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## **Privacy Policy – Juridical information concerning data protection**

At MARSILINOX – Indústria Metalúrgica, Lda., we understand that the use and processing of your personal data requires your trust. We're subject to the highest privacy standards and we'll only use your personal data for clearly identified purposes and according to your data protection rights. Confidentiality and integrity of your personal data are among our main concerns.

This Privacy Policy establishes the way MARSILINOX uses the personal data of its customers and potential customers, suppliers and potential suppliers, job applicants and employees, complying with the personal data protection law in force, namely the General Data Protection Regulation – Regulation (EU) 2016/679 of The European Parliament and of the Council, of 27 April 2016.

This Privacy Policy is exclusively applied to the collection and processing of personal data for which MARSILINOX is an accountable collector, within the scope of the services and/or products supplied to its Customers and purchased to its Suppliers, as well as in the constitution of working relations with its employees and in all other situations where a processing of personal data by MARSILINOX might occur.

While providing its services/selling its products, as well as in the acquisition of services/purchasing of products and within the scope of the working relations established with its employees, MARSILINOX might be sporadically requested, by legal obligations, to disclose data or serve as intermediary on the delivery of those data to official entities, whereby, in any case, can MARSILINOX be held accountable for the collection and further processing of those data by the respective entities.

There might be included, at MARSILINOX website, hyperlinks which grant access to other websites unrelated to MARSILINOX. These hyperlinks are made available in good faith, whereby, in any case, can MARSILINOX be held accountable for the collection and further processing of personal data made through those websites; MARSILINOX also states clearly that it won't assume any responsibility regarding those websites.

### ***Concept of personal data***

Under the terms of Article 4, 1) of the GDPR, are considered “personal data” any information relating to an identified or identifiable natural person.

GDPR is only applicable to natural persons data, not comprehending either legal persons data or deceased persons data, with the exception of sensitive data.

Personal data is understood as all the information related to the identification of its subject or which may lead to its direct or indirect identification, as for example a name, an identification number, location data, electronical identifiers or one or more specific elements regarding one’s physical, physiological, genetical, mental, economical, cultural, religious or social identity.

Examples of personal data:

- Name
- Identification number
  - Identity card, taxpayer number, driving licence, passport
- Identification and location addresses
  - Physical (as, for instance, an address)
  - Electronic: e-mail address, webpage, Facebook page, etc...
- Biometric
  - Height, weight, diverse physical characteristics
  - Genetics
- Health
  - Syndromes, diseases
  - Physical or mental performance
  - Diagnosis data, as blood pressure or ECG
- Economical
- Cultural
- Religious
- Social
- Political

### ***Who's responsible for processing your personal data***

It's MARSILINOX administrative and personnel services responsibility to process the personal data of customers and/or potential customers, suppliers and/or potential suppliers, job applicants and employees which provide their data to our organization.

The contacts are as follows:

Name: Alexandre Gomes

Email: [marsilinox@marsilinox.pt](mailto:marsilinox@marsilinox.pt)

Telephone: +351 256 410 600

Name: Maria João Costa

Email: [mariajoao@marsilinox.pt](mailto:mariajoao@marsilinox.pt)

Telephone: +351 256 410 600

Name: Daniel Brandão

Email: [Daniel.Brandao@marsilinox.pt](mailto:Daniel.Brandao@marsilinox.pt)

Telephone: +351 256 410 600

Name: Fábio Espadaneira

Email: [fabioespadaneira@marsilinox.pt](mailto:fabioespadaneira@marsilinox.pt)

Telephone: +351 256 410 600

### ***How do we collect your personal data***

Your personal data will be collected and processed in the following situations:

- Employees:
  - When MARSILINOX defines it will hire a new employee, we proceed with the collection of his personal and household data, for the purpose of compliance with legal obligations, Fiscal Authority, Social Security, Authority for Working Conditions, insurance companies and certified accountant requirements and execution of internal management procedures, through copy and scanning of identification documents and

biometric data registry. In the exact moment we collect those data, we also ask the personal data's subject for its consent, which is registered in a specific document;

