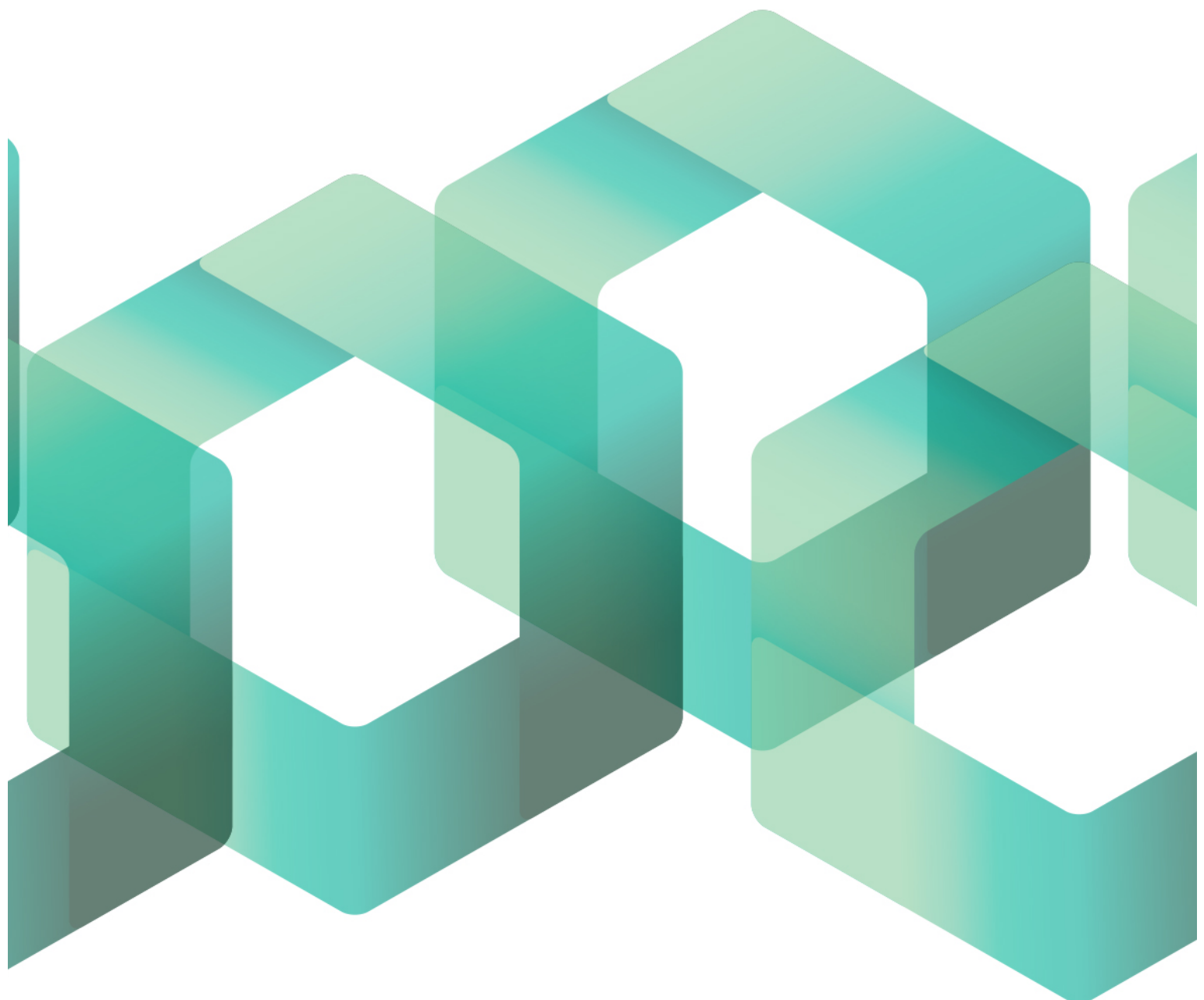




RACE

Refrigeration & Air Conditioning Engineering



RACE S.A.
Privacy Policy

This Privacy Policy establishes the commitment of RACE - Refrigeration & Air Conditioning Engineering, S.A. (hereinafter RACE) with its stakeholders (e.g. customers, employees, suppliers) in the protection of the personal data for which it is responsible, with a view to contribute to strengthen and consolidate the relationship of trust and proximity it has with them, through the clear and transparent communication of what it does with such data, of the rights it recognises to the relevant data subjects and of how they can exercise such rights.

