

# Privacy Policy

Plan C Technologies is a Domotic and Audio and Video Integration company registered under the name Plan-C Technologies, Home Automation and Audio and Video Integration, Unipessoal Lda, headquartered at Rua Cimo de Coura n ° 1, 3660-114 Figueiredo de Alva

For Plan-C Technologies the privacy of your data is important. We thank you for your trust in us. To that extent, we have implemented various physical, electronic and procedural measures that allow us to safeguard your privacy while also preserving your personal information, we also guarantee that your data will be processed in accordance with its purposes and the rights that the law enshrines, guided by the legal principles in force for the area of privacy and protection of personal data, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council - General Regulation on Data Protection (RGPD) - and remaining applicable privacy and data protection legislation, including the national legislation supplementing the RGPD.

In this regard we have created the Terms of the Privacy Policy to ensure that the Registered Customer knows what information is collected and how it is used. These apply to all customers who wish to register on our website. Therefore, when visiting and / or using our website, you must read and accept the Privacy Policy and commit to being bound by it and all the foregoing.

Here are explained the conditions in which all the personal information that is available to us when you visit and / or use our website is dealt with. Any personal information that we may request from you as a User of our website or Registered Customer (only companies) will be treated in accordance with Plan-C Technologies' Terms of Privacy and will not be shared with third parties, except in cases stipulated on these terms.

By using our website, you consent to the collection, storage, disclosure and use of your data in accordance with the provisions of this Privacy Policy, and you accept its terms and conditions.

Plan-C Technologies reserves the right to revise and modify this Privacy Policy from time to time with a view to improvement by posting the revised version on its website. We also encourage you to check and revise this privacy policy from time to time so that you are aware of the changes you have made.

## Entity Responsible for the processing of personal data

Plan-C Technologies Lda registered at the Commercial Registry Office with the unique registration number and company number 514.498.846, is the entity responsible for the processing of the personal / business data of its customers and / or potential customers. For questions related to the processing of your personal / business data, you should contact us through the following means: **Address:** Rua Cimo de Coura n ° 1 / 3660-114 Figueiredo de Alva / Portugal **Email:** site @ plan-c-technologies .pt

## Definition

Under the RGPD, Personal data is any information of any nature and in any medium relating to an identified or identifiable natural person. Any person who can be identified directly or indirectly, for example through the name, the identification number, a location data, an electronic identifier or other elements that allow the identification of that individual is identified as identifiable.

## Application

This Privacy Policy applies to the personal / business data we receive in connection with the business relationship with customers, potential customers or suppliers, in compliance with applicable legal obligations, as well as the personal data of users of our site.

## Collection

Whenever you visit our website, the server where it is hosted may obtain behavioral data from users such as IP's, used browser, operating system and country of access to these statistics and not being processed by Plan-C Technologies nor being accessible to it. You can request information about these data by sending an email to the following email: site@plan-c-technologies.pt;

When you visit the Plan C Technologies website and only when you make a registration request in and only in the Name of the company you represent (only business registrations are accepted), the data that is collected are those indicated in the Registration form (Company Name; Name of Responsible Person; Contact Email; Telephone) The data requested is from the company and never on an individual name. The purpose of this information collection is to create a customer card for future contacts and business operations.

When you want to get in touch with us through the contact form you are requested the Name, Telephone contact and email for later contact. Plan-C Technologies may use this information to communicate news, promotions,

discounts and other information that may be of interest to you. These may be communicated to third parties if it is in the best interests of the Customer.

## Pickup Time

You may provide us with certain personally identifiable information when:

- Register to get an account;
- Fill out the Contact form;
- Contact Plan-C Technologies through the contacts provided;
- Other situations where Users voluntarily provide their personal data to Plan-C Technologies

All data required for the formalization, execution and management of contracted services may be collected, including, but not limited to:

- Contact information: company name; taxpayer number; CAE; address; email; mobile phone; billing address; shipping address;
- Personal information: name; taxpayer number; address; email; mobile phone; billing address; shipping address;
- Other: details about devices; IP addresses;
- Note that you may also provide us with this information about other people, for example if you use third-party email accounts or third-party computers thus informing your IP;

We never collect credit card data since we do not make online sales.

## Basis for the collection of personal data

The personal data collected is intended for the management of the contractual and commercial relationship between Plan-C Technologies and the Customer.

Under the terms of the RGPD, personal data processing should have a legal basis for such treatments, which may include:

- **Consent:** when you have your expressed consent - in writing, orally or through the validation of an option - and prior and if such consent is free, informed, specific and unambiguous. Examples include your consent to send direct marketing messages; profile definition; call recording;
- **Contract execution and pre-contractual procedures:** when the processing of personal data is necessary for the execution, execution and management of the contract entered into with Plan-C Technologies, such as for use of the website, requests for information, preparation of proposal service provision, contact / complaint management, billing / collection / payments;

- **Compliance with legal obligation:** when the processing of personal data is necessary to fulfill a legal obligation to which Plan-C Technologies is subject, such as the communication of data to police, judicial, fiscal or regulatory entities;

- **Legitimate interest:** when the processing of personal data corresponds to a legitimate interest of Plan-C Technologies or third parties, such as improvement of quality of service, detection of fraud, when the reasons for their use should prevail over their rights of the data subjects.

## Length of storage of personal data

We treat and store your personal data to the extent necessary to fulfill our contractual and legal obligations.

There are cases in which the law requires the processing and preservation of data for a minimum period of time, namely for 10 years in the case of data necessary for informing the Tax Authority, for accounting, tax or commercial bookkeeping purposes.

