

# PRIVACY POLICY

## LEGAL INFORMATION RELATING TO DATA PROTECTION

At Virtual Power Solutions we care about the safety of our customers. This is our top priority. And we know that the use of your personal data requires your complete confidence.

However, as no method of transmission or electronic data storage is 100% secure, we count on your attention to prevent any incidents related to computer fraud, risks or any other infraction in which your information can be accessed or disclosed without our expressed authorisation and on which, of course, we cannot be held responsible.

At Virtual Power Solutions we are subject to the highest privacy standards and will only use your personal data for clearly identified purposes and in accordance with your data protection rights.

We are committed to ensuring the transparency, confidentiality and integrity of your personal data.

This Privacy Policy establishes how Virtual Power Solutions uses the personal data of its customers, whether natural or legal persons, represented by its managers, administrators or attorneys-in-fact, and of its potential customers, within the scope of its professional activity, and is composed of the following sections:

### Who is responsible for the processing of your personal data

Virtual Power Solutions is responsible for the processing of the personal data of its customers and / or potential customers that complete their data, by completing and submitting the **Company Consent Form**. Virtual Power Solutions will be responsible for the processing of its customers' personal data if you have consented our communication under the Individual Communication Consent Form.

The Company is responsible for the processing of the personal data of its clients that are provided to it for the exercise of its activity, that fill out its data by completing the Consent Form for Individual Communication of the Company.

This policy is intended to describe the use of your personal data by the employees of the company. Therefore, it is important that you read this privacy policy. You should contact us regarding any changes or updates or doubts regarding the use made of your personal data, for the contacts that we indicate below in this text.

## How do we collect your personal information

Your personal data will be collected and processed in the following situations:

- If you complete your personal data on the Consent Form and / or
- If you use our services: providing in person or by e-mail your personal data, strictly necessary for the provision of contracted services. **For your privacy, we advise you not to include personal data, especially sensitive and / or confidential in the emails you send us, such as credit card numbers.**

We do not knowingly collect personal information from minors. As your legal guardian, we thank you for not allowing your children, under the age of 13, to send us personal information without your permission.

## For what purposes and on what grounds can your personal data be used

Your personal data will be collected and used primarily for providing Customer services (orders, transactions) and marketing (communication of information about our campaigns, news and other services, Company Newsletters, requests for comment on the satisfaction of our products and services), in strict terms that you select in the Consent Form.

Under the data protection legislation in force in Portugal and in the European Union (General Data Protection Regulation), the use of personal data must be justified under at least one legal basis for the processing of data personal. You can therefore consult the explanation of the scope of each of these grounds.\*

The legal basis applicable to the collection and use of your personal data for customer service and marketing is your **consent**.

### \* Legal basis for the processing of personal data

- When you have given consent to the processing of your personal data (for this purpose you will be presented with a consent form for the use of your data, which consent may be subsequently and at any time, easily withdrawn);
- How much processing is required to conclude a supply contract or to execute it;
- When the treatment is necessary for the fulfilment of the legal obligations to which the Company is subject;
- When processing is necessary to achieve a legitimate interest and our reasons for its use prevail over Customer's data protection rights;
- When treatment is necessary so that we may exercise or defend a right in a legal proceeding to be brought or brought by a third party against the Client.

## **What personal data can be collected**

The following categories of personal data may be collected through the channels and services described in this Privacy Policy:

### **DATA COLLECTED BY THE COMPANY:**

**Name**

**Email**

**Phone**

**Address**

**NIF**

## **How do we keep your personal data safe**

We use a variety of security measures, including encryption and authentication tools, to help protect and maintain the security, integrity, and availability of your personal information.

Although data transmission via the internet or website cannot guarantee complete security against intrusions, we and our service providers and business partners make every effort to implement and maintain physical, electronic, and procedural safeguards to protect your personal data in accordance with the applicable data protection requirements. Among others, we have implemented the following:

- Restricted personal access to your personal data based on the criterion of "need to know" and only within the scope of the purposes communicated;
- Only our employees, service providers and business partners whose functions require this and who previously bind themselves to secrecy and confidentiality will have access to the personal data processed by Virtual Power Solutions;
- Only personal data that are appropriate, relevant and not excessive and for the time strictly necessary will be processed;
- Transfer of data collected only in encrypted form;
- Storage of highly confidential data (such as credit card information) only in encrypted form;
- Protection of information technology systems through firewalls, to prevent unauthorised access to your personal data; and
- Continuous monitoring of access to information technology systems to prevent, detect and prevent the misuse of your personal data.