- Customers:
  - If, as a Customer (company or individual), one proceeds to the acquisition of a given product or when MARSILINOX provides it a given service, and for the purpose of proceeding with the respective sale or service provision, we'll process its personal data. This processing might comprehend eventual personal data from customers' employees;
- Suppliers:
  - If, as a Supplier (company or individual), one supplies a given product or provision a given service to MARSILINOX, and for the purpose of proceeding with the respective purchase and ulterior accounting treatment, we'll process its personal data. This processing might comprehend eventual personal data from customers' employees;
- Job applicants:
  - If you intend to offer your services to MARSILINOX, we'll ask for some identification data on our F/12 – Application Form. At that moment, we'll also ask the personal data's subject for its consent;
- Image capture:
  - At our facilities, we have a video surveillance system, with fixed and mobile cameras and image recording, for the purposes of controlling personnel entrance, intrusion detection and non-authorized access to our production and storage facilities;

The personal data we collect can be computationally processed, either by automated or non-automated means, ensuring, in any case, the strict observance of the data protection legislation, being stored in specific data bases, created for this purpose, and in any situation will these data be used for any purpose other than the one they were collected or the personal data subject has given its consent for.

In what concerns to image capture, we observe the following rules:

- Sound capture is not allowed;

- All personnel with authorized access to recordings, within the scope of their functions, is obliged to keep secrecy about them, under penalty of law;
- It's strictly forbidden to make copies of these recordings, with the exception of requests made within the scope of duly identified criminal investigations;
- Image/video capture is confined to the areas effectively used by MARSILINOX, therefore not including thoroughfare or neighbouring properties;
- Cameras don't focus regularly on employees during their working activity, nor the respective images are used to control that activity, be it for productivity measurement or disciplinary effects;
- The collection of images in the access or inside sanitary facilities, bathhouses, changing rooms or rest areas for the workers, as well as in the kitchen area, is strictly forbidden;
- Any individual included on a given recording has the right to access the respective images, unless they are being used within the scope of a criminal investigation;
- There are informative signs, placed on the company's facilities, alerting for the existence of video surveillance, with the following description: "For your own safety, this place is under video surveillance".

***For what purposes can your personal data be used and in what basis lies its usage***

Your personal data will be collected and used for the following purposes:

- Employees:
  - Compliance with monthly obligations from the Fiscal Authority and the Social Security;
  - Compliance with yearly obligations from the Authority for Working Conditions;
  - Compliance with monthly obligations from the insurance companies;
  - Assiduity and/or access record and management;
- Customers:
  - In a general manner, the collected personal data are based on the need of and are intended to be used for the purposes of contractual relationship management, sale and provision of contracted services;
- Suppliers:
  - In a general manner, the collected personal data are based on the need of and are intended to be used for the purposes of contractual relationship management, purchase and acquisition of contracted services;

- Job applicants:
  - In a general manner, the collected personal data are based on the need of and are intended to be used for the purpose of obtaining relevant information about the applicant, for an eventual future hiring process with MARSILINOX;
  
- Image capture:
  - For the purposes of controlling personnel entrance, intrusion detection and non-authorized access to our production and storage facilities;
  - For the purpose of duly identified criminal investigations;

in the strict terms selected by you in the consent you sign, at the moment your data is collected.

Under the data protection law currently in force in the European Union (the General Data Protection Regulation), the use of personal data has to be justifiable under at least one legal basis for personal data processing, being them as follows:

- When processing is necessary to perform a contract with you or proceed to its execution;
- When processing is necessary for compliance with legal obligations to which MARSILINOX is subject to;
- When processing is necessary to declare, exercise or defend a right in a judicial dispute against you, us or a third party.

### ***What data can be collected***

The following categories of personal data are collected by MARSILINOX:

- Employees:
  - Contact information: Name; address; e-mail address; phone number;
  - Personal information: Birthdate; marital status; household (number of dependants and spouse's profession); taxpayer number; identity card number; social security number; biometric data (digital print);
  - Medical exams' reports required by occupational medicine.
  
- Customers/Suppliers:

- Information regarding the identity card of the company's managing partner (or from another co-worker);
- Contact information: Name; address; e-mail address; phone number;
- Job applicants:
  - Contact information: Name; address; e-mail address; phone number;
  - Personal information: Birthdate; marital status; Curriculum Vitae;
- Image capture:
  - Soundless recordings of all personal who attend/visit MARSILINOX's facilities;

### ***How do we keep your personal data safe***

We have security measures, including authentication tools on our server, to help protecting and keeping the security, integrity and availability of your personal data.

