PRIVACY AND DATA PROTECTION POLICY

15/10/2026

https://arrow4d.pt | https://niotantek.com | geral@arrow4d.pt

Contents

1 INTRODUCTION

1.1 Purpose of the document

1.2 Scope

1.3 Validity

1.4 Review and assessment

1.5 Reference documents

2 PRIVACY POLICY

2.1 Controller

2.2 Collection of personal data

2.3 Personal data processed

2.4 Purposes of processing

2.5 Processing on the niotantek.com website

2.6 Retention periods

2.7 Rights of data subjects

2.8 Complaints

2.9 Security measures

2.10 Transfers of personal data

2.11 Processors

2.12 Security breaches or loss of personal data

2.13 Cookies and local storage

2.14 Changes to the privacy policy

2.15 Signatures

Description	**PRIVACY AND DATA PROTECTION POLICY**
Company that owns the brand	**Arrow4D – Consultores de Engenharia e Geofísica, Lda**
European trade mark	**NIOTANTEK® (018808383)**
Version	v2 (replaces v1 of 3 March 2025)
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Person responsible	Samuel Neves
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Changes in this version

- Description of the personal data processing carried out on the niotantek.com website (section 2.5).
- Identification of the processors used by the website (section 2.11).
- Update on transfers of data outside the European Economic Area (section 2.10).
- New wording of the section on cookies and local storage (section 2.13).

1 INTRODUCTION

1.1 Purpose of the document

The purpose of this document is to set out the privacy policy for the services provided under the **NIOTANTEK®** brand (018808383), owned by Arrow4D – Consultores de Engenharia e Geofísica, Lda, hereinafter Arrow4D. It meets the requirements on the information to be given to data subjects under Articles 13 and 14 of the General Data Protection Regulation (GDPR).

1.2 Scope

This policy is binding on Arrow4D – Consultores de Engenharia e Geofísica, Lda (Arrow4D), as Controller of personal data, which shall take appropriate measures to provide data subjects with information about the processing in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

1.3 Validity

Any revision of this document made after the date of the last published version takes effect immediately upon publication and cancels any effect of previous versions.

If, for technical or functional reasons, the specifications described in this document cannot be applied, this shall be reported to those responsible and the necessary changes shall be made.

1.4 Review and assessment

This document will be assessed and reviewed annually or whenever necessary. The review is the responsibility of the Arrow4D Working Group.

1.5 Reference documents

The following sources were used as references for this document:

- ISO/IEC 27001:2013 - Information Security Management System;
- ISO/IEC 27002:2013 - Code of Practice for Information Security Management;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation or GDPR);
- Portuguese Law No. 58/2019 of 8 August, which implements the General Data Protection Regulation in national law;

- Portuguese Law No. 41/2004 of 18 August, on the protection of personal data and privacy in electronic communications;
- Other applicable legislation.

2 PRIVACY POLICY

The protection and privacy of personal data are a fundamental commitment of Arrow4D towards data subjects.

Arrow4D remains committed to complying with personal data protection legislation and to the privacy and security of information, in order to protect data subjects.

This Privacy and Data Protection Policy sets out, in a transparent way, the general rules for processing personal data, which are collected and processed in strict compliance with personal data protection legislation.

Links to websites outside the websites of Arrow4D or its affiliated brands are not covered by this Privacy and Data Protection Policy.

2.1 Controller

The Controller is Arrow4D – Consultores de Engenharia e Geofísica, Lda.

Registered office: NERE, PITE, Rua circular norte, sn, escritório 22, 7005-841 Évora, Portugal
Telephone: (+351) 966 167 709
General email: geral@arrow4d.pt

2.2 Collection of personal data

To provide its services, Arrow4D collects personal information through the following channels:

- Telephone;
- Websites, including the niotantek.com website;
- Information systems, including the NIOTANTEK platform (niotantek.eu);
- Post or email;
- Contact forms.

2.3 Personal data processed

Personal data are processed electronically and automatically, in line with the principle of data minimisation: only data that are adequate, relevant and limited to what is necessary to provide the

services of Arrow4D and its brands are collected.

