

# PRIVACY POLICY

The present information aims to establish the rules of guarantee of privacy of all the personal data received and retained by ACN following the admission of its employees, trainees, service providers and all kind of collaborators and partners, clients, potential clients and suppliers, and to facilitate a guiding framework of action that allows, on the one hand refer to the implemented control and guarantee mechanisms and, on the other hand, inform the rights of the interested parties, in order to promote the total compliance with applicable legislation.

ACN is a company, autonomous legal, in which their Vision, Mission, Values and Quality and Privacy Policies, are common.

The Privacy Policy is a public statement, shared through all available communication supports.

Where the holder makes available its personal data, aiming to apply to a job vacancy, maintain active and available its application for future vacancies and professional situations, being accepted, be allocated to projects in progress, in a specified time, participate or integrate other projects, traineeships or training, ACN is committed to protect those.

The Privacy Policy applies to the information obtained through the follow manners:

- Institutional website of ACN;
- Job ads or spontaneous applications;
- Social media (Facebook, LinkedIn, Youtube, Instagram);
- Applies also to all information that you share with us personally, by telephone, SMS, email, letter or any other kind of correspondence.~

## **01. Use of personal data**

In a policy of ethics and rigour, ACN stand by total respect and reserve of the accessed information, either it is personal data, strategic information, financial or other, which our interlocutors shared with us, considering the establishment of a contractual link, the provision of a service or the participation on projects, training of any kind or nature and a on a basis of mutual trust.

The Privacy Policy establishes:

- Which information do we obtain and for which purposes?
- To whom we share the data with?
- For how long do we maintain the information?
- Which is the basis of the personal data?
- Which are the rights of those in respect to its obtained data?

To obtain additional information or to clarify about our Privacy Policy and Personal Data Processing, the questions must be sent through the follow manners:

- Email: [info@acncutting.com](mailto:info@acncutting.com)
- Postal mail: ACN - CUTTING SYSTEMS, Lda | Rua Tomé de Barros Queirós, n.º 135 | 3830-252 Ílhavo, Portugal
- Telephone: +351 234 320 900

## **02. Which information do we obtain and for which purposes?**

We do obtain only the information necessary for the commercial contact with the clients, potential clients and suppliers, as well as the ones needed for a admission or to a recruitment project or traineeship or training (data such as previous professional experience, education and matters respecting the open vacancies) and we don't maintain those for longer time than the strictly necessary.

## **03. To whom we share the data with?**

The data are received, mostly due to job applications or traineeships and/or spontaneous applications, of the commercial contact with clients, potential clients and the contact established with suppliers.

The automatic mechanisms of preservation and control, backup copies daily generated, the retention of information on save external servers, features the guarantee of the safety, and the strict and necessary use of the personal data trusted to us.

In principle, the personal data cannot be transmitted. If there is a need to, for example, because of some subcontractor demand, ACN will take the necessary contractual measures to guarantee that those entities respect and protect the personal data. Those data can be transmitted to third parties - distinct entities from ACN or its subcontractors, which are example, companies with whom ACN develop partnerships. In these situations, it will be always necessary a consent. Those data also can be transmitted to entities to whom those were communicated by force of law, as such as the tax authority due to contracting situations.

## **04. Periods of retention of information**

After consent, the personal data are retained during the period strictly necessary. If the holder exercises the Right of Forgetting in respect to data which have legal obligation of storage, all and any use of data will be

suspended, but we just can delete those once it is fulfilled the legal deadline of the retention of them.

If an individual becomes a employee of ACN, all its data will be retained in the employee file until the termination of employment contract, to which are added 12 years for the compliance of the legal obligations.

## **05. On what basis do we process the personal data?**

- Legitimate interest: When the data processing correspond to a legitimate interest by ACN.
- Consent: Imply the free and enlightened express previous consent - in writing or through a validation on a digital option.
- Execution of the contract and pre-contractual diligences: When the personal data processing may be necessary to the signature, execution and management of contracts signed with ACN.
- Compliance of legal obligations: When the personal data may be necessary to fulfill a legal obligation that ACN is subject. When the personal data be necessary to fulfill a legal obligation that ACN is subject. Upon this framework are example the compliance of fiscal obligations or a response to a judicial request.

## **06. The rights of the holders of the data**

The holder of the personal data has the Right to Access, Correction, Deletion, Restriction, Objection and Portability of Data. To guarantee the safety in the process, it is demanded the proof of identity to assure the confidentiality.

### Right of Access, Correction and Deletion

The holder of the data can, at any moment, access to the data that facilitated us, request the correction or the change, whenever justified, given that we commit to follow up within a maximum period of 30 days. The Right to Deletion it is equally recognised, wherefore the personal data are deleted, in the period referred above, counting from the date of the request, as long as there aren't valid reasons for the conservation, as for example in the cases in which ACN has to conserve the data to fulfil a legal obligation.

### Right to Restriction and Objection

When we referred the need to obtain the interest of the holder in respect to a given project, we are assuring the Right to Restriction and Objection in the use of data and other personal information in possession of ACN, maintaining them, however, active for other cases, following the same obligation of measurement of interest.

## Portability of Personal Data

The holder is given the right to request to ACN to send the personal data to another organization, without appreciable costs, unless if the information, given its extent and complexity, imply the use of measures which charges be significant.

Is is for the Portuguese National Authority, the National Commission for Data Protection (CNPD) (<https://www.cnpd.pt/>), to receive the claims of the holders of personal data.

If you want to exercise your rights, you may do it through the follow manners:

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