

## SUGO CORK RUGS PRIVACY POLICY

TAPETES DECORATIVOS COM CORTIÇA, LDA. (ahead, SUGO CORK RUGS), headquartered in Rua de Meladas, n.º 105, 4535-186 Mozelos, Santa Maria da Feira, Portugal and Tax Registration Number 513751262 is a company that develops the design, fabrication and trade of natural yogurt makers with cork and other goods, made out of cork and other natural materials, that allow for better environmental practices, being the owner of the domain *sugocorkrugs.com*, where its WEBSITE is hosted.

SUGO CORK RUGS IS FOCUSED ON PROTECTING THE PRIVACY AND PERSONAL DATA OF ITS CUSTOMERS AND USERS OF THE WEBSITE, WHEREFORE, IT HAS PREPARED AND ADOPTED THE PRESENT POLICY AND THE PRACTICES DESCRIBED HEREIN. THIS PRIVACY POLICY EXPLAINS HOW WE USE YOUR PERSONAL DATA, BY WHICH WE ADVISE YOUR READING SO AS TO KNOW THE CONDITIONS UNDER WHICH YOUR PERSONAL DATA ARE COLLECTED AND FURTHER PROCESSED.

### **1. WHAT IS THIS POLICY ABOUT?**

- 1.1. This Privacy Policy explains how we collect and process the personal data that are necessary for the provision of services that are available through the WEBSITE.
- 1.2. Examples of these services are the provision of the products and services available on the WEBSITE and to send newsletters.
- 1.3. The objective is for these services to be provided in an expeditious and undisturbed way, describing the practices adopted for this purpose.

### **2. WHAT ARE PERSONAL DATA?**

- 2.1. Personal data is any information relating to a person that identifies that person or makes it identifiable, regardless of the nature or support of the information, including the sound and image of that person.
- 2.2. Examples of personal data we collect are: name, phone number, e-mail.
- 2.3. The term "identifiable" refers to a person who can be identified, directly or indirectly, in particular by reference to an identification number or other specific elements of his or hers physical, physiological, psychic, economic, cultural or social identity.

### **3. HOW DO WE USE YOUR PERSONAL DATA?**

- 3.1. SUGO CORK RUGS will use the personal data you provide us for the following purposes:
  - (a) To supply the products available on the WEBSITE, social networks and social media;
  - (b) To analyze and respond to your messages, customer support and inquiries;
  - (c) For the online store's user registration;

- (d) To register and process your order;
  - (e) To analyze and respond to job inquiries and job applications;
  - (f) To send *newsletters* or other publications that you have requested and / or that may be of interest to you;
  - (g) For operations and management of the WEBSITE;
  - (h) To keep track of your contact details;
  - (i) To analyze and respond to reseller applications;
  - (j) For commercial purposes, such as data analysis, audits;
  - (k) For marketing, promotion and commercial prospecting;
  - (l) For fraud prevention;
  - (m) For the adaptation, improvement and modification of services, in particular by identifying trends in use, or to determine the effectiveness of promotional campaigns;
  - (n) For the expansion of SUGO CORK RUGS's commercial activities.
- 3.2. These operations of personal data processing are an essential tool for your satisfaction and for SUGO CORK RUGS's activity and are carried out according to the applicable legislation and the best practices.
- 3.3. Your personal data will not be reused for other purposes not previously identified or that have nothing to do with the purposes for which they were initially collected.

**4. WHAT ARE THE LEGAL BASIS FOR OUR PROCESSING OF PERSONAL DATA?**

- 4.1. The personal data that SUGO CORK RUGS processes have specific grounds according to the purposes for which they are intended.
- 4.2. In the following table you can see the legal basis for the processing regarding the above mentioned purposes:

PURPOSES	LEGAL BASIS
To supply the products available on the WEBSITE, social networks and social media;	Contractual performance as requested by the data subject;
To analyse and respond to your messages, customer support and inquiries;	Consent for this specific purpose;
For the online shop's user registration;	Pre-contractual performance as requested by the data subject;
To register and process your order;	Contractual performance as requested by the data subject;
To analyse and respond to job inquiries and job applications;	Consent for this specific purpose;
To send newsletters or other publications that you have requested and / or that may be of interest to you;	Consent for this specific purpose;

Comentado [PRA1]: Adaptar.

