

Privacy Policy

Sirfire

Version: April 2026 | In compliance with Regulation (EU) 2016/679 (GDPR)

1. Identity and Contact Details of the Data Controller

Controller: Diogo Filipe Ramalho Pestana, sole trader, operating under the Sirfire brand

Tax Identification Number (NIF): 248743201

Address: Rua dos Saramagos n.º 1, São Bernardino, Atouguia da Baleia, 2525-710 Peniche

Email: geral@sirfire.pt

Website: sirfire.pt

2. Personal Data Collected

2.1 Data provided by the user

- Full name
- Email address
- Telephone number
- Tax Identification Number (NIF)
- Address (where applicable for shop configuration)

2.2 Automatically collected data

- IP address and session data
- Device type and operating system
- Pages visited and session duration
- Cookie data and device identifiers (see Cookie Policy)

3. Purposes and Legal Basis for Processing

a) Account creation and management: performance of a contract (Art. 6(1)(b) GDPR).

b) Provision of the platform service and subscription: performance of a contract (Art. 6(1)(b) GDPR).

c) Payment processing: performance of a contract and compliance with legal tax obligations (Art. 6(1)(b) and (c) GDPR).

d) Service communications: legitimate interests of Sirfire (Art. 6(1)(f) GDPR).

e) Marketing and promotional communications: express and separate consent of the user (Art. 6(1)(a) GDPR). May be withdrawn at any time.

f) Compliance with legal obligations: Art. 6(1)(c) GDPR.

g) Platform improvement (anonymised data): legitimate interests of Sirfire (Art. 6(1)(f) GDPR).

4. Retention Periods

- Active account data: for the duration of the subscription and up to 2 years after account closure.
- Billing data: 10 years, pursuant to fiscal and accounting obligations.
- Access logs: maximum of 12 months.
- Consent-based data: until withdrawal of consent or erasure request.

5. Recipients and Sub-processors

Sirfire may share personal data with:

- **Eupago:** subscription payment processing, under a GDPR contract.
- **Technology infrastructure providers:** technical operation of the platform, under GDPR contracts.
- **Public authorities:** when required by law or court order.

Sirfire does not sell or transfer personal data to third parties for their own commercial purposes.

6. International Data Transfers

Where possible, processing is carried out within the EEA. Should a transfer to third countries occur, Sirfire will ensure adequate safeguards pursuant to Articles 45 and 46 of the GDPR.

7. Rights of Data Subjects

Under the GDPR, you may exercise the following rights at any time, free of charge, via email at geral@sirfire.pt:

Access (Art. 15): obtain confirmation of and access to your data.

Rectification (Art. 16): correct inaccurate or incomplete data.

Erasure / 'Right to be forgotten' (Art. 17): request deletion of your data when it is no longer necessary or consent is withdrawn.

Restriction of processing (Art. 18): restrict processing in certain circumstances.

Data portability (Art. 20): receive your data in a structured format and transmit it to another controller.

Objection (Art. 21): object to processing based on legitimate interests or for marketing.

Withdrawal of consent: at any time, without prejudice to the lawfulness of prior processing.

Right not to be subject to automated decision-making (Art. 22): not to be subject to decisions with significant effects based solely on automated processing.

Sirfire will respond within 30 days, extendable by a further 60 days in complex cases.

8. Cookies and Similar Technologies

The platform uses cookies and device identifiers. For detailed information, please consult the Cookie Policy available in the app.

9. Security

Sirfire adopts technical and organisational measures to protect personal data, including encryption in transit (HTTPS/TLS), access controls and audit logs.

In the event of a data breach, Sirfire will notify the CNPD (Portuguese Data Protection Authority) within 72 hours and will notify affected data subjects where applicable (Articles 33 and 34 of the GDPR).

10. Minors

The platform is not intended for persons under the age of 18. Data from identified minors will be immediately deleted.

11. Changes to the Privacy Policy

Significant changes will be communicated by email with reasonable advance notice. The version in force is always available in the application.

12. Right to Lodge a Complaint

You have the right to lodge a complaint with the Portuguese Data Protection Authority (CNPD):

Av. D. Carlos I, 134 - 1st floor, 1200-651 Lisboa

www.cnpd.pt