We observe diverse procedures, in accordance with the data we collect:

- Employees:
  - Data copies in paper format: Are stored by the personnel department, being that the access to those data is restricted to authorized personnel and only for the intended and defined purposes;
  - Computer readable elements: Although computerized data storage on the server may not guarantee total security against external intrusion, we carry out our best efforts to implement and preserve physic, electronic and procedural security measures, destined to protect your personal data in accordance with the applicable data protection requirements. Among others, we've implemented the following measures:
    - Restricted personnel access to your personal data, based on the "need-to-know" criterion and only within the scope of the consented purposes;
    - Protection of the information technology systems through firewalls, with the purpose of blocking unauthorized access to your personal data;
    - Permanent monitoring of accesses to our information technology systems, with the purposes of preventing, detecting and blocking the improper use of your personal data.
- Customers/Suppliers:

- Data copies in paper format: Are stored by the personnel department, being that the access to those data is restricted to authorized personnel and only for the intended and defined purposes;
- Computer readable elements: Although computerized data storage on the server may not guarantee total security against external intrusion, we carry out our best efforts to implement and preserve physic, electronic and procedural security measures, destined to protect your personal data in accordance with the applicable data protection requirements. Among others, we've implemented the following measures:
  - Restricted personnel access to your personal data, based on the “need-to-know” criterion and only within the scope of the consented purposes;
  - Protection of the information technology systems through firewalls, with the purpose of blocking unauthorized access to your personal data;
  - Permanent monitoring of the accesses to our information technology systems, with the purposes of preventing, detecting and blocking the improper use of your personal data.
- Job applicants:
  - Data copies in paper format: Are stored by the personnel department, being that the access to those data is restricted to authorized personnel and only for the intended and defined purposes.
- Image capture:
  - Access to recordings is restricted to the company's authorized personnel and its use is only for security and intrusion control purposes.

### ***For how long we keep your personal data***

We only preserve your data for the necessary period of time, within the scope of the purpose those data were collected for.

Once the maximum retention period is reached, your personal data will be safely erased.

For the purposes defined in this Privacy Policy (employees data), your personal data will be kept during the following period:



- Contact and personal information: For as long as the employee is working in the company and up until 12 months after his exit;
- Medical exams reports: For 40 years after the employee's exposition has ended. Law 3/2014, of the 28<sup>th</sup> of January;
- Customers/suppliers data: For as long as a commercial relationship exists between MARSILINOX and the entity;
- Job applicants data: For 3 years
- Video surveillance images: For 30 days after being recorded: At the end of this deadline, they will be destroyed.

### ***To whom we provide your data***

Only for the purpose of compliance with legal obligations, and in specific cases already identified before, do we grant access and authorize data processing to the following entities, in accordance with the tasks conferred upon them:

- Fiscal Authority;
- Social Security;
- Insurance companies;
- Certified accountant;

A declaration of commitment with the observance of GDPR will be demanded to all these entities (with the exception of the public ones).

### ***How can you change or withdraw your consent***

You can, at any given moment, change or withdraw your consent, with future effects.

After completely withdrawing your declarations of consent, you will no longer be contacted and receive communications for the purposes defined in this Privacy Policy.

If you want to withdraw the declarations of consent submitted to MARSILINOX, you'll only need to contact our administrative services and ask for the correction of your data consent form.

### ***Get in touch with us, know your data protection rights and the right to lodge a complaint with a supervisory authority***

If you happen to have any question regarding how we've been using your personal data, you should, in the first place, contact our administrative services, which are responsible for data protection.

You have the right of asking us to:

- provide you additional information about the usage we make of your personal data;
- give you a copy of the personal data you have provided us;
- forward the personal data you provided us to another controller, upon your request;
- update any imprecision on the personal data we keep;
- erase the personal data which usage is no longer legitimate;
- restrict the way we use your personal data, until the filed complaint is duly investigated;

In case you exercise any of these rights, we will proceed with its analysis and we'll answer you within a month.

In case you're not satisfied with the way we use your personal data or with our answer, following the exercise of one of the rights listed above, you have the right to lodge a complaint with your supervisory authority (which, in Portugal, is the following one):

Comissão Nacional de Proteção de Dados – CNPD  
Rua de São Bento, n.º 148, 3º, 1200-821 Lisboa  
Tel.: 213928400  
Fax: 213976832  
e-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)