In other cases, we will keep your data only for as long as it is necessary for the purpose for which it was collected or, if it exists, for the period of time authorized by the National Data Protection Commission (CNPD). Once the maximum period of conservation has been reached, your personal data will be irrevocably anonymised (anonymised data may be preserved) or destroyed in a secure way.

But, where there is no specific legal obligation, then the data will be processed only for the period necessary to fulfill the purposes that led to their collection and preservation and always in accordance with the CNPD's law, guidelines and decisions. In the context of the recording of calls, if there are, and under the terms of the normative authorization, Plan-C Technologies will keep the recordings to prove the commercial transaction and communications within the scope of the contractual relationship for the duration of the contract agreed between the parties plus the deadline prescription and expiry which is 6 months.

Plan C Technologies may also record and retain calls for the purpose of monitoring the quality of service and based on Customer's consent, but for this purpose calls will be retained for a maximum of 30 days.

Regarding the video surveillance of its installations, Plan-C Technologies will only keep the recordings of images and their personal data for a maximum period of 30 days.

Plan-C Technologies may maintain other personal data for periods longer than the duration of the contractual relationship, whether based on its consent, or to ensure rights or duties related to the contract, or because it has legitimate interests that justify it, but which is strictly necessary for the fulfillment of the respective purposes and in accordance with the guidelines and decisions of the CNPD.

## Personal data Transmission

As a rule, Plan-C Technologies does not share personal data about you with third parties without your consent. However, Plan-C Technologies provides data to its partners, service providers, and other trusted service providers for limited purposes, such as:

- Compliance with customer orders;
- The offer of certain products and services;
- The provision of customer support services;
- Information management on our behalf;
- Improvement of the characteristics and functionalities of the website.

In such cases, we require such persons to undertake to use the data solely for the purposes for which we provide them and in accordance with our privacy policy. The partners are legally and contractually obligated to respect Plan-C Technologies' privacy policy.

The user, when registering on the website, request a service that we provide with a third party, accepts that we may provide data (such as name, contact and address) to such third parties, to the extent that they are necessary for the execution service requested by the customer.

Plan-C Technologies may also disclose customer data (including user's name, addresses, telephone number and account activity) whenever, in its sole discretion, it believes that such disclosure is necessary or appropriate for, for example, to enforce the law, subpoenas, mandates among others.

If you access third-party sites such as Facebook, Twitter, LinkedIn and YouTube through the Plan-C Technologies Sites, you should carefully read the privacy policy of the third-party website you visit before using it or disclosing your personal data to its service provider., since Plan-C Technologies can not control how third parties use personal data that the User discloses to them.

Within Plan-C Technologies, employees who need them to comply with contractual / pre-contractual and legal procedures or obligations have access to their data.

Plan-C Technologies may also process data outside Portugal and the European Economic Area (EEA), where data protection laws may offer less protection than in Portugal and the EEA. However, you will use the security mechanisms described below.

## Security Mechanisms

### Registration

Whenever you register on the Plan-C Technologies website, you are prompted to choose a password to ensure the protection of your data as well as to enter an email address. This record must be accepted by the responsible person in Plan C Technologies, and the data verified for confirmation that they are business and not personal data.

The user's Plan-C Technologies account data is protected by a password in order to ensure the privacy and security of the User, who must always take measures to protect the confidentiality of the password he chooses in order to avoid access not authorized to your password and your computer. In particular, you should immediately notify Plan-C Technologies of any unauthorized use of your User account, or any other breach of security, and ensure that you leave your User account at the end of each session.

The User is responsible for preserving the confidentiality of his password and User account, and is also responsible for all acts performed through the use of his password or User account. You may change your password as many times as you like by following the instructions in this area in your personal area. Plan- C Technologies will not be liable if your account is used improperly for the negligence of the registered User.

The User may choose not to provide Plan-C Technologies with certain information, but this may result in the inability to use certain features of our website, as such information may be necessary for the User to register as a Customer.

### Contact form

The User is responsible for the data that they choose to send that are not requested in the contact form.

In addition, Plan-C Technologies prevents unauthorized access or disclosure by using a variety of security measures, including encryption and authentication tools, to help protect and maintain the security, integrity, and availability of your personal data.

## Data Holders Rights

Plan-C Technologies, in compliance with the RGPD, guarantees the following rights to the holders of personal data:

Right of Access: right to obtain information about which of your personal data are processed, what are the purposes of the treatment, what are the conservation periods, among others.

Right of Rectification: right to request rectification of your personal data that is inaccurate or request incomplete personal data to be completed, such as the address, NIF, email, telephone contacts, or other.

Right to Forgetfulness: the right to have your personal data forgotten, as long as there are no valid grounds for its preservation, for example in cases where Plan-C Technologies is obliged to keep the data in order to fulfill a legal obligation or because a court case is in progress.

Right to Portability: right to receive the data you provided us in digital format of current use and automatic reading.

Right to Limitation: right to request the limitation of the treatment of your personal data, in the form of: (i) suspension of treatment or (ii) limitation of the scope of treatment to certain categories of data or purposes of treatment.

Right to Withdraw Consent or Right of Opposition: right to object or withdraw consent at any time to data processing based solely on such consent, for example in the case of data processing for marketing purposes , provided that there are no legitimate interests that prevail over their interests, rights and freedoms, such as the defense of a right in a judicial process.

Right to complain: right to complain to the national control authority, CNPD.

Should the User have any doubts regarding this Privacy Policy, as well as the exercise of the abovementioned rights, please contact us through the e-mail address [site@plan-c-technologies.pt](mailto:site@plan-c-technologies.pt).

After receiving documents proving the identity of the User, the User may request the deletion, correction or modification of any or all of the data.

Unless otherwise noted, Plan-C Technologies's current privacy policy applies to all information that Plan-C Technologies maintains about you and the Customer account.

September 29, 2018