



DATA PROTECTION AND PRIVACY POLICY

Aimed at all personal data holder

1. General considerations

ECO-OIL respects the privacy of all personal data holders and values the relationship he has with himself. This Data Protection and Privacy Policy aims to make known how ECO-OIL treats your personal data and guarantees your privacy in the development and performance of its activities, namely:

- Principles applicable to the protection of your personal data
- Personal data, treatment of personal data and data subject
- Category of personal data that ECO-OIL handles
- Purposes for the processing of your personal data
- Lawfulness fundamentals
- Period of retention of your personal data
- Sharing of your personal data
- International flows of personal data
- Your rights and how you can exercise them
- The Data Protection Officer
- Security of your personal data
- Confidentiality

2. Principles applicable to the protection of your personal data

The treatment of your personal data is carried out in accordance with the general principles described in Regulation (UE) No. 679/2016 - General Regulation on Data Protection, namely:

- In the context of the relationship established, ECO-OIL ensures that your personal data will be treated in a lawful, loyal and transparent (Principle of lawfulness, loyalty and transparency);
- ECO-OIL collects your personal data for specific, explicit and legitimate purposes and does not subsequently process the same data in a manner incompatible with those purposes (Principle of limitation of purposes);
- ECO-OIL ensures that only appropriate personal data will be processed, relevant and limited to what is strictly necessary for the purposes for which they are processed (Principle of data minimization);
- ECO-OIL takes appropriate measures so that inaccurate personal data, taking into account the purposes for which they are processed, are erased or rectified without delay (Principle of accuracy);



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- ECO-OIL keeps personal data in a way that allows their identification only for the period necessary for the purposes for which they are processed (Principle of conservation);
- ECO-OIL ensures that your personal data are treated in a way that guarantees your security, including protection against its unauthorized or unlawful treatment and against its loss, destruction or accidental damage, adopting technical or organizational measures (Principle of integrity and confidentiality).

3. Personal data, processing of personal data and data subject

Personal data are all information and / or elements that, regardless of their support, can identify or make you identifiable, directly or indirectly.

The treatment of personal data means the operation or set of operations carried out on personal data, automated or non-automated means, from the collection of information to its destruction. Within this cycle, among others, registration, organization, structuring, conservation, adaptation or alteration, recovery, consultation, use, dissemination by transmission, dissemination or any other form of availability, comparison or interconnection, limitation, erasure.

In the context of the activities developed by ECO-OIL, the data subject is, without limitation, the customer, potential customers, investors, partners, jobseekers, employees and ex-employees, employees of partners, suppliers and service providers and their employees, claimants and claimants, visitors and individuals captured in CCTV images and all those individuals maintain a relationship with ECO-OIL and to whom personal data relate

4. Category of Personal Data that ECO-OIL handles

In development of its activities, ECO-OIL processes the personal data of a significant number of categories of data subjects. The personal data collected always depends on the nature of the interaction, its legality underlying it and may include the following:

- a) Identification and contact details;
- b) Demographic data
- c) Commercial data for the provision of services and / or supply of products;
- d) Payment details;
- e) Account data;
- f) Preference data;
- g) Identification and contact data for access control and / or image capture and recording by CCTV devices;
- h) Data on the use of information technologies.

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It should be noted that the sharing of personal data with ECO-OIL is not mandatory, however and if that information is not shared, it may result in ECO-OIL being unable to supply the desired products and / or services, as well as ensuring the compliance with requirements that are necessary for the purposes of contractual relations

5. Purposes for the processing of personal data

The development and performance of the various activities pursued by ECO-OIL mean the existence of a relevant set of specific, explicit and legitimate purposes for the treatment of personal data, such as:

- a) Accounting, tax and administrative management;
- b) Management of the integrated quality, environment and safety and health at work system;
- c) Commercial and marketing activity;
- d) Capture and recording of images by CCTV devices;
- e) Access control management;
- f) Human resource management;
- g) Management of electronic communications;
- h) Analysis of statistical information;
- i) Litigation management;
- j) Compliance with legal and / or contractual obligations.

6. Lawfulness foundation

The lawfulness principle is underlying in all data processing operations carried out by ECO-OIL, which only proceeds to this processing as long as there is lawfulness grounds, namely:

- a) Consent;
- b) Pre-contractual diligence or the performance of a contract;
- c) Compliance with a legal obligation;
- d) Defense of vital interests of the data subject;
- e) Legitimate interests (provided that it does not prevail over the fundamental interests or rights and freedoms of the person and his data).

