

## Privacy Policy

### Who are we?

ARA-SGPS, S.A., which owns the company Ramalhos, respects the privacy of visitors to the [www.ramalhos.com](http://www.ramalhos.com) websites (desktop and mobile versions) and takes every precaution to protect their information.

### Why this privacy policy?

This Privacy Policy is the result of our intention to make Clients and Users aware of the general privacy and personal data processing regulations. The data is collected and processed in strict observance and compliance with the Personal Data Protection Law.

Ramalhos respects the best practices in the field of security and personal data protection, having approved a demanding programme for this purpose, capable of safeguarding the protection of the data made available to us by all those who in any way interact with the Company.

In this context, Ramalhos has a Personal Data Protection Officer responsible for the implementation and verification of this Privacy Policy, as well as for the defining of clear rules for personal data processing, ensuring that everyone who entrusts us with their personal data processing are aware of how the Company processes data and what rights they have in this matter.

Please read this Privacy Policy carefully because if you are accessing our website, the availability of your personal data implies knowledge and acceptance of the conditions contained herein. Thus, when making your personal data available, you are authorising the collection, use and disclosure of the data in accordance with the regulations defined herein.

### Intellectual property rights

The website content, including, but not limited to, images, texts, software, photographs, sound, music, videos, interactive resources and related material ("Content"), brands and logos ("Brands"), or any other industrial or intellectual property rights contained therein, are the property of Ramalhos, and their use by unauthorised third parties is expressly prohibited.

The website content is provided for information and personal use only and may not be used, copied, reproduced, distributed, transmitted, disseminated, sold, licenced or, in any other way, exploited for any other purpose without prior written consent from the respective owners. The user hereby declares that they will not use, disable or interfere with resources related to the security of the Website and the Application.

However, the user may print content from this website, whether for personal and non-commercial use, as long as the content is not changed, the source and copyright indication are maintained, and provided that any other indication of ownership is not removed.

Nothing on this website should be interpreted as granting any type of permission or other authorisation for use to its users.

The website may contain images or other content whose copyright belongs to third parties, such as suppliers or other entities who contribute to its construction or maintenance (such as photos from image databases).

### Contents and guarantees

The user agrees that the use of the website must be done at their own risk. To the fullest extent permitted by law, Ramalhos is exempt from any guarantees, express or implied, related to the use of the website. [www.martinserebello.com](http://www.martinserebello.com) does not guarantee the correctness or accuracy of the content made available on its

websites, and cannot be held responsible or be liable for any (i) inaccurate content or errors, (ii) personal injury or damage to property of any nature, resulting from the access and use of the website and application, (iii) unauthorised access or use of our secure servers and/or personal and/or financial information stored on them, (iv) interruptions or cessation of transmission to or from our website, (v) errors, viruses, trojan viruses or similar things which may be transmitted to or from the website, and/or (vi) errors or omissions in the content or any loss or damage occurring as a result of using content published, sent, transmitted or made available through the website (vii) unavailability or any difficulty or inability in downloading or accessing the content or any other failure in the communication system which may result in the website's unavailability.

Ramalhos cannot be held responsible for any assistance or maintenance of the website.

Ramalhos cannot be held responsible or liable for content transmitted between users or between them and any third parties outside this website.

What is covered in this privacy policy?

This Privacy Policy applies exclusively to the collection and processing of personal data carried out by this company.

Access links to other websites, which are unrelated to Ramalhos, can be found on the website. The provision of such links is done in good faith, and Ramalhos cannot be held responsible for the collection and processing of personal data carried out on these websites, nor be held responsible for the accuracy, credibility and functionality of websites belonging to third parties.

Thus, the provision of links to other websites other than Ramalhos does not imply assuming any responsibility relative to such websites, therefore, this Privacy Policy is not applicable to them. Ramalhos considers reading the Privacy Policies of all websites visited to be essential.

What is personal data?

When we refer to personal data, we refer to any information, of any nature and regardless of its medium, including sound and image, relating to an identified or identifiable individual.

An identifiable individual is a person who can be identified, directly or indirectly, namely by reference to an identification number or to one or more elements specific to the person's physical, physiological, psychological, economic, cultural or social identity.

Who is responsible for data processing?

The entity responsible for the collection and processing of personal data is Ramalhos, who provides this service and who, in the context, decides which data are collected, the means of data processing and for what purposes the data are used.

The Data Protection Officer

If you have questions regarding Data Protection and this Policy, you can contact the designated DPO by calling: +351 234 630 200.

