

## DVINE Privacy Police

Being aware of your concern regarding how we process your Personal Data, in DVINE / MEDINFAR we acknowledge the importance to safeguard your privacy.

We wish that our Clients are aware of the general rules regarding privacy and processing of data we collect, in strict compliance with the legislation applicable within this scope, namely with Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016 ("General Data Protection Regulation" or "GDPR"), with Law 67/98 – Data Protection Law, which implements into the Portuguese legal system Directive 95/46/EC, of the European Parliament and of the Council, of 24 October 1995, on the protection of natural persons regarding processing of personal data, in all which is not in opposition with the GDPR and until a new diploma is applicable, and with the guidelines issued by the National Data Protection Commission (the "NDPC").

Further to the above, this Privacy Policy describes which of your Personal Data are collected by us, how they are used, why they are necessary, and how the collection and processing of the same may benefit you or be of your interest. If you have any queries, need any clarification or wish to exercise any of your rights you may contact us here.

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## Personal Data

Pursuant to the General Data Protection Regulation, personal data ("Personal Data") means any information, regardless of the nature and respective support, including sound and image, relating to an identified or identifiable natural person ("Data Subject" or "Subjects"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.

### Which Personal Data are collected and processed?

By using our website, by contacting or requesting information on DVINE or from contacts that you may maintain with one of our collaborators or clients, we may collect the following Personal Data:

- a. Contact Personal Data, such as, the name, electronic mail address (e-mail), address, telephone numbers and professional category;
- b. Financial Information, such as tax number or payment forms;
- c. Technical Information, such as data on your visits to our website or regarding materials and communications sent by DVINE through electronic means;
- d. Data that you provide us for scheduling of meetings or attendance of events, including restrictions of accessibility;
- e. Browser information, webpages that you have accessed, date of access, location at the time of the access as well as the IP address.
- f. Any other data that you provide us.

Additionally, we may process Personal Data as to your preferences or interests through browsing in our Website. Such Personal Data shall only be used for the purposes of customisation of the products offered, as well as, of the commercial communications that we may send, in compliance with the contents below.

## How do we obtain your Personal Data?

DVINE / MEDINFAR collects and processes your Personal Data through various ways, namely by using our website and our services, specifically:

- a. When acquiring a DVINE product;
- b. Through our computer tools and applications, including our website and electronic communications sent to DVINE / MEDINFAR;
- c. When you provide the same to us or directly interact with us, namely through contacts with our collaborators;
- d. Through other means and sources, namely with recourse to means that provide information publicly in order to maintain your Personal Data up-to-date.

## How do we use your Personal Data?

We collect and process your Personal Data in order to be able to offer you an improved on-line experience, as well as, to provide a high-quality service to the client. Specifically, we collect, process, store and share your Personal Data with the following purposes:

- a. To maintain the relationship with the Data Subjects;
- b. To provide information that you request us;
- c. To verify the identity of the persons that contact DVINE by telephone, electronic means or other communication means;
- d. To know and assess the interests, preferences and changes of our Clients' needs, our current products and our services and/or to develop new products and services;
- e. To make available and improve our website, inclusively by auditing and monitoring its use;
- f. For internal training and quality-control purposes;
- g. To make opinion surveys and market studies;
- h. To comply with our legal and regulatory obligations and/or obligations regarding any commercial relationship established with you;
- i. For recruitment purposes.

Additionally, and provided that your consent has been given to us through choosing the field created for such purposes in our website, we may also process your Personal Data for commercial purposes, namely:

- a. Notwithstanding the last paragraph of this Section, when promoting our services and our cosmetics products, through sending of news and publications, newsletters and details of institutional events.
- b. Offer and provide information or publicity in social media or third parties' websites, in which you have registered, whenever you are the Subject of the same, and according to the legal conditions and privacy policies accepted by you at each time, or according to your privacy settings chosen in the said social media or third parties' websites. For that purposes, we may communicate your Personal Data to third parties, including your preferences and interests, with the purposes to provide adequate publicity.

