

## Privacy Policy

### PRIVACY AND PERSONAL DATA PROTECTION POLICY

On May 25th, 2018, has come into force the General Data Protection Regulation (GDPR) No. 2016/679 of the European Parliament and of the Council of 27 April 2016, which establishes and standardises the processing and protection of personal data.

The protection of your privacy is a priority to TECNOPAN, S.A. Our purpose is, not only to ensure our website users are aware of the protection and processing of personal data policies, but also that these users' security is assured in conformity with the applicable legislation, namely the General Data Protection Regulation (GDPR) No. 2016/679 of the European Parliament and of the Council of 27 April 2016.

TECNO PAN has taken the appropriate measures in the collection, processing and storage of all information, in order to avoid unauthorised access to data provided by users. Technical and organisational precautions include server hosting and communication encryption through SSL technology.

Links to third parties' sites are available in our website. We cannot control how these sites collect and process your data, and we cannot be responsible for that collection and processing, nor for the accuracy, credibility or functionality of those websites. Since the provision of links to other sites doesn't imply any assumption of responsibility in regard to those, this Privacy Policy does not apply to them either.

TECNO PAN recommends its users to adopt additional security measures, namely equipment maintenance and its correct configuration and update, protection against malicious software, firewalls and to avoid navigating on websites that don't hold guarantees of authenticity.

Finally, using this website assumes accepting the Privacy and Cookies Policy. We advise reading this Policy, which may be revised or altered at any given moment. All changes shall be disclosed on our website.

If any doubt remains about our policies, you wish to rectify the provided data, request for its erasure, withdraw your consent and/or exercise your right to object, even after having provided it to us before, please contact TECNO PAN in writing, by email or post, to one of the following addresses:

- a. rgpd@tecnopan.pt, owned by the data controller
- b. TECNO PAN, S.A. – Estrada Nacional n.º 10-1, lote 14, 2815-893 Sobreda

## 1 - WHAT IS PERSONAL DATA?

Personal data is any information relating to an identified or identifiable natural person, of any kind and regardless of format. An identifiable person is one who can be identified, directly or indirectly, namely by reference to an identifier: an identification number, location data, electronic identifiers, or to one or more elements specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

## 2 - COOKIES

Cookies are small files placed in users' browsers when they visit our Website. Cookies only collect anonymous information and do not allow access to users' computers or any personal information.

We use strictly necessary cookies for the functioning of the website, as well as functional cookies to improve the user experience. These cookies do not collect personal information and are used solely for technical purposes.

Cookie Name	Expiry	Purpose
wordpress_test_cookie	Session	Checks whether the browser accepts cookies.
wordpress_logged_in_*	Session	Keeps the user authenticated in WordPress.
wordpress_sec_*	Session	Session security for authenticated users.
wp-settings-2	1 year	Stores admin view preferences in WordPress.
wp-settings-time-2	1 year	Stores the time when WordPress preferences were set.
pll_language	1 year	Stores the user's preferred language.
cookie_notice_accepted	1 month	Records the acceptance of the cookie policy.

For more information about cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### 3 - PERSONAL DATA CONTROLLER

TECNO PAN, S.A., legal person registered under number 508104823, based in Estrada Nacional n.º 10-1, lote 14, 2815-893 Sobreda, in Alameda municipality and Setúbal district – Portugal, is the entity responsible for the collection and processing of personal data for the purposes mentioned in point 8 of this Policy.

### 4 - REQUIREMENTS FOR PERSONAL DATA COLLECTION AND PROCESSING

In accordance with Personal Data Protection Law, we collect and process data from our users with their express consent, complying with the specific purposes of that process.

The consent given by the users may be withdrawn at any given moment and free of charges. However, data shall be held during the commercial and legal relationship period and, even after, until the period of limitation of possible liabilities, which

might arise from it, and for the compliance with purposes and obligations under current legislation.

## 5 - WHAT INFORMATION DO WE COLLECT?

Regarding the purpose of data collection, the following personal information may be obtained by our website:

- a. Name
- b. Age and Date of birth
- c. Contact: address, telephone number, fax number and email
- d. Identification Numbers: citizen card, taxpayer, social security
- e. Civil Status
- f. Gender
- g. Parentage
- h. Academic Qualifications
- i. Employment History
- j. Nationality and Place of Birth
- k. Immigrant Status (in case a work permit is needed)
- l. Bank Information: BIN, IBAN and SWIFT code
- m. Company represented
- n. Information necessary and relevant for assessing skills of candidates for Collaborator positions, specifically professional experience and academic qualifications.
- o. Financial information for analysis purposes of Clients' payment conditions.

