

Since May 25, 2018, the General Data Protection Regulation (Regulation No. 2016/679 of the European Parliament and of the Council, of April 27, 2016) is applicable to all entities that process personal data, whereas:

- a) establishes the rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data;
- b) protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.

Fajota, S.A., in the quality of Personal Data Controller or Processor, under the GDPR, reports the following:

**a) Personal data Controller or Processor and contact information:**

Fajota, S.A.  
Zona Industrial de Assequins  
3750-325 Águeda  
Telephone: 234 612 700  
Email: [qualidade@fajota.pt](mailto:qualidade@fajota.pt)

**b) Purpose of Personal data processing**

The processing of personal data allows, among other purposes:

- The development and direct marketing of products / services that are most appropriate to the profile and needs of each Client;
- Response to contact requests;
- Commercial management;
- Maintenance of internal record-keeping;
- Sending of promotional and informative newsletters. Customers can, at any time, cancel their subscription to the newsletters via email, by clicking on the unsubscribe link at the end of the newsletters;
- Preparation of service provision contracts with suppliers;
- Drafting employment contracts.

**c) Lawfulness of processing personal data**

**Reasons for Personal data Processing – article 6<sup>o</sup> and considerations 40, 41 to 49 of the GDPR:**

Fajota, S.A. only processes personal data based on the following circumstances:

- With the consent of natural persons;
- When there is a contractual obligation between Fajota, S.A. and a data subject;
- To comply with a legal obligation (provided for in EU law or national law).

All data processing operations comply with fundamental legal bases within the scope of data protection and privacy, namely as regards their circulation, lawfulness, fairness, transparency, purpose, minimization, conservation, accuracy, integrity and confidentiality, with Fajota, SA available to demonstrate its responsibility towards the data subject.

All operations involving the processing of personal data relating to the provision of services by Fajota, S.A. are a necessary requirement for compliance with them, and the failure to provide personal data by the holders makes the provision of these services unfeasible, with the possibility of their termination.

#### **d) Categories of personal data to be collected**

The categories of personal data to be collected are as follows:

- Identification info;
- Contact details;
- Billing Data;
- Family life data;
- Data on professional life;
- Financial information;
- Traffic and location data;
- Internet browsing data;
- Other categories of non-sensitive personal data.

#### **e) Period of storage of personal data**

The period of storage of the data collected in the scope of the contracts entered into by Fajota, SA stems from what is stipulated in the general or specific legislation, applied to each type of document generated or processing carried out and, as a general principle, personal data will only be preserved for the strictly necessary period, that is, during the duration of the contract, or until the end of the purpose for which the data processing was carried out.

With regard to documents of a fiscal or administrative nature, the conservation period is carried out for a period of 10 years.

#### **f) Recipients of personal data**

Fajota, S.A. may send personal data in the context of mandatory communications imposed by law to public authorities. However, public authorities which may receive personal data of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; (see Art. 4, nº 9 of the GDPR).

Fajota, S.A. may also send personal data to financial institutions, service providers in accounting, health and safety and training, within the scope of compliance with the legal obligations to which the parties involved in the services provided are subject.

Fajota, S.A. only sends data to third parties who attest to the adoption and compliance with the GDPR.

#### **g) Rights of data subjects**

Without prejudice to the applicable legislation or the contracts under which personal data were provided, data subjects have the right to: - article 15 to 22 of the GDPR

- **Obtain information** about the processing of their personal data;
- request **access** to the preserved personal data concerning them;
- Request the **correction** of incorrect, inaccurate or incomplete personal data;
- request the **erasure** of personal data that is no longer needed;
- **Refuse processing** of their personal data for reasons that relate to their specific situation;
- **Restrict processing** of their personal data in specific cases;
- Receive their personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (**data portability**).

Personal data holders have also the right to:

- Withdraw consent at any time, without compromising the lawfulness of the processing carried out based on the consent previously given - article 7, paragraph 3 of the GDPR;
- Lodge a complaint to a supervisory authority - article 77 of the GDPR.

#### **h) Security measures adopted by Fajota, S.A.**

Fajota, SA is committed to ensuring the confidentiality, protection and security of personal data of data subjects, through the implementation of the appropriate technical and organizational measures to protect them against any form of improper or illegitimate processing and against any accidental loss or destruction of data.

For this purpose, Fajota, SA has systems designed to guarantee the security of the processed personal data, creating and updating procedures that prevent unauthorized access, accidental loss and/or destruction of personal data, committing itself to respect the legislation regarding the protection of data subjects personal data and to process this data only for the purposes for which it was collected, as well as to ensure that this data is treated with adequate levels of security and confidentiality.

Fajota, S.A. includes practices and standards regarding the protection of personal data, in order to ensure that its employees are aware of the obligations imposed on them in this context.

#### **i) Application of rights**

All rights listed can be exercised free of charge to the following email address: [qualidade@fajota.pt](mailto:qualidade@fajota.pt).

If a data subject is dissatisfied with Fajota, S.A. use of personal data or with the response after exercising any of these rights, they have the right to file a complaint with the national supervisory authority (Comissão Nacional de Proteção de Dados – CNPD | Rua de São Bento, n.º 148, 3º, 1200-821 Lisboa | Tel: 351 213928400 | Fax: +351 213976832 | e-mail: geral@cnpd.pt).

**j) Notification in the case of a personal data breach**

Notwithstanding the technical and organizational measures adopted by Fajota, SA., in the event of improper or unauthorized access to personal data, which may compromise the rights and freedoms of natural persons, the data controller will inform the supervisory authority within 72 hours after knowledge of the occurrence.

The data controller will also inform the data subject about the breach, when there is a likelihood that it will result in a high risk to the rights and freedoms of the natural person, in order to allow him to take the necessary precautions.

Águeda, 06<sup>th</sup> of September 2019

*Fajota, S.A.*