With the consent requested in the previous item, it will be easier to ensure that the commercial information provided to you matches exactly what you are looking for.

You should take into account that, even if you do not give us your consent, you may find commercial information on DVINE in social media or third parties' websites, which results from the acquisition of publicity areas in the said platforms and according to the respective use rules, without implying any access by DVINE to your Personal Data.

If you are already a client of ours, DVINE / MEDINFAR may use your Personal Data for communication with direct marketing purposes of its own products or services which are similar to those sold. You may, however, decline that we do it if you click in the box below with the following contents: [  ] I do not wish that you contact me to inform me of the products or services offered by DVINE / MEDINFAR related with the products or services bought. You may also stop the sending of such communications, by clicking at the link "unsubscribe" located at the end of all communications that you receive within this scope.

#### Use of DVINE website

Several features of our website invite you to submit your Personal Data, such as "Newsletter Registration" at the page's foot. The purpose of these features is set out in the page and upon provision of your Personal Data, these will be used solely for the purposes for which have been submitted.

## Marketing and other e-mails

We collect and process your Personal Data in order to be able to contact you for purposes of provision of information on products that we market and activities in which we participate, through newsletters and other communications.

## Newsletters

The purpose of DVINE Newsletters is to disclose new products, news and information on initiatives of the brand DVINE, although we may create other newsletters with a more specific nature. Newsletters are of voluntary subscription, free of charge and for the period that the subscriber wishes. Access to our website is not, in any way, restricted to the subscription of the newsletter or processing of Personal Data. By sending each newsletter, we collect metrics that enable to identify which subscribers have opened and clicked on each link that may be included in the message that they have received.

## Events

We collect and process your Personal Data, whether as a result of your direct contact with us or by attending any event that DVINE organises or co-organises. We will only process special categories of Personal Data as eventual restrictions of accessibility in order to meet your needs and comply with any legal or regulatory obligation.

## Recruitment

We collect and process Personal Data that you provide us within the scope of a spontaneous application for job opportunities at DVINE. Given that such a communication is made by you in a spontaneous manner, such act is deemed by us as an express and unequivocal consent for processing Personal Data included in such communication, for recruitment purposes. In this event, DVINE/Medinfar undertakes to restrict access to the information shared by the applicant to those persons requiring it for the purposes of assessing such application.

## Contact Requests / Clarification Requests

Any parties interested in obtaining information or clarification requests regarding DVINE/Medinfar, as to our services or products may share Personal Data, whether through the site, or telephone contact or by e-mail. Personal Data will solely be used within the scope of the processes to which the same are aimed to.

### On what ground do we process your Personal Data?

DVINE / MEDINFAR processes your Personal Data based on the following grounds:

- a. By means of your specific consent;
- b. In diligences prior to formation of contracts or statement of contractual will, and in the execution of contractual obligations;
- c. To comply with regulatory and legal obligations;
- d. Whenever processing is necessary for the purposes of legitimate interests of DVINE/MEDINFAR;
- e. For legitimate commercial purposes.

### For how long do we store your personal Data?

DVINE / MEDINFAR processes and stores your Personal Data in view of the purposes for which they were processed, endeavouring the reasonable measures to ensure that your Personal Data are stored with accuracy and updated for the due purposes.

There are, nevertheless, cases where the law obliges the processing and storage of Personal Data for a minimum period of time, namely, for 10 years regarding data necessary to inform the Tax Authorities for accounting or tax purposes or data relating to corporate accounting, as well as for 7 years with the purposes to prevent money laundering and terrorism financing.

On the other hand, whenever there is no specific legal obligation, Personal Data shall be processed only for the period necessary to fulfil the purpose for which they were collected and stored and always in compliance with the law and the guidelines and decisions issued by the NDPC.

Within the scope of contractual relationships, DVINE / MEDINFAR will process your Personal Data during the period in which it maintains a contractual relationship with you. However, it may retain such Personal Data or others for higher periods than the contractual relationship based on your consent or to ensure the rights and obligations related with the contract, or due to legitimate interests that ground it, but always for the period strictly necessary for the achievement of the respective purposes.

