

# PRIVACY POLICY | EUROSURFACES PORTUGAL S.A.

## 1. EUROSURFACES PORTUGAL, SA COMMITMENT

Eurosurfaces Portugal, SA, in the context of its activity, processes personal data, with the intent of ensuring with accuracy, effectiveness and safety, the protection of all data that the company collects and processes daily.

Please, read this Privacy Policy which describes how we process your personal data and how you can manage your rights as holder of personal data processed by Eurosurfaces Portugal, SA.

## 2. THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER

Within its field of competence and activity, Eurosurfaces Portugal, SA is the responsible entity for the collection and process of personal data, that are processed and stored in automated and non-automated form.

Eurosurfaces Portugal, SA has a data controller that could be contacted through the e-mail [privacy@rmc.pt](mailto:privacy@rmc.pt)

The controller is responsible for monitoring the activities involving processing of your personal data with the legal and regulatory requirements applicable and shall be the point of contact between Eurosurfaces Portugal, SA and the National Supervisory Authority, as well as between Eurosurfaces Portugal, SA and its clients and users concerning the processing of personal data.

## 3. PERSONAL DATA, PERSONAL DATA SUBJECTS AND CATEGORIES OF PERSONAL DATA

### What are personal data?

Personal data are any information, of any nature and on any medium, concerning an identified or identifiable individual. "Identifiable" refers to the set of information which may lead to the identification of an individual, in particular by reference to an identifier (for example, an identification number or a location data).

### From who do we collect personal data?

Considering Eurosurfaces Portugal, S.A. activity, the company processes, in its majority, data of individuals and companies, namely:

- Clients/partners and its employees;
- Service providers and its employees;
- Candidates and trainees;
- Potential clients;
- Suppliers;
- Visitors to the facilities.

### What is the personal data that we process and how do we collect it?

Eurosurfaces Portugal, SA only collects data that are adequate, relevant and limited to what is necessary concerning the purposes for which they are processed.

The collection of your data could be made orally or in written form (in particular through forms and contracts), as well as through the website. In general, we collect your data directly, and it may also be collected through public sources (for instances, websites and official public lists), as well as from incentives managing entities.

For carrying out the various purposes, we could collect the following types of personal data:

- Identification data (e.g. name, nationality or birth date);
- Contact data (e.g. cell phone, address or e-mail);
- Professional qualification or situation (e.g. level of education and CV);
- Financial, banking and transaction data (e.g. IBAN or tax number);
- Recording images of events or videoconferencing;
- Images collected through systems of videoconferencing.

As a rule, Eurosurfaces Portugal, SA does not collect special data, however driven by legal obligations, may collect health data or data concerning criminal offences or fines.

## 4. FOUNDATIONS AND PURPOSES FOR WHICH PERSONAL DATA ARE PROCESSED

### Why and on what basis do we use your personal data?

All data collected and processed by Eurosurfaces Portugal, SA are based on one of the following legitimate conditions:

- **Consent:** When the collection is preceded by your specific, informed and express consent in writing or through web. We collect your consent, for example, for recruitment and hiring purposes, for newsletters subscriptions or for the registration on actions promoted by Eurosurfaces Portugal, SA, quotation request, sample dispatch, marketing actions.
- **Contract or pre-contractual diligences:** when processing is necessary for the execution of a contract or for pre-contractual diligences.
- **Compliance with legal obligations:** when processing is necessary for compliance with a legal obligation. This includes, for example, data communication to other legal, tax or public bodies (national or community).
- **Public interest:** when processing is necessary to perform a task carried out in the public interest.
- **Legitimate interest:** when processing is necessary for pursuing legitimate interest by the entity responsible for the processing of data or by third parties, without affecting the freedom and rights of its clients and/or users.

### For what purposes do we collect your personal data?

Personal data collected by Eurosurfaces Portugal, SA are processed only for specified, explicit and legitimate purpose. When personal data are collected, it is intended exclusively to the purposes explicitly identified when collecting. The main purposes that support the collection of personal data by Eurosurfaces Portugal, SA are listed below:

- Internal and external disclosure of our products;
- Events management promoted by Eurosurfaces Portugal, SA;
- Contracting suppliers and service provisions;
- Disclose newsletters / publications;
- Physical security of people and facilities;
- Recruitment;
- Processing of salaries.

## 5. CONSERVATION PERIOD OF THE PERSONAL DATA

Personal data processed by Eurosurfaces Portugal, SA shall be stored by the company only for the necessary amount of time needed to pursue or fulfil their processing purpose, respecting maximum time limits required to meet contractual, legal and regulatory obligations.

As general rule, when there is a contract that legitimize the processing of your personal data, Eurosurfaces Portugal, SA shall keep that data if the contractual relation continues. There are other circumstances, like the compliance with legal or regulatory obligations (e.g., compliance with legal obligations, personal data regarding invoicing must be kept for a maximum of ten years from the date of the act), as well as the pending of a legal process, that can legitimize the conservation of your data for a longer period than expected. For recruitment purposes, Eurosurfaces Portugal, SA, shall keep curricula vitae and application forms for the period of 3 months.