## **How long we keep your personal information**

We store your data only for as long as it is necessary for the purpose for which it was collected.

Once the maximum period of conservation has been reached, your personal data will be irrevocably anonymised (anonymised data may be retained) or destroyed in a secure manner.

For the purposes described in this Privacy Policy (customer service and marketing) your personal data will be kept for a maximum period of 10 years from the last purchase made at Virtual Power Solutions and if, within this period, you have not withdrawn the consent. For curricula applying to Virtual Power Solutions, up to a maximum term of 5 years.

## **With whom we can share your personal information and how we keep you safe**

We do not sell, market or transfer to third parties your personally identifiable information. This does not include trusted third parties who help us manage our site or mobile applications by providing services to our customers, provided such third parties agree to keep such information confidential.

Non-personally identifiable visitor information may be provided to other parties for marketing, advertising or other uses. In fact, we may use technologies such as cookies to record session information, collect visits, and access details of our web pages that allow us to continue to improve our services and provide better and more useful resources to our site users.

Cookies are pieces of information that are commonly used by many sites for record keeping purposes that may help you remember, for example, your preferences. A cookie by itself does not personally identify any user of a particular site.

Please note that although you may find yourself on a site operated by us, you may also be referred to third-party site links, as we may include or offer third-party products or services on our platforms. These third-party sites have their own privacy policies independent of ours. These policies are neither managed nor controlled by the Company, which therefore does not assume any responsibility for them. However, we seek to protect you from risks even in such cases, so we recommend that you carefully read the terms and conditions and privacy policies of these sites before submitting any information or personal data.

Your personal data is stored on the protected servers of our suppliers / service providers, being accessed and used exclusively under our policies and standards (or equivalent policies and standards of our suppliers / service providers).

## \* Virtual Power Solutions Contact Details

Email: [mail@vps.energy](mailto:mail@vps.energy)

Phone: +351 239 791 400, available from 9:00 a.m. to 6:00 p.m. from Monday to Friday

## How you can change or withdraw your consent

You may at any time change or withdraw your consent, in whole or in part, with effect for the future.

Upon complete withdrawal of your consent statements you will no longer be contacted and receive communications for the purposes described in this Privacy Policy.

To withdraw your statements of consent submitted to Virtual Power Solutions, simply fill in your personal data and return us the Consent Form, indicating what personal data you want us to stop having. The last Consent Form submitted to Virtual Power Solutions will prevail over all previous Consent Form.

Alternatively, the consent granted to the Company can be withdrawn through contact to our e-mail above indicated.

## Please contact us, your data protection rights and the right to complain to your supervisory authority

If you have any questions regarding our use of your personal data, you should first contact our services.

Subject to certain conditions, you may have the right to request us to:

- provide you with additional information about how we use your personal information;
- provide you with a copy of the personal information you have provided to us;
- provide the personal information you have provided to another party responsible for your treatment at your request;
- update any inaccuracies or changes in personal data that we retain;
- erase personal data whose use is no longer legitimate;
- limit how we use your personal data until the complaint is investigated.

Your exercise of these rights is subject to certain exceptions intended to safeguard the public interest (prevention or detection of crimes) or our interest (maintaining professional secrecy).

If you exercise any of these rights, we will analyse them and respond within 30 days.



If you are dissatisfied with our use of your personal data or with our response after exercising any of these rights, you have the right to submit a complaint to the supervisory authority - **National Data Protection Commission** - CNPD | Rua de São Bento, nº 148, 3º, 1200-821 Lisbon | Tel: **+351 213928400** | Fax: +351 213976832 | e-mail: [geral@cnpd.pt](mailto:geral@cnpd.pt)) or to bring legal action on this basis.

Coimbra, May 10, 2018