RACE fully complies with the principles described in this policy, in the Regulation (UE) 2016/679 (General Data Protection Regulation) and in the applicable data protection legislation, in all personal data processing activities it is responsible for.

The Privacy Policy forms part of the legal framework of RACE for personal data protection, which includes rules and procedures for the management of the security and privacy of the personal data.

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

a. Purposes

The Privacy Policy, as a communication tool, has as main purposes:

- To strengthen and consolidate a relationship of trust and proximity of RACE with all its stakeholders;
- To demonstrate transparency in relation to the purposes and the activities of processing carried out by RACE, as well as in relation with the storage periods of the relevant personal data;
- To inform the data subjects of their rights in relation to the personal data protection and of the way they can exercise such rights;
- To inform the data subject of who are the persons at RACE who can be contacted for them to exercise their rights or to obtain clarification on how their personal data are processed.

b. Scope of Application

The Privacy Policy applies exclusively to the processing of personal data by RACE, in the context of the purposes established. For the purposes of this policy, personal data is any information concerning any identified or identifiable natural person (data subject). An identifiable data subject is one who can be identified, directly or indirectly, in particular by an identification number or specific characteristics of his/her physical, physiological, genetic, mental, economic, cultural or social identity.

c. Maintenance, Communication and Application of the Policy

The Privacy Policy shall be reviewed every year by the Management Board, when there is a change of circumstances and when there are legislative changes, in order to confirm that it remains updated and adequate vis-à-vis the applicable regulations and laws. The proposals for the review of the policy and the supervision of its application and fulfilment are the responsibility of the Management Board.

This policy shall be informed to all employees of RACE and must be provided to the stakeholders, whenever the processing of their personal data is at stake, through the adequate channels, in particular Internet (websites, Apps) and services of support to the customer (contact centres and physical locations).

1. Contents of the Privacy Policy

a. Our Privacy Commitment

RACE operates on the basis of trust and transparency. This commitment is reflected in the daily relationship with our customers, employees and suppliers. The privacy and security of the data you entrust us with are a priority to us.

It is our commitment to only collect, store, process, transmit or delete your personal data with transparency and to the extent necessary to provide you the best services. We will inform you of the way how we use your personal data and for what purposes, with the guarantee that we collect, share and store your personal data having as reference the 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 are safe with us, as we will always be committed to protect their privacy, and we assume with great seriousness and determination our responsibilities as regards the protection of your personal data.

Whenever you have a question regarding the use we make of your personal data, we are available to help, so please contact us at:

e-mail: rgpd@race.com.pt; address: Rua Monte of the Pupos Armazém 7, 4460-059 Guifões Matosinhos; telephone +351 229 571 160 and Fax +351 229 537 608

b. Who is the Controller of your Personal Data?

RACE is the controller of your personal data in accordance with the General Data Protection Regulation and the complementary legislation on personal data protection in force in the countries where it operates.

RACE forms part of a Group of Companies (Sonae Capital Group) and therefore your personal data can be transmitted to and processed by any of the companies belonging to this Group.

c. Personal Data that We Can Collect

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

We can also receive your personal data from other companies, in particular when such companies collect, process or store them within the scope of a service contract.

RACE can collect the following categories of personal data:

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

d. How and Why We Use Your Personal Data

We use your personal data with the following purposes:

- i. Transaction management – for the issuance of invoices concerning the purchase 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-sale support – to allow you to access the repair service for the products purchased with warranty and for us to be able to repair them;
- v. Service management – for us to be able to provide you the service contracted.

e. For How Long Do We Store Your Personal Data?

We store your personal data only for the period which is necessary to meet the objectives defined in sub-paragraph d) above and to comply with the law.

