

PRIVACY POLICY

General Data Protection Regulation

(Regulation (EU) No. 2016/679 of the European Parliament and of the Council, of 27th April 2016)

Data contoller

MBO Máquinas, S.A. is a Public Limited Company engaged in the manufacture of printing machines. It has the need, in that capacity, to collect, access and process personal data inherent and related to its main activity, which implies that it takes on, in this case, the position of Data Controller with all the inherent obligations and duties.

Nature of our activity

Our business requires that we adhere to the strictest ethical and legal principles, always respecting the privacy of all those whose personal data we collect and process to carry out our business, whether they are our employees, collaborators, customers or others.

Although our main activity does not consist of the direct processing of personal data, this is presented as accessory to our activity and therefore we provide the guarantee of its processing in compliance with the obligations arising from the GDPR.

Personal data processing operations

The only purpose of the personal data collected from our employees, collaborators, customers, among others, is to gather the information necessary to provide our services.

We collect data, in our activity, when signing employment contracts, recruitment, provision of services, orders, purchase and sale contracts or others.

The sole purpose of the data collected is for the conclusion of contracts (employment, provision of services, purchase and sale, transport, among others) and the provision of services to the data subjects and the development of our business activity, in compliance with the legal and contractual obligations inherent in those contracts and in our activity.

Security and confidentiality

All our employees, both internal and external, are obliged to guarantee the confidentiality and protection of information as established in the General Data Protection Regulation. They are required to keep absolute secrecy about any information or data of a technical, pedagogical, financial or health nature that may be acquired, necessarily or involuntarily, during the employment relationship or because of it, concerning the Employer or any other persons, natural or legal, connected with it, namely other employees, associates, partners, suppliers, customers and family members, unless previously authorised in writing by the Employer.

Any replication, copy, modification, public communication, distribution or any other type of transfer, whether free or paid, of any documents, including computer programmes, publications, information contained in databases, or any other intellectual material belonging to or relating to the Company or to any third party related to it is expressly prohibited, unless previously authorised in writing by the Employer.

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Subcontractors/partners

Our concern with ensuring secrecy and confidentiality in the processing of personal data covers our subcontractors and partners, from whom we require sufficient guarantees of the processing of data in compliance and obedience with the processing rules arising from the GDPR.

This is intended to assure the personal data subjects that the processing of their data is confidential, secret and in accordance with all data processing rules and this privacy policy, as well as internal orders, instructions and procedures to respect the privacy of the data subjects.

Data processing guarantees

We guide all our actions by the following data processing rules, and we also extend the same requirements to third parties and subcontractors:

- Personal data will be processed in accordance with the legal scheme for data processing, the present privacy policy and with the guarantee of lawful, loyal and transparent processing;
- The data collected is merely instrumental to our activity. It is intended for a defined, specific and legitimate purpose, with any subsequent processing being incompatible with these purposes;
- We respect the principle of data minimisation, collecting only the data deemed adequate, relevant and necessary for the purposes of collection and processing;
- In accordance with the principle of accuracy, we shall keep your data accurate and up-to-date whenever
 necessary, adopting and making available to the data subject all the measures necessary to ensure its
 permanent accuracy and correction, namely the right of rectification;
- We assume the principle of concern for the retention of your data in such a way that it is possible to identify you only for the period necessary for the purposes for which the data is processed;
- We will process your data in accordance with the Security Principle protecting your data from possible
 unlawful and unauthorised processing, preventing possible loss, destruction or unforeseen damage,
 adopting all appropriate technical and organisational measures for data processing which ensure the
 security, integrity and confidentiality of the data;
- Our legitimacy for the processing of personal data is based on the consent of the data subject, whenever
 this is the sole reason for legitimacy; on the need to comply with the contract or pre-contractual
 procedures, to safeguard the vital interests of the data subject or a third party, and to comply with legal
 obligations or whenever the processing is necessary for the purposes of the legitimate interests of the
 Company;
- Whenever consent to data processing is requested, we will provide the necessary information regarding the purposes of the processing and we shall remain faithful to those purposes.

Right to image

Your image will always be protected, which we will only record, use or disclose with your prior consent, or that of your legal representative, and always when justified by the need to facilitate our work, commercial interests, preservation of collective memory or for identification for reasons of security, identification or communication facilitation.

The holder of the image right may, at any time, request the withdrawal of consent for the future.

The personal data we have access to is information necessary for the exercise of our activity and shall remain attached to this activity, and may not be used for any other purpose.

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Data subject's rights

The data subjects shall be entitled, at all times, to access their personal data and the processing thereof and to consult those data, rectify them, request their deletion or destruction, their portability, as well as object to their processing or the taking of decisions based on automated profiling.

You may exercise your rights through the e-mail address rgpd@mbo-pps.com.

