

## PRIVACY POLICY

Cookies Policy and Terms of Use

Online digital platforms – website and Mobile application (App)



## THE PURPOSE AND SCOPE

This document aims to explain the general principles of the Privacy Policy and Protection of Personal Data, Cookies Policy and Terms of Use (in general "Privacy Policy"), within the scope of the online digital platform of OLI - Sistemas Sanitarios, S.A. (OLI, "We", "our"), and subsidiary companies (OLI Group), regarding visitors and users (the "user") of our website ("site") and mobile application (App).

Our Privacy Policy describes how we collect, use and treat your personal data and, in doing so, how we comply with our legal obligations towards you. Your privacy is important to us and we are committed to protecting and safeguarding the data you provide us. We also provide relevant information about the proper use of our website / App.

This Privacy Policy applies to the personal data of users - registered and unregistered - of the website/App, and possible candidates who submit their job applications online or by electronic means, in order to assess job opportunities, internships or objectives related.

The purpose of OLI is to promote a relationship of trust and transparency with the users of its online platforms, with the objective of performing legitimate, clear and delimited purposes, in accordance with the principle of minimizing the requested data, limiting their conservation, integrity and confidentiality thereof, and proceeding with the processing of personal data of its holders in compliance with their respective rights and in accordance with the provisions, in particular:

- in the General Regulation on Data Protection GDPR Regulation 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of individuals with regard to the processing of personal data and on the free movement of such data;
- in Law no. 58/2019, of 8 August 2019, which ensures the execution, in Portuguese legal order, of the GDPR,

without prejudice to other national or European Union legislation, applicable in matters of privacy, data protection and electronic communications.

If you have questions about our Privacy Policy, you can contact us directly. You can also contact us with a view to exercising the rights conferred on you, among others those described in this document.

This Privacy Policy applies equally to other countries where OLI Group companies operate.



## 2. WHAT PERSONAL DATA IS AND WHAT IT MEANS?

**Personal data** is any information about a specific person, identified or identifiable, called the data subject.

Examples of personal data are: your name, the number or alphanumeric sequence of an official identification document, a cultural profile, the profession, location data, or even elements of your physical identity, among others.

There are special categories of personal data that **cannot** be processed. Examples: racial or ethnic origin, union membership, political opinions, philosophical or religious beliefs, and others.

The **processing of personal data** is any operation carried out, by automated and non-automated means, on this same data and which involves one or more of the following procedures: collection, registration, consultation, use, transmission, alteration and deletion.

## 3. WHO IS RESPONSIBLE FOR THE TREATMENT OF YOUR DATA?

The entity responsible for processing the data is OLI – Sistemas Sanitários, S.A.

• Address: Travessa de Milão, Esgueira, Aveiro 3800-314, Portugal.

• Email address: <u>privacy@oli-world.com</u>

• Phone number: +351 234 300 200

# 4. WHAT TYPE OF PERSONAL DATA WE COLLECT AND WHAT IS THEIR PURPOSE?

In collecting and processing data, OLI complies with the applicable legal obligations and is always attentive to legitimate principles and rules, requesting the consent of the data owner if necessary, for its treatment.

The personal data of the user of our website / App will be treated with the following purposes, depending on the situation:

- Contact details: If you want to contact us for any reason (eg for clarification, information, suggestions or complaints), we need to collect and use information about you such as: name, email, telephone contact and, eventually, address, if necessary to fully and timely fulfil the purpose of your contact.
- Website / App users: We collect a limited amount of data, which we use to help us improve
  your experience when using our website / App, as well as to help us manage the services we
  provide, analyzing the criteria of your recent search. Thus, we will be able to send information
  about new products or initiatives, and personalized information, which will allow us to present



you with solutions that we believe will be of interest to you through our communication channels and / or digital platforms.

