



PRIVACY POLICY

SETRONIX – SOCIEDADE DE ESTUDOS E EMPREENDIMENTOS DE TELECOMUNICAÇÕES, S.A.

1. INTRODUCTION

This privacy policy gives detailed information on how **SETRONIX – SOCIEDADE DE ESTUDOS E EMPREENDIMENTOS DE TELECOMUNICAÇÕES, S.A.** uses and protects your personal data, as well as your rights.

This privacy policy applies to personal data processing, either given by you or obtained by **SETRONIX** about you, when:

- there is communication between **SETRONIX** and its clients, subcontractors, suppliers, financial institutions, banks, public entities, among others;
- you contact us by e-mail, letter or fax to request our products or services, ask for information about **SETRONIX** or apply for a job;
- you visit our website, whether to request our products or services, ask for information about **SETRONIX**, to contact us, send an application or use any other service available on the webpage.

SETRONIX respects your right to privacy and meets the requirements of the new General Data Protection Regulation (GDPR) (EU) 2016/679 on individual data protection, what concerns processing and sharing personal data (which replaced the Directive 95/46/CE), as well as complies with current legislation in terms of personal data.

So you should review our privacy policy to make sure you understand how your personal data are used while you surf on our website and communicate with **SETRONIX**.

2. WHAT IS PERSONAL DATA

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

3. WHAT IS DATA PROCESSING

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4. DATA PROTECTION CONTROLLER

The data protection controller is **SETRONIX** – Sociedade de Estudos e Empreendimentos de Telecomunicações, S.A., with headoffice in Rua Manuel Maria Brardo n.º 39 1.º esquerdo, 2125-188 Marinhas, PORTUGAL, which determines the purposes and means of the processing of personal data.

In case you need to get in touch with the person responsible for data protection you can send an e-mail to: dados@setronix.pt .

5. PERSONAL DATA WHICH ARE PROCESSED BY SETRONIX

For the purposes defined in this privacy policy, **SETRONIX** collects and processes the following personal data:

- a) Identification data: name, surname, identification document (tax identification number or code, bank account number, proof of bank account ownership and proof of residence).
- b) Contact details: address, proof of address, e-mail address, telephone number, mobile number.
- c) Transactional data: information about purchases, orders, contracts, invoicing and collection, payment methods, bank details and any other related to the transactions with **SETRONIX**.
- d) Electronic data: IP address, device type and ID, browser type and language, domain name through which the website is visited, navigation information, activity on Website.



6. PERSONAL DATA COLLECTION, PURPOSES AND LAWFUL BASIS FOR PROCESSING

SETRONIX collects and processes personal data which you voluntarily provided while interacting with the company:

- by letter, fax and/or e-mail;
- through our website, especially by requesting information or price quotations on our products or services.

SETRONIX collects and processes personal data with the following purposes:

- Clients and potential clients management

Data processing is necessary for the performance of your contract with **SETRONIX**, or to take steps at your request prior to entering into a contract. We cannot offer you the services you requested or hired unless you provide us your data. They will be kept only for necessary time to achieve the purpose they were processed for.

Clients' personal data can be processed by **SETRONIX** for the purpose of litigation management. The lawful basis is the existence of a legitimate interest of **SETRONIX** and data will be kept for the necessary time to make use of the respective rights.

- Marketing

SETRONIX may process your data to send you information about its products and services. The processing of your data will be carried out only with your consent, which you may give at that time or in a form. If you give your consent, you will get marketing communications through e-mail.

STRONIX won't be able to send you commercial communications unless you provide your personal data (name and e-mail). You have the right at any time to object to the processing of your data. Your data will be kept for this purpose for 1 year after the last approach (in case of regular contacts) or 2 years (in case of sporadic contacts).



- Managing Subcontractors and Suppliers

Processing your data is important for the performance of the contract with the **SETRONIX**, or to take steps at your request prior to entering into a contract. Unless you give us your data, we won't be able to meet the undertaken contractual obligations. Your data will be kept for this purpose for 10 years.

Supplier personal data can be processed by **SETRONIX** for the purpose of litigation management. The lawful basis is the existence of a legitimate interest of **SETRONIX** and data will be kept for the necessary time to make use of the respective rights.

SETRONIX supplier data, especially collaborators data may be transferred to SETRONIX clients so as to meet legal or contractual obligations.

- HR Recruitment and Selection Process Management

Data processing is necessary within the process of recruitment and selection as well as for the performance of your contract with **SETRONIX**. Unless you provide us your data, we won't be able to carry out the selection and recruitment or meet the contractual obligations. Your data will be kept for this purpose for 10 years.

Applicant's personal data may be processed by **SETRONIX** for the purpose of litigation management. The lawful basis is the existence of a legitimate interest of **SETRONIX** and data will be kept for the necessary time to make use of the respective rights.

- Managing complaints and contacts received by **SETRONIX**

You can send to dados@setronix.pt suggestions or complaints related to the services provided by **SETRONIX**. Your data will be processed based on your consent and the legitimate interest of **SETRONIX**. **SETRONIX** will collect your data to analyse and solve the situation which underlies your suggestion or complaint.