The categories of personal data processed are:

- Identification data: name, date of birth, identity card details, nationality;
- Contact data: address, telephone number and email;
- Professional data: position, duties and employer;
- Academic and professional data: qualifications, certifications and CVs;
- Billing data: tax identification number and billing address;
- Image and sound data: in the context of events and activities;
- Digital data: the device's IP (Internet Protocol) address, including date and time of access, and technical browser signals;
- Website usage data: pages visited, where the visit came from, type of device and button clicks, processed in aggregate and only with consent.

2.4 Purposes of processing

Personal data are only processed where there is a lawful basis. Arrow4D sets out the possible lawful bases for processing personal data:

- Consent: personal data are processed with the data subject's freely given, specific, informed and unambiguous consent for one or more specific purposes;
- Performance of a contract: processing necessary for the performance of a service contract to which the data subject is party, or for pre-contractual steps taken at the data subject's request;
- Compliance with a legal obligation: where processing is necessary to comply with legal obligations to which Arrow4D is subject, personal data are processed and may be transmitted to other entities;
- Legitimate interest: where processing is necessary to handle suggestions and/or complaints, for the security of systems, and to adapt the services provided within Arrow4D's activities.

If Arrow4D intends to further process personal data for purposes other than those defined, it provides the necessary information and any other information relevant in the context, ensuring transparent and fair processing.

2.5 Processing on the niotantek.com website

On the niotantek.com website, personal data are processed in the following situations:

Purpose	Data	Lawful basis	Who processes	Retention
Answering requests sent through the contact form and sending an acknowledgement of receipt	Name, organisation, email, subject, product of interest and message	Pre-contractual steps at the data subject's request; legitimate interest in replying	Arrow4D; Resend (sending the emails)	As long as needed to reply to and follow up the request, then the applicable legal periods
Protecting the form against automated submissions and abuse	IP address and technical browser signals; irreversible code (hash) of the IP address and email, with the time of submission	Legitimate interest (security)	Cloudflare (Turnstile check); website server (submission limit)	The submission-limit codes are deleted after 24 hours
Website visit statistics	Pages visited, where the visit came from, type of device and button clicks; no cookies and no storage of the IP address	Consent ("Analytics" category of the cookie notice)	Plausible Analytics	Aggregated data, without identifying the visitor
Showing the map on the contact page	IP address, sent when the map images load	Legitimate interest	OpenStreetMap Foundation	According to the OpenStreetMap Foundation's policy

The example surveys and catalogs shown on the website, and the pages to create an account or log in, are served by the NIOTANTEK platform (niotantek.eu), which has its own terms and conditions.

2.6 Retention periods

The retention periods for personal data result from the legal and regulatory provisions that require them to be kept for a minimum period, in compliance with the periods provided for by law.

Where processing is based on your consent, we will keep the data until consent is withdrawn or until the purpose of the processing no longer exists.

2.7 Rights of data subjects

Arrow4D respects the rights of data subjects under the law and, whenever requested, guarantees:

- Right of access: to obtain confirmation as to whether personal data concerning you are being processed and, if so, to access those data and information about the data processed and the purposes;
- Right to rectification: to have personal data concerning you rectified, and to correct incomplete or inaccurate data at any time;
- Right to erasure: to have your personal data erased by the controller when a retention period has been reached or the processing is no longer lawful;
- Right to restriction of processing: to have the processing of personal data restricted, allowing it to be suspended;
- Right to data portability: to receive your personal data in a structured electronic format in order to transmit them to another entity;
- Right to object: to object to processing on grounds relating to your particular situation;
- Right not to be subject to automated decisions: not to be subject to a decision based solely on automated processing, including profiling;
- Right to withdraw consent: to withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal. On the website, consent to statistics can be changed at any time with the cookie button in the corner of the screen.

Requests can be sent by email to geral@arrow4d.pt or through the form on the contact page of the niotantek.com website. Information is provided once the data subject's identity has been duly verified.

