

PRIVACY POLICY

Hydracooling, Ltd, values its relationship with its Customers, Suppliers, Employees and Partners, and has made the best efforts to implement technical and organizational measures to guarantee its privacy and respect for its rights and freedoms in what concerns the processing of personal data.

This Privacy Policy aims to inform you how **Hydracooling, Ltd** treats your Personal Data and guarantees its privacy, security and integrity in the development and execution of its activities.

- 1-Responsible for the treatment of your Personal Data
- 2-Principles applicable to the treatment of your Personal Data
- 3-Personal Data, Treatment of Personal Data and Data Subject
- 4-Personal Data Category that Hydracooling, Ltd treats
- 5-Purposes of treatment of your Personal Data
- 6-Fundamentals of Lawfulness
- 7- Deadlines for storage of your Personal Data
- 8-Sharing your Personal Information
- 9-Recruitment and Selection
- 10-Rights and Exercise of Rights
- 11-Liability of the data subject
- 12-Safety and Integrity
- 13-Violation of Personal Data
- 14-Confidentiality
- 15-Cookies
- 16-Analysis of the website and its users
- 17-Personal data of Minors
- 18-Security measures and procedures
- 19-Electronic Communications
- 20-Unsubscribe Electronic Communications
- 21-Changes to this Privacy Policy



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1. Responsible for the treatment of your Personal Data

Responsible for the Treatment of your Personal Data is **Hydracooling, Ltd**, which provides services and/or products to you, determining for this purpose and without limiting:

- Personal Data that must be processed in the context of the provision of services and/or supply of products;
- The Purposes for which Personal Data is processed; and,
- The means to be applied for the processing of the Personal Data.

You may clarify any questions or obtain additional information about this Privacy Policy and the Treatment of Personal Data, simply by sending your questions or complaints by letter to:

Hydracooling, Lda

A/c Responsible for Privacy

Guimarães Industrial Park, 1st Phase, Pavilion G15

4805-661 Guimarães

Or to the e-mail address: rgpd@hydracooling.pt.

2. Principles applicable to the treatment of your Personal Data

The Treatment of your Personal Data is carried out in accordance with the general principles set out in the General Regulation on Data Protection and other data protection legislation, namely:

In the context of the relationship with you, **Hydracooling, Ltd** ensures that your Personal Data will be treated in a legal, fair and transparent manner ("Principle of lawfulness, loyalty and transparency");

Hydracooling, Ltd collects your Personal Data for specific, explicit and legitimate purposes and does not subsequently treat the same Data in a way that is incompatible with those purposes ("purpose limitation principle");

Hydracooling, Ltd ensures that only appropriate, relevant and limited Personal Data are treated as strictly necessary for the purposes for which they are processed ("data minimisation principle");

Hydracooling, Ltd adopts the appropriate measures so that qualified the inaccurate Personal Data, taking into account the purposes of treatment, are erased or rectified without delay ("Principle of Accuracy");

Hydracooling, Ltd retains Personal Data in a form that allows its identification only for the period necessary for the purposes for which it is treated ("Conservation Principle");

Hydracooling, Ltd ensures that your Personal Data is treated in a way that guarantees its security, including protection against its unauthorized or unlawful treatment and against its accidental loss, destruction or damage, adopting the appropriate technical or organizational measures ("Principle of integrity and confidentiality").



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3. Personal Data, Treatment of Personal Data and Data Subject

Personal Data - are all information and/or elements that, regardless of their support, can identify or make directly or indirectly identifiable to **Hydracooling, Ltd**, in particular by reference to an identifier, such as the name, identification number, their location data and/or identifiers by electronic means or to one or more specific elements of their physical, physiological, genetic, mental, economic, cultural or social identity.

Treatment of Personal Data- means the operation or set of operations carried out on Personal Data of Data Subjects, through automated or non-automated means, from the collection of the information to its destruction. This cycle, among others, includes the registration, organization, structuring, conservation, adaptation or alteration, retrieval, consultation, use, dissemination by transmission, dissemination or any other form of comparison or interconnection, limitation or erasure.

In the context of the activities developed by **Hydracooling, Ltd**, the "**Data Subject**" concept may include, without limitation: current, past and future associates, associate employees, partners, job applicants, employees and former employees, suppliers and service providers and their employees, claimants and claimants, visitors and all those individuals who have a relationship with **Hydracooling, Ltd** and to whom the Personal Data relates.

4. Personal Data Category that Hydracooling, Ltd treats

In the development of its activities, **Hydracooling, Ltd** treats Personal Data of a significant set of categories of Data Subjects.

