

## PRIVACY POLICY

### NOVA IMS WEBSITE

#### SCOPE



This privacy policy applies to the processing of personal data of users of the NOVA Information Management School ("NOVA IMS") website.

#### WHO ARE WE?

NOVA University of Lisbon will process personal data, a legal entity with registration number 501559094, headquartered at Campus de Campolide, 1099-085 Lisbon, specifically by NOVA IMS, an autonomous unit of NOVA University of Lisbon.

NOVA IMS assumes the role of data controller in the processing of the personal data, as defined and utilised in accordance with personal data protection legislation.

#### WHAT ARE THE PURPOSES OF PERSONAL DATA PROCESSING?

NOVA IMS processes personal data for the following purposes:

- Share relevant information with website users, including institutional content, informational materials, brochures, initiatives, events, and academic offerings from NOVA IMS;
- Provide the contact details of NOVA IMS representatives to facilitate direct communication with users seeking more information;
- Manage and process applications and admissions to academic programmes, including PhDs, master's degrees, postgraduate programmes, executive education, and other courses, as well as applications to NOVA IMS research centres;
- Manage requests for information sessions on academic programmes and services;

Cofinanciado por:





- e) Manage registration in events and academic or scientific programmes promoted by NOVA IMS;
- f) Manage the publication and dissemination of academic and professional opportunities related to NOVA IMS and its partners;
- g) Assess and manage spontaneous applications in the context of recruitment processes;
- h) Receive, analyse, and respond to compliments, suggestions, and complaints;
- i) Ensure the development, maintenance, operation, and security of the website.

Any reuse of personal data for a purpose other than its original intended use is assessed in light of the criteria defined in Article 6(4) of the GDPR.

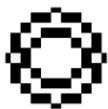
### **WHAT IS THE LEGAL BASIS FOR PERSONAL DATA PROCESSING?**

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

- The legitimate interests pursued by NOVA IMS or by third parties, unless the interests or fundamental rights and freedoms of the data subject which require the protection of personal data prevail;
- The performance of a contract to which the data subject is a party, or for the purpose of carrying out pre-contractual steps at the request of the data subject;
- The fulfilment of legal obligations of NOVA IMS;
- The public interest pursued by NOVA IMS.

Where none of the above conditions of lawfulness are able to support the data processing operation, Nova IMS will only process personal data if it has obtained the consent of the data subject to process their personal data for specific, explicit, and legitimate purposes.

The data subject can request information about the criteria used to determine legitimate interest by emailing: [privacidade@novaims.unl.pt](mailto:privacidade@novaims.unl.pt).



## TO WHOM WE TRANSMIT PERSONAL DATA?

In the course of its activities, NOVA IMS transmits your personal data to subcontractors, other data controllers, and joint controllers. These entities include the following:

- **Technology and web hosting service providers** – To ensure the development, maintenance, operation, and security of the website, guaranteeing its functionality and protection against cybersecurity incidents;
- **Communication platforms and service providers** – For managing information requests, scheduling sessions, and facilitating direct contact between users and NOVA IMS representatives;
- **Event and academic programme organisers and partners** – For managing registrations and participation in events or initiatives organised or co-organised by NOVA IMS and other institutions, including other organic units of the Universidade NOVA University of Lisbon;
- **Web analytics and optimisation service providers** – For collecting and analysing user navigation and interaction data, including the use of tools such as Google Analytics, subject to user consent. These services enable NOVA IMS to improve user experience and optimise its digital services continuously;
- **Competent authorities** – Whenever legally required, namely for compliance with legal obligations related to data protection, digital accessibility, and information security.

## DO WE TRANSFER PERSONAL DATA OUTSIDE THE EEA?

NOVA IMS may transfer personal data to countries outside the European Economic Area (EEA), in accordance with the General Data Protection Regulation. Where the destination countries do not offer a level of protection equivalent to that of the European Union, NOVA IMS ensures that adequate safeguards are in place, such as verifying the existence of an adequacy decision by the European Commission or, in its absence, entering into Standard Contractual Clauses approved by the Commission.

You can find more information about these safeguards at [privacidade@novaims.unl.pt](mailto:privacidade@novaims.unl.pt).



## **HOW LONG DO WE KEEP PERSONAL DATA?**

NOVA IMS keeps personal data for the period necessary to fulfil the purposes for which it was collected. To this end, a retention schedule has been established, indicating the applicable periods for each purpose. For more information on retention periods, please contact us using the methods outlined in this policy.

## **WHAT ARE THE RIGHTS OF DATA SUBJECTS?**

The law grants the data subject a set of rights that can be exercised at any time. These rights include the right to object, often used in relation to certain types of communications, as well as the right of access, erasure, restriction of processing, and rectification. Additionally, the data subject has the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent that was given before its withdrawal.

The data subject can exercise these rights by emailing [privacidade@novaims.unl.pt](mailto:privacidade@novaims.unl.pt). You can also contact NOVA's Data Protection Officer at [dpo@unl.pt](mailto:dpo@unl.pt).

The data subject also has the right to lodge a complaint with the Portuguese Supervisory Authority, the National Data Protection Commission (CNPD), at <https://www.cnpd.pt>.

## **CHANGES TO THIS PRIVACY POLICY**

This privacy notice may be updated, in which case data subjects will be informed within a reasonable time when the changes reveal a fundamental change in the nature of the processing, such as a change in the purposes of the processing, a change in the identity of the controller, or an extension of the categories of recipients.

**Version 1 | Last updated on 27 August 2025**