Regarding video-surveillance of its premises, DVINE / MEDINFAR shall only keep the image records and respective Personal Data for the maximum term of 30 days.

### With whom do we share your Personal Data?

We may share your Personal Data with third parties, our subcontractors, including:

- Our professional auditors;
- Suppliers with whom DVINE / MEDINFAR engages certain support services, such as text processing, translations, copies, revision of documents;
- IT service providers;
- Marketing service providers;
- Entities engaged in the organisation of events or seminars or co-hosting the same.

These entities shall process the Personal Data according to instructions and on behalf of DVINE/Medinfar. DVINE/Medinfar requires from its subcontractors the compliance with a number of obligations, among which are included, the obligation to adequately protect your Personal Data ensuring the confidentiality of the same, and the prohibition to use such data to any other purposes other than those mentioned in this Privacy Policy.

Whenever necessary, or for the reasons set out herein, Personal Data may also be shared with regulatory authorities, courts, and official entities. We will endeavour reasonable efforts to notify you prior to such disclosure, unless we are legally obliged not to do so.

We may also share your Personal Data with companies of the MEDINFAR Group or other entities, ensuring that we only share them with entities that protect your Personal Data and which comply with the privacy provisions similarly or as DVINE does. Communication of Personal Data to such entity shall also be made to optimise the services of MEDINFAR Group and for legitimate interests of the entities that compose the same.

Furthermore, as previously stated, we may communicate your Personal Data to third parties' websites or social media, to render easier the use of our platforms, as well as to provide information on DVINE that may be of your interest. We will not, in any way, integrate information obtained through such third parties without the consent of the Data Subject.

Your Personal Data may not be shared, sold, rented nor disclosed by any other form than the one foreseen in this Privacy Policy or in the information provided at the time that your Personal Data were collected.

## How do we protect your Personal Data?

We use a set of appropriate technical and organisational measures to protect your Personal Data against destruction, loss, change, disclosure and non-authorized access

These measures include, for instance, the implementation of safeguards, use of firewalls and secure servers, and encryption of information.

### Website

Personal Data collected through DVINE / MEDINFAR website are communicated over the Internet network under the security protocol SSL. This type of communication is not inviolable, but currently corresponds to good market practices. Additionally, Personal Data are stored in databases managed by DVINE/Medinfar in an encrypted manner, being made periodic backups of the data, in order to minimize the possibility of information losses in the event of default of the storage system.

Upon a violation of the security systems which results in a confirmed non-authorized use by third parties of your Personal Data, besides all further regulatory obligations that we must comply with, we will inform you by e-mail thereof.

## To which countries do we transfer your Personal Data?

Transfer of your Personal Data to countries outside Portugal may be necessary.

Accordingly, DVINE / MEDINFAR may have to transfer your Personal Data to a third country outside the Economic European Area ("EEA") and which does not integrate the list of countries that the European Commission has already considered to have adequate levels of data protection. In such events, DVINE / MEDINFAR will ensure that the transfers of Personal Data will be made in strict compliance with the applicable legal rules and that observe certain guarantees, namely:

- a. Standard Contractual Clauses approved by the European Commission. These standard clauses render sufficient guarantees that the proper and security requirements established by the GDPR are met; or,
- b. Certifications that show that the third countries located outside the EEA process Personal Data in compliance with the General Data Protection Regulation. These certifications are approved both by the European Commission as well as by a competent supervisory entity or also by a national body with competent accreditation for the purposes, according with the contents of the GDPR.

## Your Rights

Pursuant to the applicable legislation, you have the following rights regarding processing of your Personal Data:

### I. Right of access to Personal Data and to their rectification

The Data Subject has the right to obtain confirmation as to whether or not personal data concerning him or her are being processed and, where it is the case, access to the Personal Data as well as to information concerning the purposes of processing, categories of Personal Data concerned, the recipients of Personal Data, foreseen period in which the Personal Data will be stored, also having the right, at any time, to rectify or update the same.