The Personal Data that **Hydracooling, Ltd** collects always depends on the nature of the interaction, but may include the following:

Data Categories:

- ✓ Personal contact details

- ✓ Commercial data for the provision of services and/or supply of products

- ✓ Data of payment

- ✓ Data of account

- ✓ Data of the security credentials

- ✓ Data of the Preferences

- ✓ Data of the use of information technologies

The information collected about you and your purchases will be used, only and exclusively by **Hydracooling, Ltd**. This ensures that this information will not be used or shared to third parties for promotional purposes via email or telephone.

We emphasize/note that you will not be obliged to share your Personal Data with **Hydracooling, Ltd**. However, in the event that you decide not to share your personal information, in some cases, **Hydracooling, Ltd** may not be able to provide the services or provide the products you want, to ensure certain specialized features or to respond effectively to any question you may have.

5. Purposes of processing your Personal Data

In general, the personal data collected is used to manage the contractual relationship, recruitment and selection, provision of services or products requested, the answer of doubts and needs of the user, information actions, marketing and inclusion of the user in the lists of subscribers. You may, however, make personal data available to us for other purposes, for the purposes of sending complaints and suggestions, disseminating institutional information and/or publicizing campaigns, promotions, publicity and news about **Hydracooling, Ltd** products and/or services. When collecting the data you will be given more detailed information on how we will use your data.

The data collected are essential to answer questions and requests for quotes, suggestions or complaints from the user, may also be intended for the billing of products or services awarded and marketing actions of **Hydracooling, Ltd**.

The development and execution of the activities by **Hydracooling, Ltd** means the existence of a set of specific, explicit and legitimate purposes for the treatment of your Personal Data, such as:

Purposes of Processing:

Purposes	Examples (not exhaustive)
Accounting, tax management and administration	Accounting; Billing; Management of commissions; Tax information (including sending information to the tax authority).



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Commercial and Marketing activity	Marketing or selling new products or services; Adaptation and development of new products or services.
Definition and analysis of profiles	Analysis of consumption profiles
Client management and Service Delivery	Contact management, information or requests; Management of complaints; Billing management, billing and payments; Consumer analysis
Litigation Management	Judicial and extrajudicial recovery; Management of other conflicts
Access control management	Managing access logs; Backups management; Security incident management
Fulfilment of legal obligations	Judicial orders of interception of communications; Investigation, detection and prosecution of serious crimes; Response to judicial bodies of regulation and supervision
Human resource management	Payroll processing; Contract of employment
Electronic Communications Management	Requests for information; Proposed order; Questions about products or services
Detection of fraud, revenue protection and audit	Detection of fraud and malpractices; Control and protection of revenue; Credit risk management; Auditing and internal investigations

6. Fundamentals of Lawfulness

By reference to the “principle of Lawfulness” consecrated in the current data protection laws, in the development and implementation of its activities, the **Hydracooling, Ltd** treats your personal data only when there is a foundation of lawfulness that legitimize the treatment, specifically:

Consent: the **Hydracooling, Ltd** will treat your personal data only if you consent in respective treatment through a manifestation of will, given specific, informed and explicit, by which accepts, upon declaration (in writing or orally) or positive unequivocal Act (by filling an option), that your personal data will be object of treatment.

Pre-contractual proceedings or the performance of a contract: the **Hydracooling, Ltd** may treat their personal data if they are needed, without limit, for the performance of a contract of service providers and/or products in which it is part as collaborator, customer and/or supplier, or to log your request to pre-contractual proceedings.

Compliance with a legal obligation: the **Hydracooling, Ltd** may treat your personal information in order to ensure and guarantee compliance with legal obligations to which is subject to the satisfaction of the legislation of a Member State and/or the European Union.

Defense of the vital interests of the data subject the *Hydracooling, Ltd* may treat your personal information in order to ensure the protection of its vital interests, particularly when the same treatment is essential to your life.

Legitimate interests: the *Hydracooling, Ltd*, other responsible or third parties may treat your personal information while on this treatment doesn't prevail the interests or rights and fundamental freedoms of the data subject.

7. Deadlines for storage of your Personal Data

The *Hydracooling, Ltd* retains your personal information only for the period of time required to implement the specific purposes for which it was collected. However, the *Hydracooling, Ltd* can be forced to keep some personal data for a longer period of time, taking into account factors such as:

- ✓ Legal obligations, under the laws in force, to retain personal data for a certain period;
- ✓ Limitation periods under the laws in force;
- ✓ (any) Disputes; and,
- ✓ Guidelines issued by the competent data protection authorities.

During the processing of your personal data, *Hydracooling, Ltd* ensures that they are treated in accordance with this policy of privacy and data protection. Once your data is no longer needed, the *Hydracooling, Ltd* will, safely and on a permanent basis, eliminate it.

8. Sharing of your personal information

The *Hydracooling, Ltd*, as part of its activity, can share your data with third parties, however, just will do it in terms of this section of the privacy policy.

