

## PRIVACY NOTICE

1 - Since privacy is very important to us, we have drafted this Privacy Notice, which must be supplemented with our [Privacy Policy](#).

2 - Both documents have been written in clear language, accessible and easy for everyone to understand.

3 - We want you, above all, to understand that your personal data is very important to us and that we will protect it within our organization through the adoption of accurate and thorough technical, organizational and procedural measures.

4 - We bear in mind the definition of "**personal data**" mentioned in the European Regulation regarding Data Protection, this is, information relating to an identified or identifiable individual ('holder of data'), thus considered to be an identifiable individual who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, electronic identifiers or to one or more specific physical, physiological, genetic, mental, economic, cultural or social factors concerning that individual.

All the information provided in the Privacy Notice is supplemented with our Privacy Policy, which we recommend reading.

### 1 - How do we collect your data

We collect your data by phone, online through our platform as well as in written form.

### 2 - What data do we collect?

- Name
- Email
- Address
- Citizen Card Number
- Fiscal Number
- Social Security Number

### 3 - What is the purpose of treating your data?

Among others, the following:

- customer/client identification;
- billing and collection of services rendered;
- changes to the provision of communication conditions of the contracted services;
- conducting satisfaction surveys;
- compliance with legal obligations to which we are subject to, and also,
- if there is customer consent to market services and/ or products, direct advertising and marketing, including by means of receiving messages regardless of the intervention of the recipients;
- optimization of visits and navigation to our website;
- management of the contractual agreement/ relationship;
- adequacy of services and/ or products to customer/ client needs and interests;
- information and marketing actions.

#### 4 - Personal data of children

Our services and products are not intended for children therefore we do not collect or have the intention of collecting their data.

Should this happen, and since it is not always possible to identify unambiguously those in the query, the subjects of parental responsibilities may contact us and request the deletion of any data which has been collected.

#### 5 - How long is your data kept for?

Data retention depends on the purpose. There are legal storing periods which must be complied with. If they do not apply, the data will be kept for the minimum period necessary which motivated the purpose for collection.

#### 6 - What are your rights?

You have the right to access, rectify, cancel and object to, as well as, transfer your data and limit its treatment. For more information about how to exercise these rights, see our Privacy Policy.

#### 7 - Which are the measures implemented to ensure the safety of personal data?

Our platform was built on the principle of "*privacy by design and privacy from its conception*", this is, we consider your privacy as a priority right from the very beginning. Technical and organizational measures have been implemented in accordance with this principle.

#### 8 - Is data communicated to third parties?

We may use a subcontractor to treat your data. We regulate this treatment, upon a signed contract and ensure that the subcontractor treats the data solely and only according to our instructions.

#### 9 - Are personal data transfers made?

We may have to communicate personal data to third parties, in which case, we comply with all legal provisions in force, and fulfil all the security issues with the transfer of data under a signed contract.

#### 10 - How are "cookies" used?

##### Types of cookies

What types of cookies are used and why?

The Cookies which are on the *Cartonagem Trindade* website and online services are part of the following categories:

Category 1 - essential cookies for the provision of services

These cookies are essential to enable the use of the Company websites and its features, as well as take advantage of its functionalities such as accessing secure areas and exclusive access to content, etc.

Category 2 - cookies for primary service analytics

These cookies collect information about how *Cartonagem Trindade* websites and services are used, for example, which pages are visited most. This information can be used to help improve the *Cartonagem Trindade* pages to become easier to use. These cookies also let you know if the visits to the *Cartonagem Trindade* websites come from campaigns which companies within the *Trindade Group* promote. These cookies do not collect information which identifies the user since all information collected is aggregated in

non-personal indicators and therefore anonymous and only intended to that mentioned above, this is only for internal purposes.

#### Category 3 - cookies for performance and functionality

These cookies enable the *Cartonagem Trindade* website to recognize the choices of the users upon using the services of the companies within the *Trindade Group*, for example:

**Performance Cookies** - collect information concerning the visits to and use of the site; for example, which web pages are most frequently visited and which error messages are sent. These cookies do not collect information which can identify a user. All information collected by these cookies are anonymous and used solely to improve the functioning of the site.

**Functionality Cookies** - allow a site to remember the user's choices (for example: language) and therefore offer more enhanced personal features. These cookies are not able to track the browsing activities on other sites. No user information is collected which may be used for advertising or to remind you which sites other than our website were visited.

The information these cookies collect does not identify the user personally or enable one to monitor his/her browsing activity on websites other than *Cartonagem Trindade*. They are only used to customize the website according to the preferences and characteristics of the user.

#### Category 4 – cookies for advertising and social media

**Advertising and Social Media Cookies** are used to (1) display more relevant advertising to users according to their interests; (2) limit the number of times the user sees an advertisement; (3) help to assess the effectiveness of an advertising campaign; and (4) understand the behaviour of the user after having seen certain ads. Cookies are usually posted at the request of advertising networks with the permission of the website operator. They recall the user having visited a website thus it will often be linked to the site functionality provided by another organization. This may affect the content and the messages which one sees on other websites. If the user does not allow the use of these cookies, it is possible the user will not be able to use or see tools for sharing and reproducing certain videos on our site.

*Cartonagem Trindade* does not resort to the use of Targeting Cookies to promote advertising aimed at our users.

*Cartonagem Trindade* only uses Category 2 and 3 cookies, seeing that all other categories are deactivated on our page. For more detailed information, consult our Data Privacy Policy.

Whenever more detailed information is required concerning the cookies used on our website, we appreciate you contacting us via e-mail.

#### 11 - Who can contact in case of queries?

1 - If you have any questions or concerns about how we collect and treat personal data, please contact our Data Protection Officer.

<b>Contacts of the Data Protection Officer</b>
Name: João Paulo Rodrigues da Silva
Email: <a href="mailto:dpo@cartonagemtrindade.com">dpo@cartonagemtrindade.com</a>
Address: Rua do Jornal "O Regional" 320, 3700-024 São João da Madeira

## 12 - Consent

Upon consenting to this Privacy Notice, you are giving us permission to treat your personal data for the specific purposes mentioned above.

The consent you give us for the mentioned purposes is free, explicit, informed and specific.

You may at any time withdraw your consent by sending the "[consent withdrawal form of the data subject – MOD.EST.18](#)" via email or post to the contact mentioned above.