- In the specific case of the mobile App, within the scope of this Privacy Policy, your access depends on the download of the application in reference stores (for iOS or Android systems) and installation on your mobile device, which determines that the user agrees with the terms of its use and treatment of data, as well as a previous registration that will allow a login. This registration implies the indication of your email, creation of a user name and a password, which must be complex to safeguard the security of your access, and will be encrypted. We will also request the indication of your profession so that we can assess, globally, if the users are end customers or professionals connected to the market branch to which OLI directs its product offer (ex. Architects, civil builders, etc.). We remind you that your ID (username + password) is valuable, so as a registered user, you must maintain the confidentiality of your access data and the security of your mobile device, and OLI is not responsible for any loss or damage resulting from the unauthorized use of such data or equipment. We will ask for your email address when filling out the forms "Talk to us" and "Application Feedback". You may enter a different e-mail, different from yours, when using the application's recommendation form. If you suspect that your identification and password have been compromised, or when your mobile device on which the application is installed is lost or stolen, please contact us.
- **Newsletter subscription**: We collect your data to send our newsletter periodically and, where appropriate and in accordance with local laws and regulations, we may also use your data for other purposes, such as marketing actions or monitoring diversity. In certain cases, we may ask for your prior consent to carry out these initiatives.
- Job applications via online form or by email: In order to provide you with employment, internship or related opportunities, we need to collect certain information from you. This information will be processed for the purpose of evaluating your job application, hence it is essential for us to obtain your name, age, contact details, nationality, address, postal code, locality and country, information on academic qualifications, level of spoken languages and writing, computer skills, and other skills. If you want to, you can optionally provide us with other information relevant to your job application. If you want to send your *Curriculum Vitae* directly we suggest using the European Union guidelines regarding the form and content of the same (Europass).



## 5. LEGITIMACY FOR THE TREATMENT OF YOUR DATA

## a. Legitimate interests

The GDPR regulates the legitimate interests of data processing. This Regulation guarantees that we can process your data if necessary, for the purpose of the legitimate interests pursued by us, unless the interests or fundamental rights and freedoms of the owner prevail, which require the protection of personal data.

We do not consider that any of our activities affect your interests, rights or freedoms in any way, but rather they help us to offer you a personalized, more appropriate and efficient service, also providing Customer and / or User Support whenever requested through the contacts we provide. However, as a data subject, you have **the right to object** to our treatment of your personal data by invoking a legitimate interest.

#### b. Consent.

In certain circumstances, we are required to obtain your consent for the processing of your personal data in relation to certain activities. Depending on the type of treatment given to your information, this consent will be for inclusion or soft opt-in.

The GDPR, in a simplified form, establishes that:

- You must give us your free consent;
- You should know what you are consenting to, so we will make sure that we provide you with adequate and sufficient information;
- You should have control over which treatment activities you consent to or not;
- You must provide your consent regarding the transmission of personal data in an unambiguous and well-defined manner.

In this context, on our platforms (website / App) there will be a specific place to signal your acceptance, so that this requirement is met in a clear and manifest manner. Which is why we will keep records of the consents given by you in this way.

## c. Age and consent

If the user of our website / App is under the age of 13, treatment is only lawful if consent is given by their legal representatives, preferably using secure authentication means. Since we do not know the age of users of our website / App, we advise against having our platforms accessed or installed by these minors.

If you wish, please consult Law n° 58/2019, of 8 August, which ensures the execution of the GDPR, in particular its article 16.



## 6. WITH WHOM WE SHARE YOUR DATA?

Unless otherwise stated on your part, we may share your information with any of the companies in our group or associated third parties, as well as with certain service providers (namely, of technical and programming scope), which may imply access to users' personal data by those third parties. These subcontracted entities satisfy the applicable legal requirements and offer adequate guarantees regarding data protection and confidentiality.

Unless otherwise stated on your part, we may share your information with providers of network analysis services, marketing automation platforms and social networking services in which we are present, in order to ensure that the feedback you receive is addressed to you and is within the scope of your interests.