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7. Retention period of personal data

ECO-OIL keeps personal data only for the period of time necessary to carry out the specific purposes for which they were collected. However, it may be necessary to keep personal data for a longer period of time, taking into account factors such as:

- a) Legal obligations, under current laws, to keep personal data for a certain period;
- b) Contractual obligations and / or legitimate interest of ECO-OIL;
- c) Limitation periods, under the laws in force;
- d) Disputes (eventual);
- e) Guidelines issued by the competent data protection authorities.

8. Sharing of personal data

Personal data may be shared with:

- a) Companies and subcontractors responsible for providing services to ECO-OIL (these companies and subcontractors are bound in writing with the company ECO-OIL, only being able to process personal data for the purposes specifically established);
- b) Other responsible persons and / or third parties (other companies of the group to which the company ECO-OIL belongs, by means of a sharing agreement, the companies being responsible for complying with the data protection rules);
- c) Judicial, administrative, supervisory or regulatory authorities (based on due legality).

ECO-OIL ensures that personal data is not shared outside the European economic area.

9. Rights and their exercise

The holder of personal data has the right of access, rectification, limitation, portability, erasure and right to object to the processing of data, in certain circumstances, namely:

- a) Right to provide information - you have the right to obtain clear, transparent and easily understandable information about how ECO-OIL uses your personal data and what your rights are;
- b) Right of access - you have the right to obtain information about your personal data and the way they are treated;
- c) Right of rectification - has the right to request the correction of incomplete or incorrect personal data, and ECO-OIL should ensure its correction without undue delay;

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d) Right to erase data - you have the right to request the erasure or elimination of the personal data transmitted, as long as there are no valid grounds for ECO-OIL to continue using them or their use is illegal (example of exception: defense of a right in a judicial process);

e) Right to limitation of processing - has the right to block or prevent the future use of the personal data transmitted, while ECO-OIL evaluates a request for rectification or as an alternative to deletion;

f) Right to data portability - you have the right to obtain and reuse certain personal data for your own purposes in various organizations;

g) Right to opposition - you have the right to oppose certain types of treatment, for reasons related to your particular situation, at any time during which this treatment is taking place, for the purposes of the legitimate interest of ECO-OIL or third parties. However, ECO-OIL will be able to continue processing these data if it can prove the overriding legitimate reasons for the treatment, which override the right to opposition (example: establishment, exercise or defense of a right in a judicial process);

h) Right to file a complaint - you have the right to file a complaint with the competent supervisory authority, the National Data Protection Commission (CNPD), if you believe that the processing carried out violates your rights and / or data protection laws applicable.

You may at any time, in writing, exercise the rights enshrined in the Personal Data Protection Law and other applicable legislation through the email goncalo.camejo@eco-oil.pt.

10. The data protection officer

ECO-OIL appointed Gonçalo Refoios Camejo as the person responsible for the protection of personal data, who assumes a fundamental role within ECO-OIL, in monitoring the data processing activities carried out and in ensuring the respective legal compliance.

The data protection officer has the following functions:

a) Control the compliance of the treatments carried out by ECO-OIL with the provisions contained in the data protection laws in force and related to the matter of personal data protection in the European Union;

b) Provide advice to ECO-OIL;

c) Cooperate with national and European supervisory authorities in the field of personal data protection (in Portugal, the National Data Protection Commission);

d) Constitute a point of contact with the authorities and with the respective holders of personal data, in matters related to data protection.

The data protection officer can be contacted, at any time, about any data protection issues, via email goncalo.camejo@eco-oil.pt.

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11. Security of personal data

ECO-OIL processes personal data, in the context of the purposes identified in this policy and using appropriate technical and organizational measures to promote their security and integrity, namely in relation to unauthorized or unlawful processing of personal data and respective accidental loss, destruction or damage.

Without limiting, ECO-OIL makes use of logical and physical security requirements and measures to guarantee the protection of personal data, by preventing unauthorized access, ensuring the storage of information on protected media and locations

12. Confidentiality

ECO-OIL assumes that it does not sell, rent, distribute, or commercially or otherwise make personal data available to any third party, except in cases where it needs to share information for the purposes set out in this policy. ECO-OIL preserves the confidentiality and integrity of personal data and protects them in accordance with this policy and the laws in force on the subject.

13. Other relevant documentation

ECO-OIL can assume internally documented support procedures for operational control activities that are directly related to this policy.

14. Changes to this policy

ECO-OIL may change this policy from time to time. When doing so, it will publish it on its official website and / or make it available to all parties interested in protecting personal data.

If the changes result in changes to relevant procedures, with effects on the protection of data already collected, ECO-OIL will take specific actions to ensure that the holders of such data are informed of these changes and the subsequent effects

A ECO-OIL pode assumir internamente procedimentos documentados de suporte, para as atividades de controlo operacional que estejam diretamente relacionadas com a presente política.

November 15th, 2019

The CEO

