

PRIVACY POLICY

WE ARE COMMITTED TO PROTECTING THE PRIVACY AND PERSONAL DATA OF CUSTOMERS AND SITE USERS, THEREFORE, WE HAVE PREPARED THIS POLICY AND THE PRACTICES DESCRIBED HERE. IN THIS POLICY, WE EXPLAIN HOW YOUR PERSONAL DATA IS COLLECTED AND PROCESSED, THEREFORE WE ADVISE YOU TO READ IT.

1. **IDENTIFICATION OF THE ENTITY RESPONSIBLE FOR DATA PROCESSING .**

Entity: IDEPA - Indústria de Passamanarias, Lda (hereinafter, “**IDEPA**”)

CNPJ: 507165608

Headquarters : Avenida 1º de Maio, n.º 71, 3700-227 São João da Madeira

Telephone contact: +351 256 201 700

Email: marketing@idepa.com

2. **WHAT IS THIS POLICY ABOUT?**

2.1. This Privacy Policy explains how we collect and process personal data that is necessary to provide services that are available through the website, describing the practices adopted for this purpose.

3. **WHAT ARE PERSONAL DATA?**

3.1. Personal data is all information relating to a person and that identifies that person, or makes that person identifiable, regardless of the nature and support of the information, including the sound and image of the person.

3.2. Identifiable means a person who can be identified, directly or indirectly, notably by reference to an identification number or other specific elements of their physical, physiological, psychological, economic, cultural, or social identity.

4. **HOW WILL WE USE YOUR PERSONAL DATA?**

4.1. The personal data processing operations we carry out are an essential tool for your satisfaction and for **IDEPA's** activity and are carried out in accordance with applicable legislation and in accordance with the best practices.

4.2. Your personal data will not be reused for other purposes that are not previously identified or that are unrelated to the purposes for which they were initially collected.

5. WHAT ARE THE PURPOSES, BASIS AND PERIOD OF STORAGE OF THE COLLECTED DATA?

- 5.1. The personal data we process has specific grounds, depending on the purposes for which it is intended, and will be kept for as long as necessary for the respective purposes, as listed in this Privacy Policy.
- 5.2. The personal data collected is only that necessary and appropriate for the purposes indicated.
- 5.3. In the following table you can see the processing purposes and data collected, the respective grounds and the data conservation deadlines or criteria:

PURPOSE	BASIS	DATA COLLECTED	STORAGE LIFE
To analyze and follow up on your application process to work with IDEPA .	Pre-contractual due diligence	Name; E-mail; Telephone; Data contained in the CV; Data contained in the Cover Letter; Data contained in the content of the message.	1 year
To analyze and respond to your messages, information and contact requests.	Consent for this specific purpose.	Name; E-mail; Data contained in the content of the message.	For 1 year or for the period considered necessary to achieve this purpose, if longer than 1 year.
To meet your quote request.	Pre-contractual measures at the request of the data subject.	Name; E-mail; Data contained in the content of the message.	For the period that appears necessary for this purpose and, if a contract is concluded, throughout the execution of the contract.
So that we can send you <i>newsletters</i> or other publications that you have requested and/or that may be of interest to you.	Consent for this specific purpose.	E-mail	2 years or until you withdraw your consent or opt - out (unsubscribe) from this type of communication
For site management operations.	Consent for this specific purpose (cookies);	Cookies; IP address	Consult the Cookies Policy .

	Legitimate interests pursued by IDEPA .		
For fraud prevention and information systems security.	Consent for this specific purpose (cookies); Legitimate interests pursued by IDEPA .	Cookies; IP address	Consult the Cookies Policy .

5.4. If any specific or mandatory period results from the law, the data retention period will be that. In all other cases, personal data will be kept for a maximum of the deadlines indicated above, periods that **IDEPA** understands as sufficient to fulfill the purposes.