For operations and management of the WEBSITE;	Consent for this specific purpose (cookies); Legitimate interests pursued by SUGO CORK RUGS;
To keep track of your contact details;	Consent for this specific purpose;
To analyse and respond to reseller applications;	Pre-contractual performance as requested by the data subject;
For commercial purposes, such as data analysis, audits;	Consent for this specific purpose (cookies); Legitimate interests pursued by SUGO CORK RUGS;
For marketing, promotion and commercial prospecting;	Consent for this specific purpose;
For fraud prevention;	Legitimate interests pursued by SUGO CORK RUGS;
For the adaptation, improvement and modification of services, in particular by identifying trends in use, or to determine the effectiveness of promotional campaigns;	Consent for this specific purpose (cookies); Legitimate interests pursued by SUGO CORK RUGS;
For the expansion of SUGO CORK RUGS's commercial activities.	Legitimate interests pursued by SUGO CORK RUGS.

**5. WHAT PERSONAL DATA DO WE COLLECT?**

5.1. The personal data that SUGO CORK RUGS collects and processes are only those which are necessary and suitable for the abovementioned purposes.

5.2. SUGO CORK RUGS will collect and process the following personal data:

PURPOSE	DATA
To supply the products available on the WEBSITE, social networks and social media;	E-mail; Name; Telephone Number; Cellphone Number; Invoice Address; Delivery Address; Country; Location; Postal Code; Tax Number; Order remarks;
To analyse and respond to your messages, customer support and inquiries;	E-mail; Name; Message;
For the online shop's user registration;	E-mail; Password;
To register and process your order;	E-mail; Name; Telephone Number; Cellphone Number; Invoice Address; Delivery

Comentado [MAS2]: Adaptar.

	Address; Country; Location; Postal Code; Tax Number; Order remarks;
To analyse and respond to job inquiries and job applications;	E-mail; Name; CV;
To send newsletters or other publications that you have requested and / or that may be of interest to you;	E-mail; Name;
For operations and management of the WEBSITE;	Cookies;
To keep track of your contact details;	E-mail; Name; Telephone Number; Cellphone Number;
To analyse and respond to reseller applications;	E-mail; Name; City; Country; Telephone Number; Cellphone Number; Message/Comment;
For commercial purposes, such as data analysis, audits;	E-mail; Name;
For marketing, promotion and commercial prospecting;	E-mail; Name;
For fraud prevention;	E-mail; Name;
For the adaptation, improvement and modification of services, in particular by identifying trends in use, or to determine the effectiveness of promotional campaigns;	Cookies;
For the expansion of SUGO CORK RUGS's commercial activities.	Cookies; E-mail; Telephone Number.

**6. HOW DO WE COLLECT YOUR PERSONAL DATA?**

- 6.1. We will collect your personal data through the forms on the WEBSITE, but also through the WEBSITE and the communication that it makes with your device and e-mail messages that you send us.
- 6.2. Your personal data are collected through your device as follows:
- (a) Through a request for information forms;
  - (b) Through your user account registration;
  - (c) By subscribing to the *newsletter*;
  - (d) Through a reseller application form;
  - (e) Through your browser;
  - (f) Through *cookies*;
  - (g) Through *pixel tags* and other similar technologies;
  - (h) IP Address;
  - (i) Through your user data.
- 6.3. SUGO CORK RUGS is committed to process your data lawfully and legitimately.

- 6.4. SUGO CORK RUGS will not sell, rent or share your personal data with third parties, with the exception of the clearly identified cases in this Privacy Policy (see Point 12 to understand how).
- 6.5. SUGO CORK RUGS's services are not intended for minors and no personal details of minors are or will be processed intentionally.

