



PERSONAL DATA AND PRIVACY PROTECTION POLICIES

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SIMOLDES complies with all applicable EU and national legal standards in the area of personal data protection, privacy and information security. SIMOLDES is implementing a Personal Data Protection System and an Information Security System in order to ensure regulatory compliance and demonstration or disclosure of institutional responsibility for data protection and information security, implementing all necessary technical and organizational measures, both to comply with the general legal regime of the current Data Protection Law and to comply with the special legal regime of the General Regulation on Data Protection, applicable from May 25, 2018. For any clarification or additional information or for the exercise of rights in this area, please contact the SIMOLDES Data Protection Office by e-mail protecaodedados@SIMOLDES.com.

02 Meaning

"Personal data"

"Personal data" means information relating to an identified or identifiable private person ('data subject'); an identifiable person is a private person who can be identified, directly or indirectly, in particular by reference to an identifier. Personal identifiers are for example, a name, an identification number, location data, identifiers by electronic means or one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of that private person.

"Processing of Personal Data"

"Processing" means an operation or a set of operations carried out on personal data or on personal data sets by automated or non-automated means such as collection, registration, organization, structuring, conservation, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of disclosure, comparison or interconnection, limitation, erasure or destruction.

"Cookies"

"Cookies" are small text files with information deemed relevant that the devices used for access (computers, mobile phones or portable mobile devices) carry, through the browser, when an online site is visited by the Client or User.

03 Entity Responsible for the Data Processing

SIMOLDES, with headquarters in Rua Comendador António da Silva Rodrigues, nr 100, registered at the Commercial Registry Office of Lisbon, under the number of registration and of a Collective Person 51429887, with the share capital of 50 000,00 Euros, hereinafter referred to as the SIMOLDES. This entity comprises the following companies:

COMPANY	LOCATION	NIPC	SHARE CAPITAL
SIMOLDES AÇOS, SA	Rua Comendador António Silva Rodrigues, nº 100 3720 - 502 Santiago de Riba UI - Oliveira de Azeméis	500 250 650	3 243 000.00€
MDA – Moldes de Azeméis, SA	Rua Comendador António Silva Rodrigues, nº 285 3720 - 502 Santiago de Riba UI - Oliveira de Azeméis	502 546 646	2 345 000.00€
IMA – Indústria de Moldes de Azeméis, SA	Rua Comendador António Silva Rodrigues, nº 99 3720 - 502 Santiago de Riba UI - Oliveira de Azeméis	503 001 015	500 000.00€
IGM – Indústria Global de Moldes, SA	Rua Dr. Silva Pinto, n.º 195 3720 - 502 Santiago de Riba UI - Oliveira de Azeméis	504 938 371	1 000 000.00€
MECAMOLDE – Moldes para Plásticos, SA	Rua Comendador António Silva Rodrigues, Nº500 3720 - 502 Santiago de Riba UI - Oliveira de Azeméis	501 341 501	425 000.00€
ULMOLDE – Moldes Técnicos, SA	Ouriçosa 3720 - 592 UI	502 752 548	750 000.00€
SIMOLDES AÇOS BRASIL, LTDA.	Rodovia BR 376 KM 628,5 Nº 26500 Campo Largo da Roseira - Paraná São José dos Pinhais, 83090-360 Brasil	02810.621/0001-66	12.242.045,00 BRL
ACS ADVANCED CUSTOMER SERVICE DEUTSCHLAND GMBH	Vor dem Langen Loh 6 D-35075 Gladenbach-Mornshausen Deutschland	DE 813544791	90.000,00 €
ACS ADVANCED CUSTOMER SERVICE ARGENTINA SRL	Calle Septiembre Nº 145 (altura ruta Panamericana KM 47,5), Escobar Pcia.de Buenos Aires 1625 B1625XAF Belén de Escobar Argentina	30-70939443-2	1.060.000,00 ARS
ULTRA PRESS SA	Calle Septiembre Nº 145 (altura ruta Panamericana KM 47,5), Escobar Pcia.de Buenos Aires 1625 B1625XAF Belén de Escobar Argentina	30-55515841-2	7.713.000,00 ARS
PENTAP, SA	Calle Septiembre Nº 145 (altura ruta Panamericana KM 47,5), Escobar Pcia.de Buenos Aires 1625 B1625XAF Belén de Escobar Argentina	30-70853743-4	12.000,00 ARS
ACS FRANCE, SARL	Parc de L'Echangeur - ZI nº 9 59264 Onnaing France	FR 86444084099	60.000,00 €