Replies are given in writing, in clear and plain language, in a concise, transparent, intelligible and easily accessible form, within one month. This period may be extended by up to two further months where requests are complex or numerous.

2.8 Complaints

The Comissão Nacional de Proteção de Dados (CNPD) is the independent Portuguese supervisory authority for the processing of personal data, competent to monitor compliance with the GDPR and other legislation in force, in order to protect the rights, freedoms and guarantees of natural persons.

Any data subject who considers that the processing of personal data does not comply with the legislation in force has the right to lodge a complaint with the supervisory authority, under the law:

Address: Av. D. Carlos I, n.º 134 - 1.º, 1200-651 Lisboa, Portugal
Telephone: (+351) 213 928 400
General email: geral@cnpd.pt

2.9 Security measures

Arrow4D is committed to ensuring the security of the personal data made available to it, implementing appropriate technical and organisational measures to protect them, in particular against destruction, loss, alteration, disclosure, unauthorised access or any other form of accidental or unlawful processing, under the legislation in force.

On the niotantek.com website, communications are encrypted (HTTPS), the contact form is protected against automated submissions, and the access keys to external services are kept outside the public area of the server.

Technology changes constantly, so we periodically review and improve the measures in place, with security procedures suited to protecting data subjects' data against unauthorised access and disclosure.

Because data security does not rely on technology alone, we regularly train our staff, ensuring they have the necessary legal and technical knowledge whenever they handle personal information, follow recognised best practices and respect, without exception, the internal procedures defined and implemented.

2.10 Transfers of personal data

Personal data are processed, wherever possible, within the European Economic Area (EEA) and are only transmitted or made available to third parties in the cases and conditions provided for by law.

Some of the website's processors (Cloudflare and Resend, based in the United States of America, and the OpenStreetMap Foundation, based in the United Kingdom) may process data outside the EEA. In such cases, the transfer relies on an adequacy decision of the European Commission (such as the EU-US Data Privacy Framework or the decision on the United Kingdom) or on standard contractual clauses approved by the European Commission, in compliance with the applicable legal obligations.

2.11 Processors

In the course of its activity, Arrow4D uses other entities that provide sufficient guarantees of compliance with the GDPR and of security in processing the personal data to which they have access, under the applicable legislation. On the niotantek.com website, these are:

- Plausible Analytics (a European Union company): visit statistics, only with consent;
- Cloudflare, Inc. (United States of America): protection of the forms against automated submissions (Turnstile);
- Resend (United States of America): sending by email the messages from the contact form and the acknowledgement of receipt;
- OpenStreetMap Foundation (United Kingdom): map images on the contact page;
- Website hosting provider: hosting of the pages and technical server access logs.

2.12 Security breaches or loss of personal data

All security breaches or losses of personal data are reported to the person responsible for data protection without undue delay, to be recorded and to assess the measures to be taken.

In the event of a personal data breach, Arrow4D undertakes to notify the Comissão Nacional de Proteção de Dados within 72 hours, unless the breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the breach is likely to result in a high risk, the data subjects are also informed.

2.13 Cookies and local storage

Cookies are small text files stored on the device through the browser, which make it possible to recognise the browser and improve the experience of using a website. Local storage is a similar browser mechanism.

The niotantek.com website does not use advertising or profiling cookies. On the first visit, a notice lets you accept or refuse visit statistics ("Analytics"). The website keeps, in the browser's local storage, only:

- The choice made in the cookie notice;
- The website language chosen by the visitor.

Visit statistics (Plausible Analytics) are only enabled with consent and do not use cookies. Form protection (Cloudflare Turnstile) uses only the technical means strictly necessary to check that a request comes from a person.

The choice can be changed at any time with the cookie button in the corner of the screen. For more information about cookies and their use, see: www.allaboutcookies.org

2.14 Changes to the privacy policy

Given the constant evolution of technology and law, this Privacy and Data Protection Policy may be reviewed at any time to make adjustments or changes, and such changes will be duly published with the new wording in the appropriate places.

2.15 Signatures

Évora, 15 October 2026,

The management,

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