

The new General Regulation about Protection of Personal Data (RGPD) - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, effective from 25 May 2018, with direct application to all public or private entities that process personal data of natural persons in all EU countries, repeals the current Data Protection Act, and defines new rules ensuring protection, treatment and free circulation of personal data, in order to avoid serious breaches on such data.

Keytarcon, complying with the provisions of the new General Regulation for the Protection of Personal Data (RGPD) and defending its security, has adopted new principles and common rules that are part of the Keytarcon **Privacy Policy document, which we transcribe below:**

KEYTARCON PRIVACY POLICY

The purpose of this document is to establish and make known the rules and mechanisms for guaranteeing the privacy of all personal data received and stored by Keytarcon in the course of its commercial and work activity, namely to inform you about what categories of personal data the legal purpose and basis of the data processing, with whom we share the data, the period of data retention, the rights that you have and how you can exercise them, as well as any international transfers of data outside the EU and the obligations in case of data breach.

Keytarcon's Privacy Policy is shared across all available communication media and applies to all information you share or that you have shared with us personally, in meetings, interviews, by telephone, SMS, e-mail, letter or other means of correspondence. The processing of personal data will be carried out by Keytarcon.

If you want additional information or clarify any doubts about our Privacy Policy and Treatment of Personal Data, you can address your questions by e-mail:

Keytarcon

E-mail: protecao@keytarcon.com

1) What are personal data and wich personal data we collect and use

Personal Data is any information that can identify a person.

We collect and use the personal data in the scope of the commercial activities that Keytarcon develops, as well as in the labor relations (in the case of our employees) that it establishes. There are several types of personal data we use, namely:

- Identification data (name, identification numbers, nationality, date and place of birth);
- Contact details (for example: address, telephone, e-mail address);
- Family situation (for example: No. of descendants, fiscal situation);
- Education (level of education);
- Bank and financial data (IBAN, NIB, credit panels);
- Data related to your habits, preferences, interests and profile studies analyzed by the Marketing Department, through the purchase of our products and services and the relationships you establish with us.
- We don't collect sensitive data - biometric data, genetic data, health data, racial or ethical origin, data concerning life or sexual orientation, political opinions, religious or philosophical beliefs, with the exception of trade union membership (applicable only to employees due to compliance with legal obligations).

2) Indirect collection of other data

We may indirectly have access to personal data from:

- Family

- Legal representatives or agents;
- Partners and shareholders of the companies;
- Collaborators of our customers, suppliers, service providers and partners;

All this data will be treated with the same security and privacy.

3) What is the Basis and Purposes

Basis

Consent

Based on the prior consent of the holder of the personal data, which should be free, informed and unmistakable;

- Legitimate interest
When the processing of the data corresponds to a legitimate interest on the part of Keytarcon with a view to developing our products and services, as well as their labor relations;
- Compliance with all legal, statutory and judicial obligations
When the processing of personal data is necessary to comply all legal, regulatory and judicial obligations to which Keytarcon is subject.
- Pre-contractual procedures, execution and management of contracts
- Request your consent for a specific treatment outside this scope

Purposes

The use of personal data is necessary in particular for:

- Management and monitoring of clients / suppliers;
- Marketing and Sales activities, such as: product presentation, sending of News Letters, campaigns and promotional actions, surveys of satisfaction, market research, profiles analysis.
- Assistance services
When the processing of personal data is necessary for the execution and provision of services that we request;
- Fulfillment of all legal, regulatory or judicial obligations to which Keytarcon is bound in the commercial and labor sphere;
- Administrative, accounting and financial management;
- Training management;
- Complaints and litigation management;
- Complaints management;
- Control of access to facilities;
- Recruitment processes;
- Processes of internships;
- Participation in contests and state support programs or other;

4) With whom we share personal data

For fulfilling the purposes described above it may be necessary to share your data with:

- Official, Regulatory, Judicial and Police Entities
For compliance with all legal obligations, as well as participation of programs and support.
- Service providers and subcontractors

It may be necessary to share personal data with third parties within the scope of the activity and for each purpose, such as, for example, insurance companies, health and safety services companies, travel agencies, training companies, support for e-commerce activities, hosting of our sites, among others.

- *Business partners*
In these cases we may share your data with these partners to optimize our products and services.
- *Customers and Suppliers*
Some personal data of employees, in the scope of performing the duties that each employee performs, may have to be shared with customers and suppliers.

These entities if belonging to the EU will have the responsibility to comply with the provisions of the RGPD but Keytarcon will take all possible measures to ensure that all entities with whom we share personal data respect our Privacy Policy and therefore protect personal data entrusted to them.

1) International Transfers

Transfers of personal data to EU countries will be covered by the General Regulation on Data Protection, but in the context of Keytarcon's commercial activity which has customers and suppliers outside the EU, it may happen that personal data are shared for countries that do not have the same level security and protection, so Keytarcon will try to ensure all possible security measures, as well as compliance with our Privacy Policy.

2) What are periods of retention of personal data

The personal data will be kept for an indefinite period, that is, until the data subject requests their total or partial elimination or withdraws their consent, provided that this request does not conflict with the fulfillment of contractual or legal obligations and regulations to which Keytarcon is bound.

3) What are the rights for the holders of personal data

The holder of personal data, in accordance with the applicable rules, has the right to information, access, rectification, deletion, limitation, objection and portability of data, as well as to contest automatic decisions and to withdraw their consent.

- *Right to information, access, and rectification*
The data subject may at any time access the data that he has provided to us, request his rectification, as well as obtain information regarding his treatment, and we commit to follow up within a maximum period of 30 days.
- *Law to disposal*
The law to disposal is also recognized, and personal data will be eliminated, within the mentioned period, from the date of request, provided that there are no legal grounds valid for its conservation.
- *Law to limitation and objection*
It may require limitation as well as oppose the processing of personal data, in particular, when the data are processed for direct marketing purposes.
- *Portability of personal data*
The holder has the law to ask Keytarcon, when legally permissible, to send their personal data to another organization, unless this transfer entails high costs.
- *Automatic decisions*
When applicable, the data subject has the law to contest automatic decisions, such as the definition of profiles, requesting the human intervention of the data control.
- *Remove your consent*

The data subject can withdraw his consent, to the extent legally permissible. This doesn't compromise the legality of the treatment carried out until that date.

If the holder intends to exercise his/ her written law, he/ she may do so by e-mail to the following contact, and proof of identity of the holder is essential to guarantee security and confidentiality in the process.

Keytarcon

A/C Data Protection / Privacy Policy

E-mail: protecao@keytarcon.com

It should be noted that if there are legal norms or imperatives that override these rights Keytarcon will respond to the impossibility and the grounds of not being able to comply with the request, within a maximum of 30 days.

The data holder can complain to the National Data Protection Commission - CNPD (www.cnpd.pt).

Keytarcon values the confidence that data subject gives us in giving his consent, and has taken appropriate technical, physical and organizational measures to the RGPD ensuring that personal data are adequately protected against unauthorized or illegal use, alteration, access or disclosure, accidental or intentional destruction and loss. As an example, we mention the automatic mechanisms of preservation and control with the retention of the information in external servers and insurance protected with antivirus software.

Keytarcon's Privacy Policy applies to its employees, to individual entrepreneurs and will also extend to legal entities whenever it is concerned with the processing of the personal data of administrators, managers, legal representatives and/ or their collaborators.

Keytarcon reserves the right to change its Privacy Policy in the face of legislative changes or because of its activity.

Lisboa, 18 de Maio de 2018