5.5. After the retention period ends, all personal data collected will be deleted.

6. NEWSLETTERS AND OTHER COMMERCIAL AND/OR PROMOTIONAL COMMUNICATIONS

6.1. We may send *newsletters* or other commercial and/or promotional communications relating to **IDEPA** whenever the user provides prior and informed consent for this purpose, checking the checkboxes provided on the website for this purpose.

6.2. The user may withdraw the consent provided at any time, through the option provided for this purpose in the footer of communications sent via email (“unsubscribe”) or through written communication addressed to **IDEPA**, to the contacts indicated in the title relating to the exercise of rights. The withdrawal of consent does not affect the treatment carried out prior to it.

6.3. The provisions of the previous paragraph do not prevent **IDEPA** , whenever it has obtained from its customers, in accordance with the Personal Data Protection legislation, the respective email address in the context of the sale of a product or service, from using it for direct marketing purposes of its own products or services similar to those being transacted , as long as it guarantees the customers in question, clearly and explicitly, the possibility of objecting, free of charge and easily, on the occasion of each message to the sending of this type of communications , for example, through the *unsubscribe* option , found in the footer of the emails.

7. HOW DO WE COLLECT YOUR PERSONAL DATA?

7.1. We will collect your personal data through the forms on the website, but also through the website and the communication it makes with your equipment and *email messages* you send to us.

7.2. Your personal data is collected through your equipment as follows:

- (a) Through your browser;
- (b) Through *cookies*;
- (c) Through *pixel tags* and other similar technologies;
- (d) IP address;

- (e) Through your User data.
- 7.3. IDEPA undertakes to treat your data in accordance with the law and legitimately.
- 7.4. IDEPA will not sell, rent, or share your personal data with third parties, except in cases clearly identified in this Privacy Policy (see Item 12 to understand how).
- 7.5. **IDEPA** services are not directed at minors, and personal data of minors is not intentionally processed.

8. WHAT ARE COOKIES?

- 8.1. *Cookies* are small information files that help identify your browser and that can store information, for example, User settings and preferences.
- 8.2. IDEPA will store *cookies on your device to personalize and make browsing as easy as possible*, but also for troubleshooting, statistics, quality assurance, and to monitor system security.
- 8.3. Except for *cookies* specifically necessary for the performance of the website, the storage of other cookies will always depend on the User's acceptance and consent, and this consent may be withdrawn at any time using specific browser tools.
- 8.4. To find out more about the cookies we use, you should consult our [Cookies Policy](#).

9. HOW DO WE PROTECT YOUR PERSONAL DATA?

- 9.1. Your personal data is kept secure through the adoption of various security measures, of a technical and organizational nature, which ensure that only Employees who are required to access it have access to personal data, in accordance with the need for access and rules created for this purpose.
- 9.2. To protect your personal data, we only use data center providers that offer us adequate and documented security measures, namely, guarantees that your personal data is stored on servers that are kept in controlled environments with limited access.
- 9.3. Although we take the care and precautions, we deem appropriate to protect the personal data you provide to us and we collect, you must be aware that no security system is impenetrable.

10. WHAT ARE YOUR RIGHTS.

- 10.1. Before we explain how you can exercise your rights, we inform you that the legislation gives you the following rights:
 - (a) Access: right to obtain confirmation as to whether or not personal data concerning you are being processed and, if applicable, the right to access your personal data;
 - (b) Rectification: the right to obtain the rectification of inaccurate personal data concerning you and to have your incomplete personal data completed;
 - (c) Erasure: the right to obtain the erasure of your personal data when one of the reasons listed in the legislation applies, namely when:
 - i. Personal data are no longer necessary for the purpose for which they were collected or processed;