In certain cases, personal data that is transmitted by the users of the website / App may be transferred to third parties, or their subcontractors, that provide services and also operate outside the European Union or the European Economic Area (eg cloud storage).

## 7. HOW WE SAVE YOUR PERSONAL DATA?

The protection of your data is essential for us, reason why we apply advanced technical and organizational security measures, appropriate and designed to prevent the improper or unauthorized loss, dissemination, alteration, access and treatment. That is, the occurrence of a data breach.

A breach of security is understood to mean any breach of security that causes, accidentally or unlawfully, the loss, alteration, destruction, disclosure or unauthorized access to personal data being processed.

## 8. DURING HOW LONG WE KEEP YOUR PERSONAL DATA?

The data collected and processed by OLI will be kept until they are no longer needed for the purpose of interaction with the user or as long as their registration remains active.

However, if in a period of three years we have not had relevant contact with you or if, even before, OLI deems it appropriate, we will delete your personal data from our systems, unless there is a legal rule or judicial decision that requires its conservation, or legislation that determines a shorter conservation period. However, at any time you can exercise your right to erase your data, as the data holder.



# 9. HOW CAN YOU ACCESS, CHANGE OR REMOVE PERSONAL DATA YOU PROVIDE?

As the holder of your personal data, you have your own rights in relation to them.

These rights are described in detail in the <u>General Data Protection Regulation</u> (Chapter III - Rights of the Data Subject). You can check the terms of those specific rights in the following languages: <u>portuguese</u>, <u>english</u>, <u>germany</u>.

If you want to exercise any of the rights that assist you, please contact us.

We will endeavour to process your request without undue delay and, normally, within up to thirty days. This period may be subject to extensions permitted by law. Please note that we may keep a record of your communications to help us resolve any issues raised by you, or other relevant elements, in an aggregated form and in an anonymized format

## Your rights are:

- **Right of opposition**: If we are using your data because we believe it is necessary for our legitimate interests, and you do not agree, you have the right to object. We will respond to your request within up to thirty days, although in certain cases it is allowed to extend this period. As a general rule, we will only disagree with you if certain limiting conditions apply (for example, arising from legal obligations or court orders).
- **Right to withdraw consent**: At any time, you can withdraw your consent for us to process your personal data, which we collect for purposes such as: sending a newsletter or direct marketing actions.
- Data Subject Access Requests: You have the right to ask us, at any time, to confirm the
  information we have about you, and you can ask us to change, update, limit or delete it. In that
  circumstance we can:
  - a) Request that you confirm your identity or ask for more information about your order;
  - b) Refuse your request, invoking the reason and justifying the decision.
  - On the right to erasure: In certain situations, the data subject has the right to have them no longer processed, to be erased and eliminated, under certain conditions:
    - holders withdraw their consent or object to the processing of data;
    - the processing of personal data violates legal provisions;
    - the data is no longer necessary for the purpose that was collected.

If there is no legal, administrative or judicial impediment, we will delete your data within up to thirty days, a period that may be subject to extension under the terms of the law. In this context we may ask you to confirm your identity or ask you for more information about your order.



- **Right to data portability (data transfer)**: If you wish, you have the right to transfer your data to another person responsible for the respective treatment. We will transfer your data directly to you or provide you with a copy in an automatic reading format in current use.
- **Right to know of a data breach:** The holder of personal data has the right to be informed following any breach of security that compromises his data. We will take care of that, also reporting this to the supervisory authority. (CNPD).
- **Right to complain to a supervisory authority**: You also have the right to submit a complaint to your local supervisory authority, which you can do here, in the case of the Portuguese authority (CNPD.