ADVANCED CUSTOMER SERVICE IBÉRICA, SL	Calle Pintor Sert, 1 A 1º E-08760 Martorell, Barcelona Espanña	ES B63059166	45.000,00 €
ADVANCED CUSTOMER SERVICE MÉXICO, S.A. DE C.V.	Calzada Zavaleta 3922 -8 Col. Santa Cruz Buenavista C.P. 72170 Puebla Mexico	ACS1507084Q9	400.000,00 MXN
Simoldes Aços Maroc SARL	Atlantic Free Zone Lots nº 13.12 et 13.13 Amer Safia, Kenitra Maroc	25293679	100.000,00 MAD
SIMOLDES PLÁSTICOS, S.A.	Rua Comendador António da Silva Rodrigues, nº 165 3720-502 Santiago de Riba-Ul Portugal	501 220 267	2 000 000€
INPLAS - Indústrias de Plásticos, S.A.	Rua Dr. Silva Pinto, nº 317 3720-193 Oliveira de Azeméis Portugal	503 001 031	500 000€
PLASTAZE - Plásticos de Azeméis, S.A.	Rua José Maria Castro Júnior, nº 271 3720-351 Vila de Cucujães Portugal	503 539 554	2 000 000€
Simoldes Plásticos Indústria, Ltda.	Rodovia João do Amaral Gurgel, Km 1 - Jardim América Caçapava - SP, CEP 12289-410 Brasil	01.214.052/0001-23	114 118 630.00 BRL
Simoldes Plásticos Brasil, Ltda.	BR 376 Km 628 - Nº 26500 - A, Campo Largo da Roseira São José dos Pinhais - PR, CEP 83090-360 Brasil	01.640.335/0001-37	11 704 740,48 BRL
Simoldes Plasticos France, s.a.r.l.	Parc de L'Echangeur - ZI nº 9 59264 Onnaing França	FR 03418746863	37 000€
Simoldes Plasticos Polska Sp. Z.o.o.	Ul. Zachodnia 7. 55-220 Jelcz-Laskowice Polónia	PL 5213244622	47 330 500,00 PLN
Simoldes Plasticos Czech s.r.o.	Lipovka 162 516 01 Rychnov nad Kneznou República Checa	CZ 03545695	147.000.000,00 CZK
Simoldes Plasticos Deutschland Engineering, GmbH.	Max-von-Laue-Weg 9 38448 Vorsfelde / Wolfsburg Alemanha	DE 813188002	25.000,00 €
Simoldes Plasticos España, S.L.	Calle Pintor Sert 1A - 1º 018760 Martorell, Barcelona Espanña	B 62741954	100.000,00 €

Simoldes Plasticos France Engineering, s.a.s.	Immeuble Le Florestan 2 boulevard Vauban 78180 Montigny le Bretonneux França	FR 90 452 842 198	37.000,00 €
Simoldes Plasticos Maroc, s.a.r.l.	Zone Franche d'Exportation de KENITRA - Atlantic Free Zone. Lots nº 13.9, 13.10 et 13.11 - Kenitra Marrocos	MA 25293726	100.000,00 MAD
Simoldes, Lda	Rua Comendador António da Silva Rodrigues, nº 100 3720-502 Santiago de Riba-Ul Portugal	514197927	180.210.000,00 €
SIMOLDES II - PLASTIC DIVISION, S.A.	Rua Comendador António da Silva Rodrigues, nº 100 3720-502 Santiago de Riba-Ul Portugal	514 209 925	89.405.000,00 €
Simoldes III - Tool Division, S.A.	Rua Comendador António da Silva Rodrigues, nº 100 3720-502 Santiago de Riba-Ul Portugal	514209887	90.900.000,00 €

SIMOLDES is the entity responsible for the online site www.SIMOLDES.com and for the computerised applications, hereinafter referred to as channels or applications, through which Users, Service Recipients or Customers have remote access to SIMOLDES services and products that are presented, traded or provided at any time through them. The use of channels or applications by any User, Applicant or Customer may entail the performance of personal data processing operations, whose protection, privacy and security by SIMOLDES, as the entity responsible for its treatment, is ensured, in accordance with the terms of this Privacy and Data Protection Policy.

