



## **PRIVACY POLICY**

This Privacy Policy establishes the commitment of CAPWATT BRAINPOWER, SA (hereinafter CAPWATT) with its stakeholders (eg clients, employees, suppliers) to protect the personal data of which it is responsible, aiming to contribute to strengthening and consolidating the relationship of trust and proximity to them through clear and transparent communication of what you do with these data and what rights you acknowledge to the respective owners and how you can exercise them

CAPWATT acts in strict compliance with the principles described in this policy, Regulation (EU) 2016/679 (General Regulation on Data Protection) and the applicable data protection legislation, in all activities for the processing of personal data under its responsibility.

The Privacy Policy is framed in CAPWATT's normative body of personal data protection, which includes rules and procedures for managing the security and privacy of personal data.

CAPWATT handles personal data through various operational and technical means to support the activities of its business processes

a. Goals

The main objectives of the Privacy Policy as a communication tool are:

- Strengthen and consolidate CAPWATT's relationship of trust and closeness with all its stakeholders;
- Demonstrate transparency about the purposes and treatment activities carried out by CAPWATT, as well as the deadlines for the retention of personal data in them;
- Inform the holders of personal data of their rights in relation to their protection and how they can exercise them;
- Inform the owners of the personal data who are responsible for CAPWATT to whom they can turn to exercise their rights or clarify how their personal data are processed.

b. Scope of application

The Privacy Policy applies exclusively to the processing of personal data carried out by CAPWATT in the context of the intended purposes. For the purposes of this policy, personal data shall mean any information relating to an identified or identifiable natural person (data subject). It is identifiable the data subject that can be identified directly or indirectly, namely through an identification number or through specific characteristics of his physical, physiological, genetic, mental, economic, cultural or social identity.

c. Maintenance, communication and application of policy

The Privacy Policy shall be reviewed annually by the Board of Directors, whenever there is a change of circumstances and whenever there are legislative changes, to validate that it remains current and adequate in face of applicable regulations and laws. Proposals for reviewing the policy and supervising its implementation and enforcement are the responsibility of the Governing Board.

This policy must be known to all CAPWATT employees and should be made available to its stakeholders, whenever the treatment of their personal data is concerned, through the appropriate channels, namely internet (sites, Apps) and customer support services (contact centers and physical locations).

## 1. Content of the Privacy Policy

a. Our Privacy Commitment

CAPWATT works on the basis of trust and transparency. This commitment transposes itself into the day-to-day relationship with our customers, employees and suppliers. The privacy and security of the data you trust us are a priority for us.

It is our commitment to only collect, store, process, transmit or delete your personal data with transparency and that are essential to provide you with the best services. We will inform you of how we use your personal data and for what purpose we ensure that we collect, share and store your personal data with reference to best practices in the field of security and protection of personal data.

When your personal data is collected, stored, processed, transmitted or deleted by other entities, we require the same level of privacy and security.

We want you to feel confident that your personal data is safe with us, as we will always be committed to protecting your privacy, and we take our responsibilities with regard to the protection of your personal data with great seriousness and commitment.

Whenever you have any questions about how we use your personal information, we are available to help you through the means available to you: e-mail: [Capwatt@capwatt.com](mailto:Capwatt@capwatt.com); address: Lugar do Espido - Via Norte, 4470-177 Maia; telephone +351 220 129 500 and Fax +351 220 129 521

b. Who is responsible for your personal data

CAPWATT is responsible for the processing of your personal data in accordance with the General Regulation on Data Protection and the complementary legislation on personal data protection in force in the countries in which it operates.

CAPWATT is part of a Group of Companies (Sonae Capital Group) so that your personal data may be transmitted and processed by any of the companies belonging to this Group.

c. Personal Information We May Collect

In this Privacy Policy, the term "Personal Data" means the set of information that relates to you and which enables us to identify you directly or indirectly. Your personal data may include, for example, your name, your contacts (physical or electronic).

We may also collect your personal data from other companies, in particular when they collect, process or store it in the context of a service contract.