What kind of personal data do we collect?

Ramalhos, in the scope of its activity, collects and processes the personal data necessary for the provision of services and/or supply of products, in this context, processing data such as your name, address, date of birth, gender, email address, academic qualifications, tax identification number, among other data. This information may be requested when you log in or fill out contact forms within our websites, either as an employee, job applicant, trainee, trainer, supplier, visitor, partner, among others, or when you receive or send email messages, or for services which require registration or

subscription. All personal information related to all the aforementioned stakeholders and others who use the Ramalhos websites, will be processed in accordance with the General Data Protection Regulation (GDPR).

When and how do we collect your data?

Ramalhos collects your data by phone, in writing or via its website, with your consent. As a rule, personal data is collected when the Customer subscribes to one of our products or services.

Some personal data are mandatory and, in case of lack or insufficiency of such data, Ramalhos will not be able to provide the product or service in question, so the Company will inform Clients of the mandatory nature of the data provision.

If you are not a Ramalhos Client, your data will only be processed if you make it available to the Company, specifically, if you subscribe to the sending of newsletters, in which case, the rules of this Privacy Policy will apply.

The personal data collected are processed by computer, in strict compliance with the legislation on personal data protection. It is stored in specific databases, created for this purpose and, under no circumstances, will the data collected be used for any purpose other than that for which consent was given by the data owner.

How long do we keep your personal data?

The period of time during which data is stored and saved varies according to the purpose for which the information is processed.

Effectively, there are legal requirements which require data to be kept for a minimum period of time. Therefore, and whenever there is no specific legal requirement, data will be stored and saved only for the minimum period necessary for the purposes which led to its collection or its further processing or, for the period of time authorised by the National Data Protection Commission, after which it will be eliminated.

How can you access, rectify or object to the processing of your personal data?

Under the terms of the Personal Data Protection Regulation, the data owner is guaranteed the right to access, update, rectify or delete their personal data, which may take place through the various contacts Ramalhos provides.

If you wish, you can cancel your registration or use at any time and you can choose not to receive any email messages, and you can also choose to delete all your personal information from our database.

The data owner also has the right to receive a copy of their personal information in our possession. The company reserves the right to charge a small fee for administrative and IT costs for the carrying out of this request.

If you are a user of our websites through the user registration process, your data will be stored in a specific user control database. However, the Data Owner may request its elimination whenever they wish, by a written request to our official address on the website.

How do we keep your data safe?

- Restricted personal access to your personal data based on the “need to know” criterion and only within the scope of the stated purposes;
- Transfer of collected data only in encrypted form;
- Storage of highly confidential data;

- Protection of information technology systems through firewalls, in order to prevent unauthorised access to your personal data; and
- Permanent monitoring of access to information technology systems with the objective of preventing, detecting and preventing the misuse of your personal data.

How can you object to receiving contacts for marketing purposes?

Ramalhos may promote marketing actions with its Clients for new products or services by telephone, email, SMS, MMS or any other electronic communications service, unless the Client has opposed it when collecting the data.

If you do not wish to receive these communications, you may object, at any time, to the use of your data for marketing purposes, to send information communications or to be included in lists or information services.

What measures are taken by Ramalhos to ensure the security of your personal data?

Ramalhos is committed to ensuring the security protection of the personal data made available to us, having approved and implemented strict rules relative to this matter. Compliance with these rules is mandatory for all those who legally access them.

As a result of the great concern and commitment Ramalhos demonstrates in the defence of privacy issues, several security measures, of a technical and organisational nature, were adopted in order to protect the personal data made available to us against their dissemination, loss, unauthorised use, alteration, processing or unauthorised access, as well as against any other form of unlawful processing.

In this sense, personal data collection forms require encrypted Browser sessions and all personal data, with which you provide us, are securely stored in Ramalhos systems.

Notwithstanding the security measures adopted by Ramalhos, it is our obligation to warn all those who browse the Internet that they must adopt additional security measures, namely, to ensure that they use an updated PC and Browser in terms of properly configured security patches, with an active firewall, antivirus and anti-spyware and to ascertain the authenticity of the sites they visit on the internet, avoiding websites whose reputation is not trustworthy.

How can you find out about any changes to Ramalhos' privacy policy?

Ramalhos reserves the right to make readjustments or changes to this Privacy Policy at any time, with these changes being duly publicised on the respective website.

Last update on 4<sup>th</sup> July 2018.