- ii. Withdraw the consent on which the data processing is based and there is no other legal basis for the processing;
 - iii. If you object to the processing and there are no prevailing legitimate interests that justify it;
 - iv. Personal data has been processed unlawfully;
 - v. Personal data must be deleted to comply with a legal obligation;
 - vi. Personal data was collected in the context of offering information society services.
- (d) Limitation of processing : the right to obtain limitation of processing if one of the situations listed in the legislation applies, namely when:
- i. Challenge the accuracy of personal data;
 - ii. The processing is unlawful, and the data subject opposes the erasure of personal data and requests, in return, the limitation of its use;
 - iii. The controller no longer needs the personal data for the purposes of processing, but these data are required by the data subject for the purposes of declaring, exercising or defending legal claims;
 - iv. If the data subject has objected to processing using automated individual decisions.
- (e) Opposition: the right to object at any time to the processing of personal data concerning you;
- (f) Portability: the right to receive personal data concerning you in a structured, commonly used, and machine-readable format, and the right to transmit this data to another controller without the person responsible to whom the personal data being provided being able to prevent, when the processing is based on consent or contract, or when it is carried out by automated means.
- 10.2. You also have the right to lodge a complaint with the competent supervisory authority (in Portugal, the National Data Protection Commission at www.cnpd.pt).

11. HOW CAN YOU EXERCISE YOUR RIGHTS?

11.1. Through written contact to the following addresses :

(a) By email: marketing@idepa.com

(b) By post:

IDEPA

Marketing Department

Avenida 1º de Maio, 71

3700-227 São João da Madeira

Portugal

11.2. If you ask us to delete some or all of your personal data, some of the requested services may not be provided to you and **IDEPA** will only keep the personal data necessary to comply with the legal obligations to which it is bound.

12. WHEN DO WE COMMUNICATE DATA TO THIRD PARTIES?

- 12.1. **IDEPA** may use third parties to provide some services, in terms of maintenance, technical support, marketing, and they may have access to some personal data, in particular the data necessary for the contracted purposes .
- 12.2. **IDEPA** ensures that the entities that have access to the data are trustworthy and offer high guarantees of protection, with data never being transmitted to them beyond what is necessary to provide the contracted service, however, **IDEPA** remains as responsible for the personal data made available.
- 12.3. **IDEPA** You may also communicate your data to the following entities:
- (a) Companies in the business group to which **IDEPA** belongs to and has commercial partnerships with to create and offer benefits; or even,
 - (b) Other partners outside your business group (with your prior authorization).
- 12.4. **IDEPA** may also transmit data to third parties within the scope of investigations, inquiries and judicial and/or administrative proceedings or of a similar nature, as long as it is duly ordered by a court order to that effect.

13. THIRD PARTY SITES

- 13.1. The website may contain links to other websites which may collect and process your personal data, and such processing is the sole responsibility of the owners of such websites, and **IDEPA** is not responsible for its policies and/or practices.
- 13.2. Examples of these third parties are LinkedIn, Instagram or Facebook through the buttons that are present on the website.

14. DATA TRANSFERS OUTSIDE THE EUROPEAN UNION.

- 14.1. Your data will be processed by us within the European Economic Area.
- 14.2. If data transfers to third countries outside the European Economic Area may occur, **IDEPA** will make the necessary efforts to adopt appropriate guarantees so that these are carried out in accordance with applicable legislation.

15. THE MINORS.

- 15.1. The website is not directed to children under 18, so we ask that minors do not provide us with personal data through the website, application, social networks and social media or emails.

16. SENSITIVE PERSONAL DATA.

- 16.1. Please do not send or inform **IDEPA** of any sensitive personal data, i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health data or life data of a natural person or sexual orientation.
- 16.2. If you still send us or inform us of that kind of categories of personal data, they will be immediately deleted.

17. CHANGES TO PRIVACY POLICY.

17.1. IDEPA reserves the right to readjust or change this Privacy Policy at any time, with these changes being disclosed.

18. OUR CONTACT DETAILS.

18.1. If you have any questions or concerns regarding this Privacy Policy, please contact us in writing via email at marketing@idepa.com.

19. LATEST VERSION.

19.1. 21/10/2024 São João da Madeira (Portugal).