Data protection

MBO Máquinas, S.A. takes the protection of its data very seriously. We have, therefore, taken steps to ensure that we observe the data protection provisions. By visiting or using the MBO Máquinas, S.A. website you are agreeing to our terms and provision of use.

Please note that if you activate external links and references you are leaving the MBO Máquinas, S.A. website and that this data protection statement does not apply to external links.

Changes to this data protection statement may be necessary as part of the continuing development of our internet provision and the technology used. We, therefore, recommend that you occasionally re-read the data protection statement.

Personal data

At some points in the MBO Máquinas, S.A. website you are asked to provide personal information. Completion of the corresponding forms is entirely optional. At these points you are explicitly asked to agree to data storage and transfer. We exclusively store and transfer the personal data provided for the purpose for which your details were provided. There is no transfer or sale to third parties. Should data be forwarded to third parties, this is only to the extent to which you have expressly given your permission or this is necessary for the purpose of fulfilling the contract concluded with you (for example, transfer to suppliers). In doing so the data protection regulations are technically and organizationally complied with. You may withdraw the approval given for this purpose for future effect at any time.

Data processing and storage of IP addresses

We are legally obliged to collect and exchange data whenever you visit an Internet site. MBO Máquinas, S.A. automatically collects and stores data that your browser transfers to our server. This information is:

- The type and version of your Internet browser
- The operating system used
- The page accessed
- The file accessed
- Previously visited pages (referrer URL)
- Date and time of the server request

MBO Máquinas, S.A. assesses data solely for statistical purposes in order to measure the demand of your website. MBO Máquinas, S.A. is not able to ascribe this data to a specific person.

Cookies

MBO Máquinas, S.A. uses what are known as session cookies. Session cookies are small text files that are stored in your computer's memory. A randomly generated distinct identification number is filed in a session cookie known as a session ID. A cookie also contains the information about its origin and the storage term. Cookies do not contain any personal data such as, for example, your e-mail address.

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Cookies can be controlled by any Internet browser. Most browsers are set up to accept all cookies without asking the user. If you wish to know the full extent of the MBO Máquinas, S.A. website function you should set your browser to accept session cookies.

All Internet browsers can show when cookies are set and what they contain. Detailed information can be obtained from the virtual data protection office of the Federal and State Protection Commissioners in Germany: https://www.datenschutz.de/.

You can deactivate the use of cookies in your browser settings at any time. If you reject all cookies, it may not be possible to use certain functions such as, for example, the login function.

Matomo web analysis cookies

For marketing and website optimisation purposes MBO Máquinas, S.A. uses Matomo (<u>www.matomo.com</u>). This is a web analysis service. Matomo uses what are known as cookies. Cookies are text files that are stored on your computer and allow us to analyse the use of our website. For this purpose the usage information collected by the cookie (including your abbreviated IP address) is transferred to our server and stored for usage analysis purposes. Your IP address is immediately anonymised as part of this process so that you remain anonymous to us as the user. The information about your use of our website collected by the cookie is not forwarded to third parties. You may prevent the use of the cookies by setting your browser software appropriately. In this case, though, you may not be able to use all the functions of the MBO Máquinas, S.A. website.

If you do not consent to the storage and assessment of this data from your visit you can at any time withdraw permission for storage and usage. In this case what is known as an opt-out cookie is filed in our browser that prevents Matomo from collecting session data. If you delete your cookies this also deletes the opt-out cookie and you may have to reactivate it. (Source: Matomo data protection declaration from http://www.datenschutzbeauftragter-info.de).

If you have set "I don't want to be tracked" in your browser (do-not-track activated), Matomo will not track these visits."

E-Mails

If you send an e-mail to us, this e-mail and your e-mail address will be exclusively used for correspondence with you. In the case of applications and polls the personal data provided will only be stored to deal with the application process.

Videos

The MBO Máquinas, S.A. website uses the services of YouTube to show videos: https://www.youtube.com/. For technical reasons integrating videos requires the YouTube server to be called. With regard to the use to YouTube of data from your server, please refer the data protection notice: https://www.google.de/intl/de/policies/privacy/.

Right of access

You have at any time the right to access information stored about you, its origin and recipient and the purpose of storage. You are also entitled to correct or to arrange deletion of the personal information that we store about you. Deletion may be prevented if we are legally obliged to store the data. MBO Máquinas, S.A. will issue information about the data stored about you through: info.pt@mbo-pps.com.

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Contact

For further information please contact the MBO Máquinas, S.A. team at: <u>info.pt@mbo-pps.com</u> and our external data protection officer, Ulrich Kämmerling, at: <u>ulrich.kaemmerling@intellidat.de</u>.

Changes to the privacy policy

MBO Máquinas, S.A. reserves the right to change, modify, add to or amend this Privacy Policy at any time, without prior notice. These changes will be publicised.

Perafita, 1st October 2021

www.mbo-pps.com