

PRIVACY POLICY OF COME16.ES WEBSITE

1. IDENTIFICATION OF THE CONTROLLER

- Company: **MEXTO PORTUGAL, S.A.**
- Registered Office: Avenida António Augusto Aguiar, n.º 27, 1.ºD, 1050-012 Lisboa
- Tax Registration Number (NIPC): 514 643 730
- Telephone: [+351 213 461 050]
- E-mail: [info@mexto.pt]

2. INFORMATION AND CONSENT

The Portuguese Data Protection Law, "*Lei da Proteção de Dados Pessoais*" (hereinafter, "LPDP") and the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th of April 2016, hereinafter "GDPR") shall ensure the protection of natural persons with regard to the processing of personal data and the free movement of such data.

According to the Law, personal data refers to any "information relating to an identified or identifiable natural person, "the data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person."

The personal data provided through the website are to be included in a file under the responsibility of **MEXTO**, whose protection of personal data complies with the appropriate technical and organizational security measures.

MEXTO maintains a database with the registration of its clients composed only of the personal data provided by the data subjects at the time of registration, which are collected and processed automatically by **MEXTO**, the entity responsible for the processing of the personal data (“Controller”).

In no case shall personal data on racial or ethnic origin, political opinions, religious or philosophical beliefs, political opinions, trade union membership, data on health, genetic data, biometrics or data relating to sexual life or sexual orientation be solicited.

In no case shall **MEXTO** carry out any of the following activities with the personal data provided through this site, without the express prior consent of the data subject:

- Provide the data to other people or other entities;
- Transfer the data outside the European Economic Area (EEA).

3. PURPOSES OF THE PROCESSING OF PERSONAL DATA

The personal data processed through this page will only be used for the following purposes:

- i. Communication and clarification;
- ii. Processing of Information requests;
- iii. Processing of complaints;
- iv. Verify, maintenance and development of systems and analytic statistics;
- v. Marketing, in case prior consent was given.

MEXTO guarantees the confidentiality of all data provided. Although **MEXTO** collects and processes data in a secure manner and prevents its loss or manipulation using the most appropriate techniques, it should be borne in mind that the collection of data in open networks allows personal data to be circulated without safety conditions, with the risk of being seen and used by unauthorized third parties.

Failure to respond to data marked as mandatory, implies the inability to respond to the request of the data subject.

The legal basis for the processing of user's personal data for the referred purposes, for each case, are the consent given by the user, for the performance of a contract to which the user is party, for compliance with a legal obligation or the purposes of the legitimate interests of **MEXTO**.

The personal that will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed, for compliance with legal storing obligation deadlines and until the extinction of **MEXTO'S** liabilities.

4. SECURITY MEASURES

MEXTO states that it has implemented and will continue to implement the security measures of a technical and organizational nature necessary to guarantee the security of the personal data provided to it, in order to prevent its alteration, loss, unauthorized treatment and/or access, taking into account the current state of the technology, the nature of the data stored and the risks to which it is exposed.

MEXTO guarantees the confidentiality of the data provided through this website. The collection and processing of data takes place safely and prevents its loss or manipulation. All data is inserted on a secure server (256-bit SSL) that encrypts/encodes (transforms into a code). You can verify that your browser is safe if the padlock symbol appears or if the address starts with HTTPS instead of HTTP.

The personal data is treated with the level of protection legally required to guarantee the security of the same, as well as prevent unauthorized alteration, loss, unauthorized processing, considering the state of the technology, being

the user aware and accepting that the security measures of Internet are not impregnable.

Whenever **MEXTO** accesses personal data, it undertakes to:

- Store the data by means of legally enforceable security measures of a technical and organizational nature that guarantee their security, thus avoiding unauthorized alteration, loss, processing or access, according to the current state of technology, the nature of the data and the possible risks to which they are exposed;
- Use the data exclusively for the purposes which were previously defined;
- Make sure that the data is handled only by the employees whose intervention is necessary to satisfy the request of the data subject, being the same obliged to the duty of secrecy and confidentiality. Should the information be disclosed to third parties for said purposes, they should be required to keep the confidentiality in accordance with what is envisioned in this document.

5. EXERCISE OF THE RIGHTS OF THE DATA SUBJECT

In accordance with the provisions of the Law number 58/2019, of 8th august and the RGPD, the user may exercise at any time his/her right to information, access, rectification, erasure, limitation, portability, opposition and the right to withdraw the consent at any time, being that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal, by means of a written request addressed to **MEXTO**, through the following means:

- Through mail to the following address: Avenida António Augusto Aguiar, number 27, 1.ºD, 1050-012 Lisboa
- Through e-mail to the following address: [info@mexto.pt]

6. SUPERVISORY AUTHORITY

In accordance with the law, the data subject has the right to submit a complaint regarding the protection of personal data to a competent supervisory authority, such as National Data Protection Commission “*Comissão Nacional de Proteção de Dados*” (CNPd) www.cnpd.pt.