

 <p>TRINDADE CARTONAGEM</p>	<p>POLÍTICA DE PRIVACIDADE DA CARTONAGEM TRINDADE</p>	<p>PP/EST.01 Versão nº1 Data: 17-05-2019</p>
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PRIVACY POLICY CARTONAGEM TRINDADE

I – GENERAL PRINCIPLES

- a) Authorized personnel can use authorized data for authorized purposes;
- b) Your privacy is very important to us in everything we do;
- c) We understand that only authorized personnel can access data and treat it according to previously defined purposes;

and

- d) We consider that, as the data subject, the data is yours and not ours.

This Privacy Policy expresses our commitment and compliance with the legal norms/standards designed to protect your privacy and your personal data;

- e) Access to our website and the availability of your personal data implies the acknowledgement and acceptance of this Privacy Policy;
- f) Any provision of links to external websites other than to our company does not imply any assumption of liability for such websites and their content and are therefore not applicable to this Privacy Policy.

II - CONCEPTS AND INFORMATION FOR THE SUBJECT DATA

1 - What are personal data?

For the purposes of this Policy, we bear in mind the definition adopted by the Data Protection General Regulation (GDPR), which says that 'Personal Data' means any information relating to an identified or identifiable person ('data subject'). An identifiable person is one who can be identified, directly or indirectly, in particular, by reference to an identifier such as an

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identification number, or to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that person.

2 - How do we collect your data?

a) Within the scope of our activity, we collect and process personal data by phone, our website or in writing, for example, according to a contractual or pre-contractual agreement. The data we collect are strictly necessary for the provision of our services and/ or the supplying of our products/ services.

b) We collect and treat your personal data upon your consent especially when it is of free-will, this is, specific, informed and explicit.

You may, at any time, withdraw this consent, a decision made solely by you, by sending an email to dpo@cartonagemtrindade.com. A Data Subject Withdrawal Consent Form is then sent to you to be returned.

3 - What personal data do we collect?

a) For the purposes of providing and selling our services and/or products, the following data is collected:

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

b) The personal data we collect are computer processed and stored in databases, strictly complying with the legislation regarding not only data protection and norms but also information security.

c) Your data is only treated according to the purpose, or specific and legitimate purposes, defined at the time of collection of personal data.

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4 - What is the purpose of treating your personal data?

We use your personal data for the following purposes:

- a) customer/ client identification;
- b) billing and collection of services rendered;
- c) changes to the provision of communication conditions of the contracted services;
- d) conducting satisfaction surveys;
- e) compliance with legal obligations to which we are subject, and also
- f) 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;
- g) optimization of visits and navigation to/on our website;
- h) management of the contractual agreement/ relationship;
- i) adequacy of services and/ or products to the customer/ client needs and interests;
- j) information and marketing actions.

5 - Personal data of children

- a) Should data be collected regarding children, we consider they merit special protection since they are less aware of their rights related to the processing of data.
- b) Considering that children must be accompanied in every aspect of their lives, including digital, it is the parents' responsibility to request the deletion of any data, which will be promptly executed once the occurrence of such incident is verified.

6 - How long is your personal data kept for?

- a) the period that data is stored and maintained varies according to the purpose for which the information is treated. There are legal requisites which require us to retain data for a minimum time.
- b) If there is no legal period to retain data, it will be stored and kept for only the minimum period necessary for the purposes for which it was collected and later treated, after which it will have the proper treatment.

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7 - What are your data protection rights as a data subject?

1 - Under the provisions of GDPR, we guarantee the exercise of your rights with regards to:

- a) **Access** - the right to request, among others, information on whether your data is being treated or not, which data is treated and for what purposes.
- b) **Rectification** - the right to, without undue delay, correct any information you believe is inaccurate and to complete information you believe is incomplete.
- c) **Erasure** - also called the right to be forgotten – you have the right to request that, in certain conditions, your personal data is erased from our records, without undue delay.
- d) **Object to Processing** – the right to object to certain types of your personal data processing, such as the treatment for the purpose of direct marketing.
- e) **Portability** – the right to request the transfer of your collected personal data to another organization or to receive data in a structured format and of common use.
- f) **Restrict Processing** – the right to request, whenever intended, for example, contest the accuracy of your personal data for a period of time to enable the verification of its accuracy.

2 If you would like to exercise any of these rights, please fill out the form for the **Exercise the Rights under the terms GDPR: [MOD.EST.20](#)**


8 - What measures are implemented to ensure the safety of personal data?

We have adopted technical and organizational measures, which we review and improve periodically to ensure the safety and protection of your personal data in terms of your availability, authenticity, integrity and confidentiality, as well as to prevent loss, misuse, alteration, treatment and/ or unauthorized access or any other form of unlawful treatment.

9 - Are data communicated to third parties?

1 - In the scope of our activity, we may use a subcontractor to treat your data, which implies access to such data by these entities.

2 - When this happens, appropriate measures are contractually provided to ensure that third parties, contractors, partners, or a group relationship, present acceptable guarantees of

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implementing technical and organizational measures which will act only in accordance to our instructions.

10 - Are personal data transfers made?

1 - We may have to communicate your personal data to third parties.

2 - We seek, in this case, that your data be treated in strict compliance with the applicable laws.

3 - In particular, security issues at the level of data transmission are taken into account, third parties are contractually bound and respect the confidentiality of data received, thus not using the data in any way, for purposes other than those which motivated the data transfer either for personal benefit or for that of a third party.

11 - How are "cookies" used?

Cartonagem Trindade uses cookies for the following purposes:

- **Analytical purposes**
 - Google Analytics
 - <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>
 - Cookies: `_gat`, `_ga`, `_gid`

- **Functionality**
 - Saves the user-selected language for website display
 - Cookies: `lang`, `trinity`

Name	Provider	Purpose	Validity	Type
<code>_gat</code>	cartonagemtrindade.com	Analytical purposes	1 year	HTTP Cookie
<code>_ga</code>	cartonagemtrindade.com	Analytical purposes	1 year	HTTP Cookie

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_gid	cartonagemtrindade.com	Analytical purposes	1 year	HTTP Cookie
Lang	cartonagemtrindade.com	Functionality	Session	HTTP Cookie
Trinity	cartonagemtrindade.com	Functionality	session	HTTP Cookie

12 - Who can I contact in case of any queries?

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

<p>Contact of the Data Protection Officer or other person responsible for data protection (mention who)</p>
Name: João Paulo Rodrigues da Silva
Email: dpo@cartonagemtrindade.com
Address: Rua do Jornal "O Regional" nr 320, 3700-024 São João da Madeira

2 - The Data Protection Officer/ Person responsible for Data Protection is accountable for ensuring that any revision or update to this Policy is conducted in accordance with the GDPR requirements.

12 - Policy Review

We reserve our right to change the content of this Privacy Policy, without notice and inform our clients/ customers via our website.