Personal information collected by TECNO PAN is always provided voluntarily by our website users, namely when they complete a form or subscribe to a newsletter.

TECNO PAN also collects anonymous information when users access the website, which might include type of device, operating system, browsers used to access the site, geographical location, visit duration and number of pages visited. However, it's not possible to link these data to individual users.

## 6 - HOW DO WE USE THIS INFORMATION?

### A. Personal Data Storage Period

The collected data storage period depends on the type of information. We only storage personal information if we have a legitimate and continuous business need. In case of absence of such need, TECNO PAN will erase or make your information anonymous. In the event that is not possible, we will safely file and isolate these data, until its erasure is authorised.

Personal data regarding the submission of proposals, budgets or information related to new products and/or services, shall be stored for a period of one year after the last contact with the data subject, without prejudice to extended deadlines if the situation warrants (respecting the principle of proportionality of the situation in question), namely to safeguard the users' rights and also, TECNO PAN's rights.

We also store information obtained by cookies, and other monitoring technologies, for a maximum period of one year, starting the date that information was created.

We will also erase your information at any given moment, as long as you submit a request.

## B. Disclosure of Personal Data to Third Parties

TECNO PAN never sells your personal information. All the information we collect is for our exclusive use. Therefore, we commit not to sell, trade, rent or share these data with third parties without the user's consent, except if legally obliged and/or by court decision, and only in compliance with our obligations.

## C. Use of Personal Information

Besides the use already identified on this Privacy Policy, TECNO PAN may use your personal information to:

- Improve your experience using our website
- Reply to contact requests
- Send information related to changes to our Privacy and Cookies Policy.

Our legal basis to collect and process your personal information will depend on the type of data and specific context in which they were collected. However, this information shall be collected only with your consent, when it's needed to celebrate a contract with you, or when processing it is in our legitimate interest and cannot be revoked by your right to data protection or other rights and fundamental freedoms. In some cases, we might be legally obliged to collect your personal information.

If we request you to provide personal information for the purpose of complying with a legal obligation or to enter into contract with you, we shall make it very clear and inform you if this information is strictly necessary or not (as we will inform you

of the possible consequences for the lack of these data). Similarly, if we collect and use your personal information under our legitimate interests (or third parties' interests), we shall make these very clear in due course.

#### D. Use of Browsing Information

We use browsing information to improve our website. This information might also be used, isolated or together, with your personal information to provide you personalised content about TECNO PAN.

#### E. Clients' Testimonials and Comments

TECNO PAN might publish clients' testimonials and comments on its website, which might contain personal information. Each client's consent for the publication of their name and testimonial shall be given through an email contact.

#### F. Personal Information Security

We use a variety of technologies and security procedures to protect your personal information from unauthorised access, use and disclosure.

We host the collected data in servers on a controlled and secured environment, protected from undue access or use. All your information is protected by physical, technical and organisational measures.

#### G. Social Media Tools

Our website has embedded tools related to social media. These tools might record your IP address, the pages you visit on our website or even activate a cookie allowing the correct function of the tool.

Social media Tools and Apps are hosted by third parties or directly on our website. This Privacy Policy does not apply to those tools. Your interactions with these tools are regulated by the standards of the companies that provide those services.

## 7 - CLIENTS' RIGHTS REGARDING THEIR PERSONAL DATA

In accordance with legislation in force, there's a set of rights you are entitled to enforce by TECNO PAN, from the moment we collect your data and at any given moment:

- a. Right to Access: allows you to obtain information regarding data processing and their characteristics (namely type of data, purpose of processing, to whom the data is going to be disclosed, storage periods and which data are mandatory or optional to provide)
- b. Right to Rectify: allows you to request data rectification, demanding these to be accurate and current, for example, if these are considered to be incomplete and/or outdated
- c. Right to Erasure or "Right to be Forgotten": allows you to request the erasure of data when it's deemed there are no valid reasons to store it and as long as there is no other valid reason that legitimises the processing (like the performance of a contract or compliance with a legal, statutory or judicial obligation)
- d. Right to Restriction: allows you to withhold or restrict processing certain data categories or purposes
- e. Right to Portability: through this right you can request to receive your data, in a digital and commonly used format, which allows the reuse of such data. Alternately, you may request the transfer of those data to another entity which shall henceforth become data controller.



f. Right to Object: allows you to object specific purposes, as long as there are no legitimate interests which override your own interests. One of the examples for this right is the objection to direct marketing purposes.

g. Right to Withdraw Consent: allows you to withdraw your consent but can only be exercised when your consent is the sole condition for legitimacy.