At the end of the conservation period, Eurosurfaces Portugal, SA shall delete of the said data.

## 6. RIGHTS OF THE DATA SUBJECTS

Under current legislation, from the moment we collect and process your data, there is a set of rights that you may exercise, at any time, over Eurosurfaces Portugal, SA.

### What are your rights?

**Right of access:** a right that enables you to obtain information regarding the processing of your data and its characteristics (particularly the type of data, processing purposes, to whom the data might be disclosed, time limits for storing and which data you have to provide compulsory or optionally).

**Right of rectification:** a right that enables you to request the rectification of your data, requiring that the data is accurate and updated, for instances when you consider that it is incomplete or not updated.

**Right to eliminate data or “Right to be eliminated”:** this right enables you to request the elimination of your data from our databases, when you consider that there are not valid foundations to the conservation of your data, provided that there is not another valid foundation that legitimates such process (like the performance of a contract or the compliance with a legal or regulatory obligation).

**Right to restrict:** a right that enables you the suspension of the processing or the restriction of the processing to specific categories or purposes.

**Right of portability:** a right through which you could require the sending of your data in digital format and of general use, and in a way that will enable the reuse of such data. Alternatively, you may request the transmission of your data to another entity that will become responsible for the processing of your data.

**Right of opposition:** a right that enables you to oppose to certain purposes provided that there are no legitimate interests that do not take priority over your interests. One of the examples of this right is the opposition to purposes of direct commercialization (marketing).

**Right to withdraw consent:** a right that enables you to withdraw your consent, but it can only be exercised when your consent is the only condition of legitimacy.

### How can you exercise your rights?

All rights mentioned above may be exercised, with the restrictions set out in the applicable legislation, upon written request, to be sent through the e-mail [privacy@rmc.pt](mailto:privacy@rmc.pt)

Likewise, you may transfer issues related to the processing of your data, directly with data controller through the e-mail mentioned on point 2. You may also submit a complaint before the National Supervisory Authority.

## 7. TRANSMISSION OF DATA

### Who do we share your personal data with?

In view of the tasks of Eurosurfaces Portugal, SA, and depending on its purposes, your data may be shared with third parties, in which are included national or international public sector's entities and private entities for the purpose of complying with legal or regulatory obligations, contractual obligations or subject to the exercise of public authority.

Your data may also be accessed by Eurosurfaces Portugal, SA's service providers that are deemed necessary for the purposes mentioned above, particularly with regard to archive and information security services. Eurosurfaces Portugal, SA ensures that they use only service providers that provide execution guarantees of technical and organizational measures necessary and appropriate to protect your personal data.

### Transfers of personal data outside of the EEA

Exceptionally, Eurosurfaces Portugal, SA may transfer your personal data to third countries (outside the EEA – European Economic Area).

In those cases, Eurosurfaces Portugal, SA will assure that the transfers are made fully complying with the applicable legal rules.

## 8. COOKIES POLICY

### What are cookies

A Cookie is a small file with relevant information that is stored in your access device (computer, cell phone/smartphone or tablet) through the browser, when a website is visited by the user, to retain information about the user's visits.

Depending on how long the user stays on the page, cookies can be classified as session cookies or permanent cookies. The first type of cookie expires when the user closes the browser. The second one expires when its aim was completed or when they are manually switched off.

Cookies used by Eurosurfaces Portugal, SA on the website [eurosurfaces.eu](http://eurosurfaces.eu) or [rmc.pt](http://rmc.pt) do not collect personal information permitting the identification of the user.

Cookies used on the Eurosurfaces Portugal, SA website are:

- **Analytical** – they gather information about the user's navigation experience on the Webpage anonymously, although sometimes it also allows the identification of a user, unique and irrevocably, to obtain information about the user's interests about the services provided on the webpage.
- **From publicity** – active in a persistent way, but for a limited period, with the purpose of collecting information about navigation habits on the Internet, so that the publicity viewed by the user meets their needs and interests.

- **From third parties** – allows to the site remember navigation preferences, idioms, region and gather user's information to target publicity in line with your interests.

The *site* eurosurfaces.eu uses cookies to collect statistical information to analyze the operation of the site and the user's navigation experience, as well as evaluate the effectiveness of advertising and promotional campaigns.

#### **Disable the use of cookies**

Every browser allows the user to accept, refuse or delete cookies by selecting the appropriate option on your browser. Therefore, users can disable the use of cookies on the website eurosurfaces.eu, at any moment, modifying the definitions of the browser.

However, it is important to point out that disabling of Cookies may prevent some web services to work correctly, affecting the website's navigation, partly or completely.

#### **9. LEGISLATION**

The processing of users' personal details and clients performed by Eurosurfaces Portugal, SA, as well as sending commercial communications by electronic means are in compliance with national and Community legislation in force and in particular with the General Data Protection Regulation.

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