### II. Right to Personal Data portability

The Data Subject has the right to the portability of his/her Personal Data. This means that the Personal Data may be transferred, copied or electronically transferred. However, this right is only verified whenever consent has been given for the processing of Personal Data; or for the execution of contract and the processing is carried out by automated means.

### III. Right to erasure of Personal Data ("right to be forgotten")

The Data Subject is entitled to request erasure of his/her Personal Data, without undue delay when, namely, the Personal Data are no longer necessary in relation to the purpose for which they were collected or processed; upon withdrawal of the consent on which the processing is based and where there is no other legal ground for the processing; when the Data Subject objects to the processing of Personal Data for direct marketing purposes and in all further cases foreseen in the General Data Protection Regulation.

Whenever the Personal Data are no longer necessary for any purposes or there is no legal ground requiring their storage, we will endeavour our best efforts to erase them or permanently make the data anonymous.

### IV. Right to restriction of processing

The Data Subject has the right to restrict the processing of his/her Personal Data if, namely, considers that the Personal Data collected are not accurate, that the same are not being processed in accordance with the applicable legal provisions, being

able to oppose to the erasure of the Personal Data and request restriction of their use instead, within the scope of legal claims and all further cases foreseen in the applicable legislation.

## V. Right to object

The Data Subject has the right to object, at any time, to processing of Personal Data concerning him or her. Where Personal Data are processed for direct marketing purposes or other marketing means, the Data Subjects may object at any time without the need of any justification thereof.

## VI. Right of not being subject to automated individual decision-making

The Data Subject has the right of not being subject to a decision based solely on automated processing of his/her Personal Data, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

## Exercise of Rights

Further to the above, you may request, at any time, access to your Personal Data, as well as their rectification, erasure or restriction to processing, the portability of your Personal Data or object to processing (with the exception to those Personal Data strictly necessary for the provision of the services), through written request, by e-mail to the address [dpo@medinfar.pt](mailto:dpo@medinfar.pt), with a reference to "Privacy", alternatively, through sending of a registered letter to the address of the Controller, or in the case of the Newsletter, by clicking in the field "unsubscribe" placed at the end of the publication, being, therefore, excluded from the mailing list.

We highlight that such withdrawal of the consent does not render invalid the lawfulness of any processing made until then.

Exercise of the rights is, as a rule, free of charge, unless it concerns a request clearly ungrounded or excessive, case in which it may be charged a reasonable rate considering the costs spent with the request.

Information must be given in writing, although, if requested, may be given verbally. In this case, DVINE / MEDINFAR must verify your identity by other means other than verbal means.

Response to requests shall be given, as a rule, in a maximum term of 30 days, unless it concerns a rather complex request or a multiplicity of requests.

Notwithstanding any other means of administrative or judicial recourses, the Data Subject is entitled to submit a claim before the NDPC, when it considers that his/her Personal Data are not being lawfully processed by DVINE / MEDINFAR, according to the applicable legislation and this Privacy Policy.

## Data Controller

The Controller is the public limited liability company Laboratórios Medinfar, S.A., corporate person number 500 384 045, with head office at Rua Manuel Ribeiro de Pavia, nº 1, 1º, Venda Nova 2700-547, Amadora, who, in such capacity, decides which are the Personal Data collected, processing means and purposes for which the Personal Data are used.

## Data Protection Officer

DVINE/Medinfar appointed a Data Protection Officer ("DPO") with the following contacts:

Pedro Simões Dias

▶ [dpo@medinfar.pt](mailto:dpo@medinfar.pt)

▶ Edifício Europa, Avenida José Malhoa, 16, Piso 2 - B2 1070-159 Lisboa, Portugal.

## How to Contact Us?

If you have any queries, require any clarification, have any suggestions or any claim regarding this Privacy Policy or the processing of your Personal Data, please contact us through the electronic mail address [dvine@dvineskin.pt](mailto:dvine@dvineskin.pt), making a reference to "Privacy".

This Privacy Policy may be subsequently amended,  
which will be reflected in this document.

*(Last Update: 29/11/2018)*