

Privacy Policy

Effective as of: 01/01/2026

This Privacy Policy explains how **Cavalcanti RealEstate Team, Unipessoal Lda.** collects, uses, and protects the personal data of individuals who visit our website and use our services.

1. Who is responsible for processing your data?

Data Controller: Cavalcanti RealEstate Team, Unipessoal Lda.

Address: Calçada do Galvão, 107 – R/C, 1400-166 Lisbon, Portugal

Tax ID (NIF): 516798162

Website: www.cavalcantiteam.com

General contact email: admin@cavalcanti.team

2. What data do we collect and how do we obtain it?

We may collect the following categories of data:

- **Identification and contact data** : name, email, phone, address.
- **Property or real estate interest data** : desired property type, budget, preferred location, information about properties you wish to sell/rent.
- **Contract and billing data** (when applicable): Tax ID, billing details, payment information (we never store complete credit card data; these are handled by the payment provider).
- **Website usage data:** IP address, device type, browser, pages visited, time spent, traffic source, via cookies and similar technologies.
- **Communications:** content of emails, contact forms, calls, or messages exchanged with us.

We collect this data when:

- You fill out forms on our website (e.g., contact request, viewing request, property evaluation request, newsletter subscription).
- You contact us by email, phone, or other channels.
- You visit and browse our website, where cookies and similar technologies are used.

3. For what purposes do we use your data and what is the legal basis?

We process your personal data for the following purposes and with the respective legal bases:

1. **Responding to contact requests and providing information about properties and services**
2. Purpose: to reply to messages, send proposals, schedule viewings, clarify questions.
3. Legal basis: **pre-contractual procedures** and/or **contract execution**.
4. **Provision of real estate services** (brokerage, purchase, sale, rental, process management, etc.)

5. Purpose: profile analysis, property presentation, negotiation, contract formalization.
6. Legal basis: **contract execution** and **compliance with legal obligations** (for example, tax or anti-money laundering, when applicable).
7. **Marketing and communication** (newsletter, campaigns, event invitations, property news)
8. Purpose: sending communications about properties, content, and services that may be of interest to you.
9. Legal basis:
10. **Consent**, when you voluntarily sign up to receive communications; and/or
11. **Legitimate interest**, in communicating with clients/prospects, always respecting your right to object.
12. **Compliance with legal obligations**
13. Purpose: retention of documents for tax and accounting purposes, responding to public authorities, among others.
14. Legal basis: **compliance with legal obligation**.
15. **Improvement of our services and website usage analysis**
16. Purpose: statistics, site performance measurement, content optimization, and security.
17. Legal basis: **legitimate interest**, and, when required, your **consent** via the cookie banner.

4. With whom do we share your data?

We do not sell your personal data.

We may share it with:

- **Service providers** acting as subcontractors, such as:
 - CRM and marketing platforms (such as HubSpot)
 - website and email hosting
 - email sending tools
 - IT and security service providers
- **Partners and other parties involved in the real estate process**, when necessary (e.g.: other agents, owners, potential buyers/tenants, lawyers, notaries), always limited to what is strictly necessary.
- **Public authorities** when required by law.

In all cases, we require these third parties to ensure an adequate level of protection for personal data and to process the data only in accordance with our instructions and applicable law.

5. International data transfers

Some of our service providers may be located outside the European Economic Area (EEA).

- there is a **European Commission adequacy decision** for the country in question; or
- **Standard contractual clauses** approved by the European Commission or other appropriate safeguards are applied.

You can request more information about these transfers by contacting us through the contacts provided above.

6. How long do we keep your data?

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected, namely:

- **Leads and contact requests:** up to 3 years after the last relevant contact, unless you exercise your right to erasure earlier.
- **Client data related to contracts and real estate transactions :** for the period required by law (e.g.: tax and accounting obligations, usually 10 years after the end of the contractual relationship).
- **Data used for marketing:** until you withdraw your consent or object to the processing; afterwards, we may keep a minimal record only to ensure we respect your choice not to be contacted again.
- **Data collected by cookies:** as specified in our cookie policy.

When the retention period ends and there is no legal obligation to retain, the data will be deleted or anonymized.

7. What are your rights?

Under the GDPR, you have the following rights regarding your personal data:

- **Right of access** – obtain confirmation of whether we process your data and, if so, access it.
- **Right to rectification** – request correction of inaccurate or incomplete data.
- **Right to erasure** – request that your data be deleted in certain circumstances.
- **Right to restriction of processing** – request restriction of processing in certain situations.
- **Right to object** – object to processing of your data when the legal basis is legitimate interest or direct marketing (including profiling related to such marketing).
- **Right to data portability** – receive the data you have provided to us in a structured, commonly used, and machine-readable format, and/or request that we transmit it to another controller, when technically possible.

To exercise any of these rights:

- send an email to: admin@cavalcanti.team
- or write to our address indicated in this policy.

We may ask you for additional information to confirm your identity.

Complaint to the supervisory authority

You also have the right to lodge a complaint with the competent supervisory authority. In Portugal, the authority is the **Comissão Nacional de Proteção de Dados (CNPD)**.

8. Cookies and similar technologies

Our website uses cookies and similar technologies to:

- ensure the basic functioning of the site (strictly necessary cookies)
- remember preferences (functional cookies)
- analyze site usage (analytical/statistical cookies, e.g., Google Analytics)
- support marketing campaigns (marketing cookies, when applicable).

When you visit our site for the first time, a **cookie banner** is presented, through which you can:

- accept all cookies
- refuse or configure only certain categories
- get more information about each type of cookie.

You can change your cookie preferences at any time through your browser settings or the options provided on the site itself.

[Optional: add reference to a separate “Cookie Policy” if one exists.]

9. Data security

We adopt appropriate technical and organizational security measures to protect your personal data against destruction, loss, alteration, disclosure, or unauthorized access, including access controls, use of services with recognized security standards, and internal information protection procedures.

Despite these efforts, no system is completely secure. Therefore, we cannot guarantee absolute security of information transmitted over the internet, but we are committed to acting diligently if we identify any security incident that may affect your personal data.

10. Updates to this Privacy Policy

We may update this Privacy Policy periodically, for example to reflect legal changes or changes in how we handle your personal data.

The most recent version will always be available on our website. We recommend that you check this page regularly to stay informed of any updates. When relevant changes are made, we may provide additional notice, via a notice on the website or by email, when appropriate.