In this case, users may exercise any of these rights, in writing, by email or post to one of the following addresses:

- a. [rgpd@tecnopan.pt](mailto:rgpd@tecnopan.pt), owned by the data controller
- b. TECNO PAN, S.A. – Estrada Nacional n.º 10-1, lote 14, 2815-893 Sobreda

On the other hand, users are responsible for informing TECNO PAN regarding any changes to data previously provided, ensuring its accuracy.

Additionally, users may always submit complains whenever they feel necessary with the designated competent authorities. In Portugal, the competent authority is the Comissão Nacional de Protecção de Dados [National Committee for Data Protection], which contact details are as follows:

- a. Address: Rua de São Bento, n.º 148 - 3.º, 1200-821 Lisboa
- b. Telephone: (+351) 213976832
- c. Email: [geral@cnpd.pt](mailto:geral@cnpd.pt).

## 8 - PURPOSE OF PERSONAL DATA PROCESSING

Processing refers to an operation, or set of operations, performed over personal data or a set of personal data, by automatised and non-automatised means, such as collection, recording, organisation, structure, storage, adaptation or alteration, recovery, consultation, use, disclosure by transmission, dissemination or any other for of availability, alignment or combination, restriction, erasure or destruction.

Personal data collection and processing is intended to:

- a. Send commercial communications (catalogues, price tables, publicity, newsletters, bulletins and invitations) from TECNO PAN, including by electronic means. Through these communications, our users will be informed about different products, services, gifts, prize draws, promotions, competitions and other events promoted and offered by TECNO PAN
- b. Disclosure of information measures
- c. Inquiries, consults and statistical studies: personal data and, if applicable, opinions, suggestions, complaints, etc., may be used for:
  - 1. commercial and/or market studies
  - 2. increase or improvement of our products and services, customising our offers to the clients' preferences and/or needs, as well as the correction of non-compliances
  - 3. statistical processing of: Clients Complaints and Client Satisfaction Inquiries.
- d. Record users' registration on our website, reply to consults, requests, subscription in competitions, prize draws, promotions and other events promoted and organised by us, or any kind of request made by users through any means of contact available on TECNO PAN website.
- e. In case the user sends their Curriculum Vitae to TECNO PAN, their data will be processed for the management and procedure of their employment request. Data will be processed on the legal basis of consent by the submitting person. The consent can be withdrawn at any given moment, without affecting the lawfulness of previous processing. The submission of data is voluntary, however, if it's not submitted, it cannot be processed for the purposes specified. Data will be stored during the period necessary to reply your petition, request, consult, subscription and to regard it as definitely closed. Afterwards, data will be stored as communications history, except when the user requests its erasure, through the email [rgpd@tecnopan.pt](mailto:rgpd@tecnopan.pt). In any case, your data will be stored for a maximum period of one year, starting from the day of receipt. Notwithstanding this, if the User is hired, their data will be stored for the remaining of their employment, and for the period of time necessary to management and other purposes permitted by law, in order to comply with it.
- f. To manage and process any requests submitted to and by users, including: emails, letters, faxes and text messages to inform about products and services,

request status and values not settled in Current Accounts; carry out contacts for logistic problem solving and nonconformities; issue and processing of Payments, Receipts, Invoices and other documents for the compliance with accounting and fiscal obligations, in accordance with applicable law. In this case, data will be processed based on the commercial and legal relationship between the two parties, subsequent to the products and services provided. The submission of data for the above-mentioned purposes is mandatory, otherwise the requests cannot be managed and processed. Data will be held during the commercial and legal relationship period and, even after, until the period of limitation of possible liabilities which might arise from it, and for the compliance with purposes and obligations under current legislation.

If users provide or have provided data from third parties, they are responsible to inform them regarding everything that is established on the Privacy Policy, as well as to obtain their prior consent for such.

Similarly, TECNO PAN hereby informs that catalogues, price tables, promotions, campaigns, events or any kind of publicity information regarding their products and services might be published through their social media, whereby the users accept to be receivers of such information just by being our "friends" or "followers". If users don't want to receive this information on their social media profiles, they should stop following TECNO PAN.

## 9 - EXPRESS CONSENT AND ACCEPTANCE

The free, specific and informed provision of personal data by the respective data subject implies the acknowledgement and acceptance of the conditions established on the Privacy and Personal Data Protection Policy, taking into account that by using the channels or providing your personal data, TECNO PAN website users are expressively authorising their processing, in accordance with the rules defined on each applicable channel or instrument of collection.