04 Contact Details of the Data Processing Manager

In order to contact SIMOLDES Data Protection Office, please send an e-mail to protecaodedados@SIMOLDES.com, describing the subject matter of the request and indicating an e-mail address, a telephone contact or a mailing address.

For any other purposes, please use the following SIMOLDES general contact:

- E-mail: geral@igm.com.pt | geral@ima.pt | geral@mda.pt | geral@mecamolde.com.pt | geral@simoldesacos.pt | geral@ulmolde.com.pt
- Telephone: 256 661 600

05 Collection of and Processing Personal Data

SIMOLDES processes the personal data strictly necessary to make information available and the for operation of its channels, according to the uses of the Users, Recipients of the Service or Customers, both those that are provided by Users or Recipients of the Service for the purpose of registration of requests or for obtaining information, and those provided by Clients for the purposes of adhesion to those channels, or those resulting from the use of the services provided by SIMOLDES through them, such as accesses, consultations, instructions, transactions and other registrations of their use.

The use or activation of certain channel functionalities may involve the processing of a number of direct or indirect personal identifiers, such as name, home address, contacts, device addresses or geographical location, whenever there is an express consent of the User, Candidate or the Client.

In all cases, Users, Service Recipients or Customers will always be informed of the need to access such data for the use of the functionalities of the channels in question.

Personal data collected by SIMOLDES is handled in a computerized way, in certain cases in an automated way, including file processing or profile definition, and in the management of pre-contractual, contractual or post-contractual relationship with Users, Service Recipients or Customers, in accordance with current national and Community standards in force.

06 Categories of Processed Data

The categories or types of personal data of the Users and Clients being treated are as follows:

- *User Code, Social Security Number, Tax Payer Number, ID card or other, Name, Address, Phone number, Mobile phone number, Fax, Email, Process number, Notification Number, Quote, Legal number, Claim number, Remarks, Comments (free writing), Enforcement Officer Number, Bank Account Number, TIF code, Number of Household Members, Date of Birth, Date of Death, Health Number, Date of Incorporation, Card Number, Location of Reception, Residence, PSNI, Doctor's Professional License, Number of Income Statement, Car Registration Number, Lawyer's Professional License.*
- The categories or types of sensitive personal data of the Users and Clients being processed are the following:
Philosophical Beliefs, Race or Ethnicity, Private Life, Health, Genetics, Sex Life, Political Affiliation, Religious Affiliation, Trade Union Membership, Credit and Solvency, Suspicion of Illicit Activities, Criminal Offenses, Offenses.

07 Legal Principles

All data processing operations comply with the fundamental legal principles in private data protection and privacy, in particular as regards its circulation, lawfulness, loyalty, transparency, purpose, minimization, conservation, accuracy, integrity and confidentiality. SIMOLDES is available to demonstrate its responsibility to the data subject or any third party having a legitimate interest in this matter.

08 Legitimacy Grounds

All personal data processing operations carried out by SIMOLDES have legitimacy grounds, namely either because the data subject gave his consent to the processing of his personal data for one or more specific purposes, or because the treatment is considered necessary for the performance of a contract in which the data subject is a party, or for pre-contractual arrangements at the request of the data subject, or because the processing is necessary for the fulfillment of a legal obligation to which the controller is subject to, either because the treatment is required for the legitimate interests pursued by SIMOLDES or by third parties.

09 Purpose of Personal Data Processing

All personal data processed within the SIMOLDES channels are exclusively intended for the provision of information to Users, the management of personal information of the Recipients of the Service deemed necessary for the purpose of managing the relationship or communication, as well as the provision of the services contracted by the Customers and, in general, the management of pre-contractual, contractual or post-contractual relationship with Users or Customers.