## 10. MARKETING ACTIVITIES

From time to time, we may send you information that we consider to be of interest to you, if this has been demonstrated through any request for information made using the form on our website / App or direct email. In particular, we may need to use your data for the purposes exemplified below, always in compliance with the legal regulatory provisions, **otherwise that use will not be made:** 

- Development and commercialization of other products and services;
- Sending news about promotions, offers, or information about events that we think may be of interest to you;
- Presentation of promotional excerpts on the OLI website / App as a success story (only when we have obtained your express consent to do so);

We need your **consent** for some aspects of these activities that are not covered by our legitimate interests (in particular, the collection of data through cookies and the provision of direct marketing through digital channels) and, depending on the situation, we will request it through inclusion option or soft opt-in.

Soft opt-in is a specific type of **consent** that applies when you have previously accessed our website / App. In terms of soft opt-in consent, we will consider that this has been given, unless, or until, the user self-excludes himself. This type of consent allows us to suggest other products or information along with those you are researching, considerably increasing the probability of finding, with greater speed and accuracy, what may be the object of your interest.

For other types of electronic marketing, we are required to obtain your specific consent. If you do not agree with our marketing approach, you have the right to withdraw your consent at any time.

We want you to know that if you have self-excluded from our marketing communications, it is possible that your data can be recovered through public / open sources. We will try to make sure that this does not happen, but if it does, we cannot immediately avoid this situation. You should therefore contact us.



## 11. COOKIE POLICY

## What is a cookie?

A cookie is an information file that is stored on your device (eg computer, tablet, smartphone) through the respective browser and that registers the navigation on a website / App so that, when you visit it again, you are presented with options based on the information stored, also allowing faster access / login.

Cookies are also used to aggregate information about the flow and interactions of the website, in order to offer tools that promote better browsing experiences. Our mobile app does not use cookies.

#### How we use cookies?

We use these testimonials to connect with different functions, which will help us to develop and improve our service, allowing you to present solutions adapted to your preferences when you next visit. We may also use cookies to adjust our marketing and advertising.

#### We use:

- **Session cookies (user)**: these are stored on your device during your browsing session and are automatically deleted when you close your browser. Usually store an anonymous session ID, but do not collect any information from your device;
- **Persistent cookies**: a persistent cookie is stored as a file on your device and remains when you close your browser. The cookie can be read by the website that created it when you return to visit those online platforms. We use persistent cookies from Google Analytics and others.

The cookies we use can also be qualified as:

- **strictly necessary:** they are essential to enable you to use the website efficiently, such as when applying for a job opportunity, and therefore cannot be disabled. Without them, the services that are available on the website cannot be provided in full. These cookies do not collect information about you that can be used for the purpose of, for example, marketing.
- **of performance**: allow us to monitor and improve the performance of our website. For example, they allow us to count visits, identify sources of traffic and see which places on the website are preferred by users, for statistical purposes.
- **of functionality**: allow our website to "remember" the choices you make and provide improved functionality. For example, we may provide you with news or updates relevant to the services you use. They can also be used to provide services you have requested. The information that these cookies collect is normally anonymized.
- **third-party** come from a different domain than our website, that is, they belong to third parties. This happens, for example, in the case of links to social networking websites or multimedia content.



We use, in particular, the following cookies, under the conditions, time and the identified purposes:

Session cookies (user), required, of functionality and of performance

#### Session cookies (user), required, of functionality and of performance

- o Provider: oli-world.com
- o Cookies: lang, eucookie, oliusa
- o Duration: per session
- Type: session.
- These are necessary, functional and performance cookies;
- Purpose: they are essential for the functioning and performance of the website, as
  they manage user preferences and other anonymous data to provide a better
  experience to identify user preferences.