Subcontractors: Your personal information may be shared with service providers to *Hydracooling, Ltd*. The contractors are bound to *Hydracooling, Ltd* by a written contract, only being able to treat your personal data for the purposes specifically set out and are not authorized to treat your personal information, directly or indirectly, for any other purpose, advantage or of a third parties.

Other Responsible and/or third parties: Your personal information may be shared internally with other entities associated with the *Hydracooling, Ltd* that will comply with the data protection rules applicable in accordance with the attached to the treatment purposes.

To your request and/or with your consent, your personal information may be shared with other entities.

In fulfillment of legal obligations and/or contractual, personal data may also be transmitted to the judicial authorities, administrative, or regulatory supervision and the entities that carry out lawfully, compiling data, actions preventing and combating fraud, market research or statistical.

9. Recruitment and selection

Accepted that the Responsible for the recruitment and selection:

I) Treat and use my personal data under the terms and conditions below.

1) the **Hydracooling, Ltd**, company with headquarters in the Industrial Park of Guimarães, 1st phase, G15 -661 .4805 Guimarães Pavilion, with the Tax Identification Number 509 062 733, (hereinafter referred to as data manager) will treat your personal data contained in the application and Curriculum Vitae delivered in person at the premises of **Hydracooling, Ltd** and by handling in the application submission through the site.

2) the personal data contained in the application and Curriculum Vitae, as well as all personal data which spontaneously decides to transmit to the data manager, including but without limitation, the name, age, gender, photograph, contact details (email address and telephone number), information about education, employment history [hereinafter "personal data"] will be included in automated files, or in a manual file, of personal data by the data manager.

3) Personal data shall be processed for the following purposes:

- a) the storage and updating when necessary on the basis of personal data, so that the data manager can contact you in relation to the recruitment process;
- b) rating of your personal data for the vacancy to which your application submitted, as well as in relation to other spaces than the data manager understands can be suitable for you;
- c) verification of the personal data provided, using third-party resources (such as psychometric assessments or tests of competence) or to request information (such as references, qualifications).

4) The data manager is committed to ensuring the confidentiality of such personal data, as well as ensure your use exclusively for the purposes mentioned in the preceding paragraph.

5) Personal data will be kept only for the period necessary for the purposes for which they are treated. The data manager will delete your personal information if it has not been established any relevant contact with you in a period of two years. To this effect, it is considered relevant contact submit your updated resume for the human resources of the data manager, as well as any communication about your potential functions, both for verbal communication as written.



HYDRACOOILING

To your reception, opening or reading an email or other digital message sent by the data manager would not count as relevant contact - only occurs in cases where you click or reply directly.

6) Expressly declares that the personal data provided to the data manager are accurate and that will be updated whenever necessary.

7) May exercise the right of access, rectification and/or erasure of your personal data and/or of written opposition, through the electronic address rgpd@hydracooling.pt .

8) Also in writing, by sending email to the email address identified above, may apply to the data manager to limit or opposition to the processing of their personal data, as well as exercising your right to data portability of the personal data.

9) If it considers that the processing of personal data carried out by the data manager violates the personal data protection legislation in force in Portugal, has the right to complain to a supervisory authority, in particular to the National Commission of data protection.

10) In the case, on grounds relating to the treatment of your personal data, you need to communicate with the contact person of the data manager, you will be able to contact you via the email address rgpd@hydracooling.pt .

11) In addition, the data manager may have to communicate with individuals or organizations having information related to your reference or with your application, as, for example, current, previous and prospective employers, educators and assessment bodies, employment agencies and recruitment.

12) The data manager may subcontract third parties service providers who perform functions on its behalf (including external consultants, business partners and professional advisors such as lawyers, auditors and accountants, technical support functions and third party providers of computer services).

10. Rights and exercise of rights

As holder of the personal data processed by **Hydracooling, Ltd**, has the right of access, rectification, limitation, portability, deletion, and the right to object to the processing of personal data, in particular circumstances, which may be exercised in accordance with this chapter of the privacy policy:



HYDRACOOILING

Right to the provision of information: As the data subject has the right to obtain clear information, transparent and easy to understand about how the *Hydracooling, Ltd* uses your personal data and your rights.

Right of access: As the data subject has the right to obtain information about the personal data that the *Hydracooling, Ltd* treats (if effectively treats it) and certain information about how this data is handled. This right allows you to have knowledge and confirm that we use your data in accordance with data protection laws. The *Hydracooling, Ltd* can, however, refuse to provide the information requested where, to do so, has to reveal personal information of another person or the requested information harm the rights of another person.

Right of rectification: As the data subject has the right to request the *Hydracooling, Ltd* taking reasonable steps to correct the personal data that are incorrect or incomplete.

Right to erasure of data: This right is also known as the "right to be forgotten", simply, allows you on the quality of the data subject request deletion or erasure of your data, since there are no valid grounds for the *Hydracooling, Ltd* will continue to use them or, when, your use is unlawful.

