



## Data Protection and GDPR Policy 11/2025

### Introduction

TropicalAstral Lda processes personal data in the context of digital marketing, language training and EU-funded projects. We are committed to complying with the General Data Protection Regulation (GDPR) and relevant Portuguese data protection laws.

### 1. Purpose

This policy explains how TropicalAstral:

- Collects, uses and stores personal data
- Protects the rights of data subjects
- Ensures secure handling of personal information

### 2. Scope

This policy applies to all personal data processed by TropicalAstral, including:

- Staff, freelancers and interns
- Clients and project partners
- Learners and training participants
- Newsletter subscribers and website users

### 3. Principles

TropicalAstral follows these data protection principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation – data collected for specific, explicit purposes
3. Data minimisation – only what is necessary is collected
4. Accuracy – data kept up to date where needed
5. Storage limitation – data is not kept longer than necessary
6. Integrity and confidentiality – appropriate security of personal data

### 4. Types of data collected

Depending on the activity, we may process:

- Identification data (name, organisation, role)
- Contact data (email, phone, address)
- Participation data (event attendance, courses, project activities)
- Financial and contractual data related to services and projects
- For some EU projects, background information relevant to inclusion priorities (e.g. fewer opportunities), always with clear consent and minimisation.

We do not collect sensitive data unless explicitly required by a project and with appropriate legal basis and safeguards.



## 5. Legal bases

TropicalAstral processes data based on:

- Performance of a contract or preparation of a contract
- Compliance with legal obligations (e.g. accounting, EU project documentation)
- Legitimate interests (e.g. maintaining a professional contact list)
- Consent (e.g. newsletters, photos, or optional profiling information)

## 6. Data subject rights

Individuals whose data we process have the right to:

- Access their personal data
- Request correction or deletion
- Restrict or object to processing in certain cases
- Withdraw consent where processing is based on consent
- Lodge a complaint with the relevant Data Protection Authority

Requests can be sent to the company's main contact email, clearly indicating "Data Protection" in the subject.

## 7. Data security

- Access to personal data is limited to staff who need it for their tasks.
- Devices are password-protected and updated regularly.
- Cloud services used for storage and communication are chosen with care for security and GDPR compliance.
- Personal data in paper form (if any) is stored securely and disposed of by shredding.

## 8. Data retention

- Project-related personal data is kept for the period required by the funding body (e.g. audit periods), then securely deleted or anonymised.
- Accounting records are kept according to Portuguese legal requirements.
- Newsletter and marketing contacts are kept until they unsubscribe or we clean inactive lists.

## 9. Data sharing and transfers

- Personal data is shared with project partners or funders only when necessary and in line with grant agreements.
- We will not sell personal data to third parties.
- Where data is transferred outside the EU/EEA, we will ensure appropriate safeguards, in line with GDPR requirements.

## 10. Monitoring and review

This policy will be reviewed regularly to reflect changes in legislation, tools and working methods.