#### ■ Third Party Cookies

- o Provider: google.pt
- Cookies: SIDCC, \_\_Secure-APISID, \_\_Secure-SSID, HSID, \_\_Secure-3PSID, \_\_Secure-3PSIDCC, \_\_Secure-3PAPISID, APISID, \_\_Secure-HSID, SSID, SAPISID, SID, NID,1P JAR, OTZ
- o Duration: 2 years;
- o Type: persistent;
- o They are also functional cookies;
- Purpose: When you create a Google account or sign in, the cookies presented are stored on your computer so that they remain connected to your Google account when you use the service again. While connected to a website like ours, Google uses these cookies to improve your user experience. Some of the cookies are also used to improve certain navigation functions, for example, when using Google maps.
- o Provider: youtube.com
- o Cookies: VISITOR\_INFO1\_LIVE, PREF, use\_hitbox, YSC
- o Duration: 2 years;
- o Type: persistent;
- They are also functional cookies;
- Purpose: These cookies are used to store user preferences, define the user's preferred language, measure bandwidth, increase the video view counter and services on pages containing embedded YouTube videos.
- o Provider: Google Analytics;
- o Cookies: \_utmz, \_ga , \_gid, \_\_utma
- o Duration. 2 years;
- o Type: persistent;
- o They are also functional cookies;
- O Purpose: These are analytical cookies designed to collect information about the use of the website by the user.

To find out about the legal and interpretative framework established by the European Union on cookies and their use, you can see <a href="here">here</a>.



#### How to refuse cookies?

If you do not wish to receive cookies that are not strictly necessary to perform basic functions of our website, you can opt out by changing your browser's privacy settings.

However, refusing all cookies means that you may not be able to fully enjoy all the features of our website. If you disable or delete these cookies, it may be necessary to exit the page you are on and log in again.

You should check your browser's "Help" menu to find out the proper procedures for changing your preferences. Other relevant information about browsers and how to disable cookies can be obtained here:

Chrome

**Edge** 

Safari

Mozilla Firefox

**Internet Explorer** 

**Opera** 

For more specific information about cookies, including how to disable and delete them from your device, see <a href="https://www.aboutcookies.org">www.aboutcookies.org</a>.

## 12. HOW TO CONTACT YOUR CONTROL AUTHORITY?

A Comissão Nacional de Proteção de Dados (CNPD) is the supervisory authority in Portugal, and you can contact it through several channels:

- Address: Rua de São Bento, nº 148-3º, 1200-821 Lisboa
- Telephone (+351) 213 928 400 / Linha de Privacidade: (+351) 213 930 039
- Email: geral@cnpd.pt www.cnpd.pt
- Complaint submissions <u>here</u>.

#### 13. INTELLECTUAL PROPERTY CONTENT AND RIGHTS

Unless otherwise stated, texts, images, illustrations, graphics, sounds, animations and videos, graphic design as well as website / App web design are the property of OLI and are protected by applicable legislation regarding copyright and related rights, intellectual property rights and, where appropriate, industrial property rights. The content of this website / App may not be copied, reproduced or altered for commercial or other purposes, nor made available to third parties for reproduction.

Any use, by any means or form, of the contents of the website / App, or of any rights of OLI or of any group company, whether total or partial, requires prior and written authorization from OLI. The user, accessing our website / App, undertakes not to perform any act that is likely to violate OLI's rights mentioned above.



This website / application may contain links to websites operated by companies other than OLI or the OLI Group. OLI does not control any content on these websites and is not responsible for them.

## 14. USAGE AND PROHIBITED CONDUCTS

As a user of our Website / App platforms, you have the obligation not to illicitly use or attack OLI systems, and you may be held responsible if you do or try to do so. Examples of these illicit behaviours are, among others: a) installing or attempting to install a computer virus; b) break the security of the system or test any vulnerabilities in the system; c) promote or try to promote actions of the "denial of service" type; d) send, or attempt to send, SPAM to any e-mail addresses we make available to you for contact.

## 15. SUSPENSION OR INTERRUPTION OF ACCESS

We have the prerogative to suspend or interrupt access to the website / App for the period we deem appropriate or necessary, and for reasons of any kind, which may be, among others, technical reasons, maintenance of the website / App, cases of force majeure or security reasons.

## 16. CHANGE IN PRIVACY POLICIES

We may occasionally change our Privacy Policy. If you want to stay up to date, visit our website / App and its privacy page regularly.

Updated on July 21, 2020