**7. WHAT ARE COOKIES?**

- 7.1. *Cookies* are small information files that help identify your browser and can store information, for example, User settings and preferences.
- 7.2. SUGO CORK RUGS will store cookies on your device to personalize and facilitate browsing as well as for troubleshooting, statistics, quality assurance, and to monitor system security
- 7.3. With the exception of *cookies* specifically required for the performance of the website, the storage of other *cookies* will always depend on the acceptance and consent of the User, and this consent may be withdrawn at any time through specific browser tools.
- 7.4. To know more about the cookies we use please refer to our **Cookies Policy**.

**Comentado [PRA3]:** Inserir, por favor, link para a política de cookies.

**8. WHAT ARE PIXEL TAGS AND OTHER SIMILAR TECHNOLOGIES?**

- 8.1. Pixel Tags (also known as web beacons and clear GIF's) can be used in connection with some services to, for example, track the actions of service users (including email recipients), measure the success of our marketing campaigns, and compile statistics on the use of the Services and response rates.
- 8.2. To know more about the pixel tags and other similar technologies that we use please refer to our **Cookies Policy**.

**Comentado [PRA4]:** Inserir, por favor, link para a política de cookies.

**9. HOW DO WE PROTECT YOUR PERSONAL DATA?**

- 9.1. Your personal data are kept safe through the adoption of various security measures, of technical and organizational nature that assure that only employees have access to the data and to the processes to access them according to rules created for that purpose.
- 9.2. In order to protect your personal data, we only use data center providers who provide us with adequate and documented security measures, namely that your personal data are stored in servers that are kept in controlled environments with limited access.
- 9.3. Your data are kept in secure servers next to BONUSCLOUD - UNIPESSOAL, LDA. (ahead, "BONUSCLOUD") with Tax Registration Numbe 510977413 headquartered in Rua dos Passionistas, 150 - 3º Esq. 4520-292 Santa Maria da Feira (Portugal) which offers us all necessary security safeguards that allow for data protection against its diffusion, loss, misuse, alteration, processing or unauthorized access as well as against any other form of illicit processing.
- 9.4. Similarly, when browsing the WEBSITE, we protect your data through the use of encryption, such as Transport Layer Security (TLS), and your password is stored using an unidirectional hash, in other words, it cannot be retrieved (or disclosed) by anyone, including SUGO CORK RUGS, and can only be redefined.

9.5. Although we take all necessary precautions we deem appropriate to protect the personal data you provide and we collect, one must be aware that no security system is impenetrable.

9.6. Therefore, you should take certain precautions, such as keeping your password secret and not disclosing it to anyone; If you think your password has been misused, you should let us know right away; You should also be careful when starting and ending your session every time the browser closes.

#### **10. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

10.1. Your personal data will be kept for the time required for the purposes for which they are intended, as set forth in this Privacy Policy, as follows:

<b>PURPOSE</b>	<b>PERIOD</b>
To supply the products available on the WEBSITE, social networks and social media;	5 years
To analyse and respond to your messages, customer support and inquiries;	1 year
For the online shop's user registration;	5 years
To register and process your order;	5 years
To analyse and respond to job inquiries and job applications;	1 year
To send newsletters or other publications that you have requested and / or that may be of interest to you;	5 years
For operations and management of the WEBSITE;	5 years
To keep track of your contact details;	5 years
To analyse and respond to reseller applications;	5 years
For commercial purposes, such as data analysis, audits;	5 years
For marketing, promotion and commercial prospecting;	5 years
For fraud prevention;	5 years
For the adaptation, improvement and modification of services, in particular by identifying trends in use, or to determine the effectiveness of promotional campaigns;	5 years
For the expansion of SUGO CORK RUGS's commercial activities.	2 years

10.2. If any specific or mandatory period of time is required by law, the data's retention period will be that mandatory period. In all other cases, the personal data will be kept, at most, during the time above indicated, which SUGO CORK RUGS deems as sufficient to fulfill its purposes.