Right to limitation of treatment: As a data subject, you have the right to "lock" or prevent the future use of your data while *Hydracooling, Ltd* evaluates a request for rectification or as an alternative to deletion.

Right to data portability: As the data subject has the right to obtain and re-use personal data for their own purposes. This right applies only to the data that you have supplied to *Hydracooling, Ltd* and that the *Hydracooling, Ltd* treats with your consent and those that are processed by automated means.

Right of opposition: Has the right to object to certain types of treatment, for reasons related to your particular situation, at any time in consequence of this treatment.

Right to lodge a complaint: Has the right to submit a complaint to the competent control authority, the National Commission of Data Protection – CNPD if it considers that the treatment personal data violates their rights and/or the applicable data protection laws.

You can at any time, in writing, to exercise the rights enshrined in the Personal Data Protection Act and other applicable legislation via email: rgpd@hydracooling.pt.

11. Liability of the data subject



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The data subjects are responsible for providing reliable information to the **Hydracooling, Ltd.**

12. Safety and integrity

Your personal data will be processed by **Hydracooling, Ltd**, only in the context of the purposes identified in this policy, in accordance with the internal policies of **Hydracooling, Ltd** and with technical and organizational measures designed according to the risks associated with the specific processing of personal data. Technical and organizational measures designed ensure, to the maximum extent possible, the security and integrity of personal data, in particular in relation to the unauthorized or unlawful processing of your personal data and its loss, destruction or accidental damage.

The **Hydracooling, Ltd**, however, cannot guarantee the security of data when transmitted over open network, in so far as the transmission of information over the Internet isn't absolutely safe.

13. Violation of Personal Data

In the event that there is an infringement of personal data which is likely to involve a risk to the fundamental rights and liberties of citizens, **Hydracooling, Ltd** shall notify the supervisory authority jurisdiction as soon as possible, which can never exceed the time limit of 72 (seventy two) hours after obtaining knowledge of it.

If the violation involves a high risk to the fundamental rights and liberties of citizens, **Hydracooling, Lda** shall communicate the personal data breach to the respective holder of the data, without undue delay.

14. Confidentiality

The **Hydracooling Ltd** acknowledges that the information provides could be of a confidential nature. As part of its activity to **Hydracooling, Ltd** does not sell, rent, distribute, or commercialize or otherwise provides personal data to any third party, except in cases where need to share information with service providers for the purposes set out in this privacy policy or to third parties for the purpose of fulfilling their legal obligations. The **Hydracooling, Ltd** preserves the confidentiality and integrity of their data and protect them in accordance with this policy and privacy and all the laws in force.

15. Cookies

The **Hydracooling, Ltd** uses Cookies to collect information about the use of its internet pages. Whenever you visit one of our websites, **Hydracooling, Ltd** treats your personal information collected through the use of Cookies in accordance with the policy on cookies published. For more information about the use of Cookies, we recommend reading and analysis of the policy of Cookies and regular query to check the most up-to-date versions.

See the privacy policy of third parties:



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› Facebook

› Google

› YouTube

› Instagram

› LinkedIn

16. Analysis of the website and its users

On our website we use Google Analytics, a Web analysis service of Google (Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States) that lets us understand the actions that users can perform on the website. You can disable the use of cookies in the settings/options of your internet browser.

17. Personal data of minors

Our products are intended for adults (over 18 years) or with express permission of adults (over 13 years).

18. Security measures and procedures

The **Hydracooling, Ltd** comply with the best practices in the field of security and protection of information and personal data, has implemented logical measures, with the use of firewalls and intrusion, organizational systems and appropriate necessary security and sufficient to protect your personal data against destruction, loss, alteration, unauthorized disclosure or access as any other accidental or unlawful forms of processing.

19. Electronic Communications

The user can receive 2 types of information from **Hydracooling, Ltd**:

› Information and response related to requests for information or quotes of products of **Hydracooling, Ltd**. The user can receive e-mail clarification to the questions, sales proposals, confirmation and update of an order, payments of the order, order shipping, thanks for the order and the terms of payment;

› Periodic Information about the website, products, news, promotions and campaigns of **Hydracooling, Ltd** requiring the subscription by the user.

20. Unsubscribe Electronic Communications

The newsletter service is continuous, with no established term and can be cancelled at any time by the user. To this end, the user has to do a written request through the email address. If the user has problems with the functionality to remove your subscription, please send an email to rgpd@hydracooling.pt with the request to cancel this service.



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21. Changes to this Privacy Policy

The ***Hydracooling, Ltd*** will update this privacy policy periodically. Whenever it's done, the new version will be published on the internet page and enter into force immediately, so we advise you to consult it regularly. The user can check the date at the end of this policy to check the date of your last review.

Date of last update: The following information has been updated on day 20 June 2018.