Once storage period has elapsed, your personal data will be anonymised or destroyed/deleted in a secure manner.

f. With Whom Can We Share Your Personal Data?

In some cases, we can disclose your personal data to other entities, in connection with services provided by them. In those cases, we require that they have in force the security measures adequate to protect your personal data.

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

Where required by law, we may need to disclose your personal data to certain authorities or third parties, and in these cases, we have a limited control over the way how your personal data is protected.

In case of transfer or access to your personal data by a company of our Group (Sonae Capital), suppliers or service providers based outside the European Union, we guarantee that your personal data is processed in accordance with security and protection measures which are appropriate and compatible with those used by us.

g. How Can You Exercise your Personal Data Protection Rights?

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

- i. Additional information on the use that we make of your personal data;
- ii. Your personal data;
- iii. To transmit the personal data provided by you to another entity;
- iv. The update of your personal data;
- v. The deletion of your personal data;
- vi. The opposition to the processing of your personal data;
- vii. The limitation of the way how we use your personal data while we correct it or clarify any doubts about its contents or about the use we make of it;
- viii. The provision of a channel where you can challenge decisions based on your personal data.

You also have the right to withdraw or change, at any moment, your consent for us to use your personal data.

By way of exception, you cannot exercise these rights when your personal data is used for the safeguard of the public interest, in particular in cases of crime detection and prevention de crimes, or when the data is subject to professional secrecy.

To exercise your rights of personal data protection or if you have any question about the use that we make of your personal data, please contact us using the contact details referred to in point 1 above.

If you are dissatisfied with the way how we use your personal data or with our response to your request to exercise your rights, you can submit a complaint to the National Commission of Data Protection (*Comissão Nacional de Proteção de Dados, CNPD*) – Address: Rua de São Bento, 148 – 3º, 1200-821 Lisboa – Telephone: +351213928400 – Fax: +351213976832 – E-mail address: geral@cnpd.pt.

h. Cookies

RACE uses cookies on its Websites, which allow to improve the performance and the navigation experience of our users, increasing, on one hand, the speed and efficiency of the response and, on the other hand, eliminating the need to repeatedly introduce the same information.

The use of cookies does not only help the Websites to recognise the user’s device the next time he/she visit us, but is also essential for their proper functioning. The cookies used by RACE on all its Websites do not collect personal information allowing to identify the user, and store only generic information, such as the form and/or the place of access and the way the user uses the Websites. The cookies only retain information related with the preferences of the User.

Google Analytics	Google application that allows the website Race.com.pt to store the user’s navigation data.
Own	Confirmation that the forms were sent from the own page, and not from spam systems.
Own	Aimed at maintaining the active session of the Backoffice
Own	Allows the information pop-up on the cookies to no longer be visualised after acceptance of the terms and conditions

i. How We Protect your Personal Data

We have a variety of information security measures, in line with national and international best practices, in order to protect your personal data, including technological controls, administrative, technical and physical measures and procedures, which guarantee the protection of your personal data, preventing improper use, non-authorized access and disclosure, loss, improper or unintentional modification, or non-authorized destruction. We assume, in terms of information security, the same commitment to continuous improvement that we assume in our daily activity.

We point out the following measures:

- i. Access to personal data restricted to those who need it to meet the above-mentioned objectives;
- ii. Storage and transfer of personal data only in a secure manner;
- iii. Protection of the information systems using devices preventing non-authorized access to your personal data;
- iv. Implementation of mechanisms guaranteeing the safeguard of the integrity and quality of your personal data;
- v. Permanent monitoring of the information systems, with the purposes of preventing, detecting and deterring the improper use of your personal data;
- vi. Redundancy of equipment of storage, processing and communication of personal data, to avoid loss of availability.

Where required by law, we may need to disclose your personal data to certain authorities or third parties, and in these cases, we have a limited control over the way how your personal data is protected.

j. Updates to This Privacy Policy

This Privacy Policy can be updated from time to time, and updates will be announced through the link <http://www.race.com.pt/docs/politica-privacidade-race-maio-2018-EN.pdf>