The personal data collected may eventually also be processed for statistical purposes, for advertising or promotional actions, and for commercial or marketing actions, in particular to promote actions to disseminate new functionalities or new products and services, through direct communication, either by postal mail, or by electronic mail, text messages or telephone calls or any other electronic communication.

Having ensured the prior information and the collection of the express authorization for the latter purposes, Users or Clients may at any time exercise their right of opposition to the use of their personal data for other purposes that extrapolate the management of the contractual relationship, namely for marketing purposes, for sending information communications or for inclusion in lists or information services, and for this purpose, shall send a written request addressed to the SIMOLDES Data Protection Office in accordance with the procedures set out below.

10 Personal Data Storage Period

The personal data will be stored only for the period necessary for the purposes that led to their collection or subsequent processing, ensuring the compliance of all applicable legal rules on archiving.

11 Use of “Cookies”

SIMOLDES may possibly use two broad categories of 'cookies': 'cookies' on the online websites and 'cookies' of direct electronic communication channels, whereby in any one of the categories the respective opt-out by Users or Customers is guaranteed.

SIMOLDES uses cookies in its website to improve the performance and navigation experience of Users and Customers, increasing, on the one hand, the speed and efficiency of response and, on the other hand, eliminating the need to enter the same information repeatedly.

The use of cookies helps websites to recognize the devices of Users and Customers the next time they visit them, and in some cases it is also essential for their operation.

The cookies used by SIMOLDES in all its channels do not collect personal information that allow the identification of the Users or the Customers, storing only generic information, namely the form or geographic location of access and the way they use the channels, among others. The cookies only retain information related to the preferences of Users and Customers, and no personal identifiers are registered.

Users, Service Recipients and Clients may at any time make the decision to be notified about the receipt of cookies, as well as to block the respective entry in their system through the computer application that they use to navigate the Internet.

Concerning the type of purposes intended, SIMOLDES may, where appropriate, use three different types of 'cookies', according to the following specifications:

- I. **Essential «cookies»** - some “cookies” are essential for accessing specific areas of online channels, allowing the navigation and use of their applications, such as access to secure areas of the sites, through user registration - without these 'cookies', services that they require can not be provided;
- II. **Function «cookies»** - function “cookies” allow the record of user preferences for browsing on websites, so they do not need to reconfigure and customize it each time they visit;

- III. **Analytic «cookies»** - these "cookies" are used to analyze how users use the websites, allowing to highlight articles or services that may be of interest to the users, monitoring site performance, as well as knowing which pages are most popular, which connection method is most effective, or to determine why some pages are receiving error messages - these cookies are only used for the purpose of statistical creation and analysis without ever collecting personal information.

SIMOLDES can thus provide a high-quality experience to Users or Customers by personalizing information and offers and identifying or correcting any problems that may arise in the context of their use.

As for type of validity, there are two types of "cookies":

- I. **Permanent «cookies»** – cookies which are stored on the devices used to access the channels (computers, mobile phones, etc.) at the level of the computer application used for browsing the internet ("browser") and are used whenever Users or Clients visit any channel again - they are generally used to direct navigation according to the interests of the User or the Customer, allowing SIMOLDES to provide a more personalized service;
- II. **Session «cookies»** - temporary "cookies", which are generated and are only available until the end of the session. The next time the Client accesses the browser the cookies will no longer be stored – the information obtained allows to manage the sessions, identify problems and provide a better browsing experience.

Users and Customers may disable some or all of the cookies at any time - they must follow the instructions available in each of the computer software applications used for browsing the Internet, they may however with deactivation, lose access to some functionalities of the sites.

SIMOLDES, in the context of direct electronic communication channels, may also use "cookies" in the opening of the different electronic communications sent, such as newsletters and electronic mail, for statistical purposes - allowing to know if these communications were opened and check the clicks through links or adds sent within those communications.

Also in this category of cookies, Users and Customers always have the possibility to disable the sending of electronic communications through the specific option in the footer of the communication.

12 Communication of Data to Other Entities

The provision of information or the provision of services by SIMOLDES to its Users or Clients through channels may involve the use of services of subcontracted third parties, including entities established outside the European Union, for the provision of certain services, which may involve access by these entities to the personal data of Users or Customers.