CAPWATT may collect the following categories of personal data:

- i. Customer data - full name, address, telephone, email and tax identification number - when you purchase our products or services;
- ii. Data of users registered in sites:
  - a. The. User identification data - name, email, address, telephone contact when you create an account on our website;
- iii. Customer data for equipment under repair - name, address, telephone contact, e-mail, purchase details, warranty of the article - when requesting the repair of an item;
- iv. Services provided - name, address, telephone, e-mail, tax identification number service identification.

d. How and Why We Use Your Personal Information

We use your personal data with the following objectives:

- i. Transaction management - for issuing invoices for the acquisition of goods and services;
- ii. Marketing and direct marketing - to inform you about news and offers that may be of interest to you;
- iii. Management of users of websites or applications;
- iv. Warranties and after-sales support - to enable you to access repair services for the products you have purchased with warranty and we can repair them;
- v. Service management - so we can provide the service you have hired us.

e. For How Long We Keep Your Personal Information

We retain your personal data only for as long as it is necessary to meet the objectives set forth in d) above and to comply with the law.

Once the maximum period of conservation is reached, your personal data will be anonymised or destroyed / disposed of safely.

f. With Whom We May Share Your Personal Information

In some cases we may disclose your personal data to other entities, in the scope of services provided by them. In such cases, we require you to have the appropriate security measures in place to protect your personal data.

Your personal data may be shared with companies of our Group (Sonae Capital).

When required by law, we may have to disclose your personal data to authorities or third parties, in which case our control over how your personal data are protected is limited.

In case of transfer or access to your personal data by our Group company (Sonae Capital), suppliers or service providers based outside the European Union, we guarantee that your personal data will be processed according to appropriate security and protection measures compatible with with which we use.

g. How You Can Exercise Your Personal Data Protection Rights

In certain circumstances, you have the right to access or request us to:

- i. Additional information about the use we make of your personal data;
- ii. Your personal data;
- iii. That we transmit your personal data that you provided us to another entity;
- iv. Updating your personal data;
- v. The deletion of your personal data;
- vi. Opposition to the processing of your personal data;
- vii. The limitation on how we use your personal data while we correct them or clarify any doubts about its content or about the use that it of them we do;
- viii. The provision of a channel so that you can challenge decisions that have been based on your personal data. You also have the right to withdraw or change, at any time, the consent you have given us to use your personal data.

The exercise of these rights is exempted when your personal data are used to safeguard the public interest, especially in cases of detection and prevention of crimes, or when they are subject to professional secrecy.

To exercise your rights of protection of personal data or whenever you have any question about the use that we make of your personal data you should contact us through the means mentioned in point 1 above.

If you are dissatisfied with the way we use your personal data or with our response to your request to exercise your rights, you may submit a complaint to the National Data Protection Commission (CNPd) - Address: Rua de São Bento, 148 - 3rd , 1200-821 Lisbon - Telephone: +351213928400 - Fax: +351213976832 - E-mail address: geral@cnpd.pt.

i. Cookies

CAPWATT uses in its Websites cookies that allow us to improve the performance and browsing experience of our users, increasing, on the one hand, the speed and efficiency of response and, on the other, eliminating the need to repeatedly enter the same information.

Placing cookies not only helps websites recognize the user's device the next time they visit us, but it will also be imperative for their operation. Cookies used by CAPWATT, on all its websites, do not collect personal information that identifies the user, storing only generic information, namely the form and / or place of access of the user and how you use the websites. Cookies retain only information related to User preferences.

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| Google Analytics | Google application that allows users to store browsing data to the CapWatt.com website |
| Own              | Confirmation that sending forms was done from the page itself, not from spam systems.  |
| Own              | It is intended to keep the active session of the backoffice                            |
| Own              | Allows the cookies popup to be viewed after accepting the terms and conditions         |

j. How We Protect Your Personal Information

We have a range of information security measures, in line with best national and international best practices, in order to protect your personal data, including technological controls, administrative, technical, physical measures and procedures that guarantee the protection of your personal data, preventing unauthorized use, unauthorized access and disclosure, loss, improper or inadvertent alteration, or unauthorized destruction. We have taken on the subject of information security the same commitment of continuous improvement by which we are guided in our daily activity. Among others, we highlight the following measures:

- i. Restricted access to your personal data only by those who need them for the purposes we have set out above;
- ii. Storage and transfer of personal data only safely;
- iii. Protection of information systems through devices that prevent unauthorized access to your personal data;
- iv. Implementation of mechanisms that guarantee the safeguarding of the integrity and quality of your personal data;
- v. Continuous monitoring of information systems with the aim of preventing, detecting and preventing the misuse of your personal data;
- vi. Redundancy of storage equipment, processing and communication of personal data, to avoid loss of availability.

When required by law, we may have to disclose your personal data to law enforcement authorities or third parties, and in such cases our control over how your data is protected limited.

k. Updates to this Privacy Policy

This Privacy Policy may be updated in due course, which will be disclosed through the link <https://www.CapWatt.com/en/politicasdeprivacidad>