Your data will be kept for the time necessary for solving the matter, for a maximum period of 10 years.

7. DO WE SHARE YOUR PERSONAL DATA?

The sharing, use and transfer of your personal data to third parties will be carried out within the terms of this privacy policy.



SETRONIX does not sell or rent its data to third parties; it only communicates personal data to people or entities it professionally hires, fully complying with legislation, as long as your consent for the specific transfer has been given.

SETRONIX may share the access to your personal data with third parties when that is necessary to perform one of the defined purposes, but always in full compliance with the law:

- a- **clients:** within the commercial and contractual relationship;
- b- **subcontractors and suppliers:** within the commercial and contractual relationship;
- c- **banking and financial institutions:** within the commercial and contractual relationship;
- d- **fulfilment of legal obligations:** **SETRONIX** may transfer your personal data when it's necessary to the fulfilment of any legal obligation, including communication to competent authorities, whether administrative or tax authorities, judicial or other, for meeting the requests of the police or judicial authorities regarding the prevention and control of money laundering and financing of terrorism;
- e- **international data transfer:** your personal data may be transferred to clients or data processing institutions in and outside the EEA. In some cases, laws outside the EEA don't provide the same level of protection to your data as laws within the EEA. However, if your personal data are transferred outside the EEA, such transfers shall be made on the basis of adequacy decisions or standard contractual provisions adopted by the European commission.

8. MEASURES TO KEEP YOUR PERSONAL DATA SAFE

SETRONIX has approved and implemented strict rules to ensure the protection and security of your personal data and it is committed to make sure they are fulfilled.

SETRONIX has therefore adopted several technical and organisational measures to protect your personal data from loss, diffusion, undue use, processing, alteration and unauthorized access or any other form of illegal processing.

Likewise, any company or third party to whom **SETRONIX** may have transferred your personal data within their commercial/business relation must carry out the technical, organizational and security measures that fulfill the legal requirements and the rights of the data owner.

9. HOW LONG DO WE KEEP YOUR DATA?

The storage and retention period of your data depends on the purpose to which the information was processed.

Thus, your personal data shall be stored for the time necessary to achieve the purpose they were collected for, plus limitation or prescription periods of the associated rights, until you make use of your right to erasure or to withdraw your consent.

The data shall then be erased, unless a longer retention period is required or permitted by law (for example, for the establishment, exercise or defence of legal claims), in which case they would be retained for the necessary time before being erased.

10. WHAT ARE YOUR RIGHTS IN RELATION TO THE PROCESSING OF YOUR PERSONAL DATA

You have the following rights regarding collection and processing of your personal data:

- The right to be informed: you have the right to be informed in a clear, simple and concise language about use and processing of your personal data.
- The right of access: you have the right to request at any moment the access to your personal data and to information about their processing. You have the right to obtain a copy of the same data which will be free of charge (though the request of additional copies may be subject to an administrative fee/tax). To get access to your personal data, to the information about their processing and the copy of your personal data, **SETRONIX** may ask for a proof of identity or request more information from you, without which the access or the copy won't be authorized.
- The right to rectification: You can challenge the accuracy of personal data held about you by an organisation, and ask for them to be corrected or deleted. If your data are incomplete, you can ask for the organisation to complete them by adding more details.
- The right to erasure: you have the right to request the erasure of your personal data when they are no longer necessary to the purposes for which they were collected or processed. However, **SETRONIX** may keep them, as long as they are duly blocked in cases foreseen by applicable regulations;
- The right to restrict processing: you have the right to request the restriction or suppression of your personal data, meaning we can keep them but not use them, except in the course of legal proceedings;
- The right to data portability: you have the right to get your data transferred to another organization in a way that is accessible and machine-readable. This right applies when the processing of your



personal data was based on your consent or in the fulfilling of a contract and the processing was done automatically;

- The right to object: you have the right to object to the processing of your personal data including the creation of profiles. We won't process your data unless we can show that we have a compelling reason for processing them or to establish, exercise or defend legal claims;

- The right to withdraw consent: in those cases you gave us consent to process data regarding certain activities (such as, sending marketing information), you can withdraw it at any time, without this compromising the legitimacy of the processing done under that consent;

- The right to address a complaint to a supervision's authority: You have the right to place any request, complaint or claim directly at **SETRONIX** – Sociedade de Estudos e Empreendimentos de Telecomunicações, S.A. through the contacts given in paragraph 4, or directly at CNPD/Portuguese Data Protection Authority (<https://www.cnpd.pt>);

11. USE OF COOKIES AND SIMILAR TECHNOLOGY

SETRONIX does not use cookies or similar technology to collect personal information on its **website**.

12. CHANGES

SETRONIX may alter this privacy policy to adapt it to changes if requested by law. Those changes must be published in **SETRONIX**'s website or communication channels. We recommend that you re-read this privacy statement periodically to ensure that you continue to be fully informed about your data protection.

Last update: 25th May 2018