In these circumstances and whenever necessary, SIMOLDES will only resort to subcontracted entities that present sufficient guarantees of execution of adequate technical and organizational measures in a way that the treatment meets the requirements of the applicable standards, being such guarantees formalized in a contract signed between SIMOLDES and each of these third entities.

13 Data Recipients

Except in the scope of compliance with legal obligations, in no case will there be any communication of personal data from Users, Recipients of the service or Customers to third entities that are not subcontracted entities or legitimate recipients, and no other communication is also carried out for other purposes than the mentioned above.

14 International Data Transfers

Any transfer of personal data to a third country or an international organization shall only be carried out within the framework of the fulfillment of legal or guaranteed obligations which are in conformity with the applicable Community and national legal rules in this regard.

15 Security Measures

Taking into account the most advanced techniques, application costs and the nature, scope, context and purpose of the treatment, as well as the risks of probability and variable gravity for the Users or Clients, SIMOLDES and all entities subcontracted by SIMOLDES shall apply the appropriate technical and organizational measures to ensure a level of safety appropriate to the risk.

To that end, a number of security measures are adopted to protect personal data against unauthorized disclosure, loss, misuse, alteration, processing or access, as well as against any other form of illegal treatment.

It is the sole responsibility of the Users, Recipients of the service or the Clients to keep the access codes secret, not sharing them with third parties, and in the particular case of computer applications used to access the channels, maintain and conserve the access devices in secure conditions and follow the security practices recommended by the manufacturers and / or operators, in particular regarding the installation and update of the necessary security applications, such as antivirus applications among others.

If there is a need to subcontract services to third parties that may have access to personal data of Users or Customers, SIMOLDES subcontractors will be obliged to adopt the security measures and protocols at the organization level and the necessary technical measures to the protection of the confidentiality and security of personal data, as well as to prevent unauthorized access, loss or destruction of personal data.

16 Exercise of Rights of Owners of Personal Data

Users and Customers of SIMOLDES may, as owners of personal data, at any time, exercise their rights of data protection and privacy, namely the rights of access, rectification, erasure, portability, limitation or opposition to processing, under the terms and limitations set forth in the applicable standards.

Any request for the exercise of data protection and privacy rights must be addressed, in writing, by the respective holder, to the Data Protection Office, according to the procedure and contact described below.

17 Complaints or Suggestions and Incident Reporting

SIMOLDES' Users and Customers have the right to submit a complaint either by registering the complaint on the site protecaodedados@SIMOLDES.com or by submitting a complaint to the regulatory authorities.

SIMOLDES' Users and Customers may also make suggestions through electronic mail sent to the Data Protection Office.

18 Incident Report

SIMOLDES has implemented an incident management system in the scope of data protection, privacy and information security.

If any User or Client wishes to report the occurrence of any situation of violation of personal data that causes, accidentally or unlawfully, the unauthorized destruction, loss, alteration, disclosure or access to personal data transmitted, preserved or otherwise treated, he or she may contact the Data Protection Office or use the SIMOLDES' general contacts described above.

19 Privacy Policy Amendment

In order to ensure its updating, development and continuous improvement, SIMOLDES may, at any time, make changes, which are considered appropriate or necessary, to this Data Protection and Privacy Policy, ensuring its publication in the different channels to guarantee its transparency and information to Users and Clients.

20 Express Consent and Acceptance

The terms of the Data Protection and Privacy Policy are complementary to the terms and provisions regarding personal data set forth in the General Conditions of Use of the SIMOLDES channels.

The free, specific and informed disclosure of the personal data by the respective owner implies the knowledge and acceptance of the conditions contained in this Policy, considering that, by using the channels or by making their personal data available, Users, Service Recipients and Customers are expressly authorizing their processing, in accordance with the rules defined in each of the channels or collection instruments applicable.

21 Data Protection Office

For the exercise of any type of data protection and privacy rights or for any subject related to the protection of data, privacy and information security, Users, Service Recipients and SIMOLDES Customers may contact the Office Data Protection through the electronic mail protecaodedados@SIMOLDES.com, describing the subject of the request and indicating an electronic mail address, a telephone contact address or a mailing address for reply.