10.3. At the end of the storage period, all collected personal data will be deleted.

#### **11. HOW YOU CAN YOU EXERCISE YOUR RIGHTS:**

11.1. Before we explain how you can exercise your rights, you should know what they are. Thus, the law grants you the right to request us the exercise of the following rights:

(a) Access: the right to confirm whether your personal data are being processed or not, and, if so, the right to access your personal data;

- (b) Rectification: the right to rectify any inaccuracy regarding your personal data and to complete personal data that are incomplete;
- (c) Erasure: the right to erase your personal data when one of the grounds listed in the legislation is applicable;
- (d) Restriction of processing: the right to limit data processing, if one of grounds listed in the legislation is applicable;
- (e) Objection: the right to object, at any time, to the processing of your personal data;
- (f) Data portability: the right to receive your personal data in a structured, commonly used and machine-readable format.

11.2. You also have the right to lodge a complaint with a supervisory authority (National Data Protection Commission at [www.cnpd.pt](http://www.cnpd.pt))

11.3. For the purpose of exercising the rights abovementioned, you should contact SUGO CORK RUGS via this email [info@sugocorkrugs.com](mailto:info@sugocorkrugs.com).

11.4. 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 SUGO CORK RUGS will keep the necessary personal data to fulfill its legal obligations.

## 12. **WHEN DO WE COMMUNICATE DATA TO THIRD PARTIES?**

12.1. SUGO CORK RUGS may use third parties to provide certain services, such as maintenance, technical support, marketing, billing or payment management, which may have access to some personal data, namely, data required for contractual purposes.

12.2. SUGO CORK RUGS ensures that the entities that have access to the data are credible and offer high guarantees of protection, and that that data will never be transmitted beyond what is necessary to provide for the contracted service, nevertheless SUGO CORK RUGS remains responsible for the personal data made available.

12.3. *For example, for the purposes of data center management, SUGO CORK RUGS uses the services provided by [COMPANY2].*

12.4. SUGO CORK RUGS may also communicate its data to companies in its business group with whom SUGO CORK RUGS has commercial partnerships to create and offer benefits or to other partners outside its business group. However, we will only make such communication with your authorization.

12.5. SUGO CORK RUGS may also transmit data to third parties in the context of investigations, inquiries and judicial and / or administrative proceedings or of similar nature, provided that it is duly ordered by a court.

## 13. **THIRD PARTY WEBSITES.**

13.1. The WEBSITE may contain links to other websites which may collect and process your personal data, and this processing is the sole responsibility of the owners of these websites, and SUGO CORK RUGS does not take any responsibility for its policies and / or practices.

**Comentado [PRA5]:** Se aplicável

13.2. Example of such third parties are Facebook, Instagram or Google (Youtube) through the buttons that are present on the WEBSITE.

**14. TRANSFERS OF DATA OUTSIDE THE EUROPEAN UNION.**

14.1. If data transfers to non-EU countries occur, SUGO CORK RUGS will comply with the law, in particular regarding to the data protection adequacy of the country to where the personal data will be transferred to, and the requirements applicable to such transfers. Therefore, personal data will not be transferred to jurisdictions that do not offer security and protection guarantees.

**15. MINORS.**

15.1. The WEBSITE is not intended for minors under the age of 16, thus, we request that minors do not provide us with personal information through the WEBSITE, application, social media and/or emails.

**16. SENSITIVE PERSONAL DATA.**

16.1. SUGO CORK RUGS asks you not to send us any sensitive data, in other words, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union association, genetic information, biometric information, health or data relating to a natural person's sexual life or sexual orientation.

16.2. These personal data will be deleted immediately.

**17. CHANGES TO PRIVACY POLICY.**

17.1. SUGO CORK RUGS reserves the right to readjust or change this Privacy Policy at any time, as these changes will promptly be advertised.

**18. OUR CONTACT DETAILS.**

18.1. If you have any questions or concerns regarding this Privacy Policy, please contact us by writing to us via email [info@sugocorkrugs.com](mailto:info@sugocorkrugs.com).

**19. LAST VERSION.**

19.1. 28.08.2018, Mozelos (Portugal)