of the BOOTCAMPS' security and/or fraud prevention.

- ✓ In what refers to the Website operation, <ACADEMIA DE CÓDIGO_> may outsource certain administration and support activities from third parties. Any share of Data with such third parties shall be on a STRICT NEED TO KNOW basis as necessary for the tasks outsourced.

- ✓ Every and all information disclosed will ALWAYS be in strict compliance with the consent provided by You and only as permitted by Law.

- ✓ <ACADEMIA DE CÓDIGO_> shall not disclose Data or the confidential information about the Institutional Clients to entities out of <ACADEMIA DE CÓDIGO_>'s control and shall not provide said same information other than to its business partner network in strict connection with its activity, except if (1) the client allowed or determine <ACADEMIA DE CÓDIGO_> in a different way; or (2) if <ACADEMIA DE CÓDIGO_> is subject to such disclosure by law; or (3)

Disclosure is imposed by judicial or a public entity with jurisdiction over <ACADEMIA DE CÓDIGO_>.

Should any authorities or law enforcement agent contact <ACADEMIA DE CÓDIGO_> with a demand for Your Data except as may be prohibited by Law (1) <ACADEMIA DE CÓDIGO_> will promptly notify You and provide You with a copy of the demand/order; (2) <ACADEMIA DE CÓDIGO_> will attempt to redirect authorities to You – by providing them with Your basic contacts information – so that they may obtain information directly from You; (3) <ACADEMIA DE CÓDIGO_> will reasonably effort not to provide information in excess of that required to satisfy the compelled disclosure order; (4) <ACADEMIA DE CÓDIGO_> shall to the maximum extent permitted procure not to provide (i) direct, indirect, blanket or unfettered access to Your Data; (ii) the platform encryption keys used to secure Your information or the ability to break such encryption.

<ACADEMIA DE CÓDIGO_> will not disclose Administrator Data outside <ACADEMIA DE CÓDIGO_> or its controlled subsidiaries, except for legal or judicial determination.

- ✓ <ACADEMIA DE CÓDIGO_> may share Data for its activity's intended purposes and in connection with contractual obligations of <ACADEMIA DE CÓDIGO_> before the USER;
- ✓ <ACADEMIA DE CÓDIGO_> may share Data with business partners within the scope of <ACADEMIA DE CÓDIGO_>'s activity. In order to get to know <ACADEMIA DE CÓDIGO_>'s Partners please contact us using the Contact Form provided at the [Website](#)
- ✓ Administrator data for purposes of security management of BOOTCAMPS and/or for the active fraud and attack prevention;
- ✓ Data storage operations being contractually guaranteed before third party providers the compliance with the terms and conditions of the herein Policy;
- ✓ As far as the BOOTCAMPS are concerned, <ACADEMIA DE CÓDIGO_> may source from third party providers the support of certain activities of website and sub-site (landing pages) building and management, as well as their administration and updating. Any Data shared with such third parties shall be STRICTLY AS NEEDED for the purposes of rightful rendering of such support

services by the third-party providers in question for said Website and sub-sites' support and maintenance.

Any and all disclosure of Data (if any) shall be SOLELY in strict conformity with the consents provided by USERS (if/when applicable), any other legitimacy as provided by Law and in conformity to this Privacy Policy and the information management system in place at <ACADEMIA DE CÓDIGO_>.

<ACADEMIA DE CÓDIGO_> shall not disclose Data or confidential information of EU citizens into non-EU territories or to companies without the control of <ACADEMIA DE CÓDIGO_> except (1) in respect of Information Systems Cloud hosting services, provided however that on such cases safety and organizational measures by cloud providers were granted to <ACADEMIA DE CÓDIGO_> in terms consistent with this Policy and the laws in force; (2) if USER so requires, consents or determines <ACADEMIA DE CÓDIGO_>; (3) as deriving from interaction of USERS with <ACADEMIA DE CÓDIGO_>'s BOOTCAMPS – which by nature operate multi-territorially – or social media pages (if any) as well as any online activity; (4) as provided for in Law or as imposed by a court or administrative order or another public determination by an entity or officer with jurisdiction over the <ACADEMIA DE CÓDIGO_> outside the EU; (5) in case of intra-group and/or partners transmissions pursuant to the terms of the Law and strictly as necessary subject to a written agreement strictly as necessary and subject to the laws in force.

<ACADEMIA DE CÓDIGO_> will not disclose Administrator Data outside <ACADEMIA DE CÓDIGO_> or its controlled subsidiaries, except for legal or judicial determination.

Where does <ACADEMIA DE CÓDIGO_> process my Data?

Except as herein described – or as it may be imposed by Law – Data may be processed only within the European Union.

<ACADEMIA DE CÓDIGO_> abides by the European Union Data Privacy laws regarding the collection, storage, processing, management and retention of Data

from European Union national or citizens which data is processed within the European Union.

Who is the Data Controller?

As far as BOOTCAMPS are concerned, CODE FOR ALL, LDA (as described herein) is the Data Controller of Data collected from individual bootcamp's participants.

Should You intend to exert any of Your rights to access, rectify or delete Your Data please contact:

<ACADEMIA DE CÓDIGO_>

Praia Links // Rua de São Salvador, 42

9760-440 Praia da Vitória

Ilha Terceira - Açores

Portugal

Email: helloworld@academiadecodigo.org

What are my Rights?

USER has the right to access, rectify and/or eliminate (totally or partially) his/her Data, the right to be informed on the processing activities, the right to oppose or limit the processing activities, portability right (in certain cases) and any others as conferred by Law as in force from time to time.

The USER is entitled to claim or complain directly before the Data Protection supervising or regulatory authority in Portugal, which is the CNPD- *Comissão Nacional de Proteção de Dados*, which contacts shall be provided upon request.

<ACADEMIA DE CÓDIGO_> shall respond any requests by USERS pursuant to the herein terms and the provisions of the Law.

For how long is my Data stored and processed?

<ACADEMIA DE CÓDIGO_> retains USER Data until the longest of:

    (i)   The term within which the USER is registered in <ACADEMIA DE CÓDIGO_>'s Systems associated to the fulfilment of a contractual/ pre-contractual obligation, the fulfilment of a legal obligation, the legitimate pursue of a business interest pursuant to the retaining timelines defined by <ACADEMIA DE CÓDIGO_>;

    (ii)   For as long as a consent by the USER lasts for a specific purpose and whenever the consent is the legitimate cause for Data processing.

How is my Data deleted?

Data is deleted through safe deletion procedures described in internal codes and policies in force at the <ACADEMIA DE CÓDIGO_>.

Digital Data may be anonymised whenever the removal or deletion of such Data from our systems may not reconcile on a reasonable basis with the data quality of the database in which they are located; notably, whenever the deletion or removal may imply a considerable risk of data breach to other data stored on same systems or part of same database and the latter are to remain integrate and active (impacts on data integrity and/or on systemic data quality feasible or anticipated).

Data in physical media shall be eliminated by irreversible destruction methods.

What Laws and Jurisdiction applies?

Data will be processed solely according to this Policy and the Laws in force. No further laws shall apply to Data. Any disputes hereunder shall be submitted and resolved exclusive by the Portuguese Courts, which territorial and material jurisdiction will be determined according to the procedural laws in force.

Last Revised and in force as of June 28th 2019