

PRIVACY POLICY

VITACRESS PORTUGAL S.A. (hereinafter, VITACRESS), with headquarters at Quinta dos Cativos, Boavista dos Pinheiros, 7630 – 033 Odemira and Corporate Taxpayer no. 501559639, is the domain proprietor of *vitacress.pt*, which hosts its WEBSITE, being liable for the data processing performed through it.

VITACRESS IS COMMITTED TO PROTECT THE PRIVACY AND PERSONAL DATA OF ITS CUSTOMERS AND WEBSITE USERS, AND HAS, THUS, PREPARED AND ADOPTED THE POLICY AND THE PRACTICES DESCRIBED HEREIN.

THIS PRIVACY POLICY EXPLAINS HOW YOUR PERSONAL DATA IS COLLECTED AND PROCESSED, SO WE RECOMMEND ITS READING TO KNOW THE CONDITIONS IN WHICH YOUR PERSONAL DATA IS COLLECTED AND USED.

1. WHAT IS THIS POLICY ABOUT?

1.1. This Privacy Policy explains how we collect and process your personal data that is necessary for the provision of services available through the WEBSITE, outlining the practices adopted for the purpose.

2. WHAT IS PERSONAL DATA?

- 2.1. Personal data is any information that relates to an identified or identifiable person, regardless of nature and information medium, including sound and image.
- 2.2. Examples of personal data we collect are your name, email and telephone number when you get in touch with us through the contact form, or cookies and IP address when you visit our website.
- 2.3. Identifiable is understood as a person that can be identified, directly or indirectly, in particular by reference to an identification number or other specific elements of his/her physical, physiological, mental, cultural or social identity.

3. HOW ARE WE GOING TO USE YOUR PERSONAL DATA?

- 3.1. VITACRESS will use your personal data provided to us for the following purposes:
 - (a) To review and reply to your messages, customer support and information requests;
 - (b) To keep a record of your contact details;
 - (c) To manage WEBSITE operations;
 - (d) To fulfill business purposes, such as data analysis, audits;
 - (e) To prevent frauds and systems security information;
 - (f) To adapt, improve and change services, namely through the identification of trends of use, or to determine the effectiveness of promotional campaigns.
- 3.2. These personal data processing operations are a key tool to ensure your satisfaction and for VITACRESS's activity, and are performed in compliance with the applicable legislation and pursuant to the best practices.

3.3. Your personal data will not be reused for other purposes than those listed herein or that have no relation to those purposes for which they were initially collected.

4. WHAT ARE THE GROUNDS FOR PROCESSING THE PERSONAL DATA COLLECTED?

4.1. Personal data processed by VITACRESS has specific grounds, depending of the purposes for which they are intended.

4.2. The following table depicts the grounds according to the purposes identified above:

PURPOSE	GROUND
To review and reply to your messages, customer support and information requests.	Consent for that particular purpose.
To keep a record of your contact details.	Consent for that particular purpose.
To manage WEBSITE operations.	Consent for that particular purpose (cookies).
To fulfill business purposes, such as data analysis, audits.	Consent for that particular purpose (cookies); Legitimate interests pursued by VITACRESS.
To prevent frauds and systems security information.	Consent for that particular purpose (cookies).
To adapt, improve and change services, namely through the identification of trends of use, or to determine the effectiveness of promotional campaigns.	Consent for that particular purpose (cookies); Legitimate interests pursued by VITACRESS.

5. WHAT PERSONAL DATA DO WE COLLECT?

5.1. VITACRESS collects and processes only the personal data necessary and appropriate for the above mentioned purposes.

5.2. VITACRESS will collect and process the following personal data:

PURPOSE	DATA
To review and reply to your messages, customer support and information requests.	Name, email and telephone number.
To keep a record of your contact details.	Name, email and telephone number.
To manage WEBSITE operations.	Cookie data.
To fulfill business purposes, such as data analysis, audits.	Cookie data.
To prevent frauds and systems security information.	Cookie data; IP address.
To adapt, improve and change services, namely through the identification of trends of use, or to determine the effectiveness of promotional campaigns.	Cookie data.

6. HOW DO WE COLLECT YOUR PERSONAL DATA?

- 6.1. We will collect your personal data via forms present on the WEBSITE, but also through the WEBSITE and the communication it establishes with your device and e-mail messages you submit to us.
- 6.2. Your personal data is collected via your device as follows:
 - (a) Through your browser;
 - (b) Through cookies;
 - (c) IP address.
- 6.3. VITACRESS undertakes the commitment of processing your data in compliance with the law and legitimately.
- 6.4. VITACRESS will not sell, nor lease nor share your personal data to any third party, except in cases clearly identified in this Privacy Policy (refer to Point 17 for further information).
- 6.5. VITACRESS services are not directed to persons' underage, and the personal data of minors is not intentionally processed.

7. WHAT ARE COOKIES?

- 7.1. Cookies are small text files that help to identify your browser and which may store information, per example, User settings and preferences.
- 7.2. VITACRESS will store cookies in your device to customize and to facilitate browsing, and also to solve problems, statistics, quality assurance, and to monitor system security.
- 7.3. With the exception of cookies specifically necessary for the performance of the website, enabling other cookies is always subject to the approval and consent of the User, and this consent may be revoked at all times through specific browser tools.

8. HOW DO WE USE COOKIES?

- 8.1. We use cookies to display your preferences, per example:
 - (a) Cookies allow us to know if you enabled (or not) the use of cookies on the WEBSITE;
 - (b) Cookies allow us to identify you as a recurrent User;
 - (c) Cookies allow us access to you customized preferences whilst browsing;
- 8.2. Cookies allow us to collect, anonymously, statistics regarding videos you watched on the WEBSITE.

9. THIRD-PARTY COOKIES

- 9.1. Some cookies may, also, be stored by third-parties other than VITACRESS.
- 9.2. These third-parties are service providers, and although VITACRESS makes all efforts to use only service providers that provide guarantees for the use of appropriate technical and organizational measures and in compliance with the requirements of the relevant data protection legislation, and the User acknowledges that VITACRESS is not liable for the content and accuracy of the privacy and cookie policies of these third-parties.
- 9.3. Point 12 lists all cookies used, including those by third-parties.

10. WHAT ARE COOKIES USED FOR?

- 10.1. VITACRESS will store cookies in your device to customize and facilitate browsing, but also, to solve problems, statistics, quality assurance, and to monitor system security.
- 10.2. You may, at any time, delete or disable said cookies, and when doing so, some features of this WEBSITE may not work as intended.
- 10.3. Cookies are not used for any purpose other than those described herein.

11. TYPES OF COOKIES.

- 11.1. At our WEBSITE, cookies are used for different purposes, but, in general, their use can be divided in the following categories:
 - (a) **Strictly Necessary Cookies:** are those cookies which are essential for the provision of the WEBSITE and for all services requested, but do not perform any additional or secondary functions.
 - (b) **Performance Cookies:** are those cookies that provide statistical information about the use of the WEBSITE, that is, web analytics.
 - (c) **Targeting/ Advertising Cookies:** are those cookies used to create profiles or customize content.

12. COOKIES WE USE.

12.1. The following table explain how we use cookies on this WEBSITE.

Performance Cookies			
Origin	Name	Description	Term
<i>First-Party (vitacress.pt)</i>	<i>_ga</i>	<i>Google Universal Analytics Cookie used to distinguish users.</i>	<i>730 days</i>
<i>First-Party (vitacress.pt)</i>	<i>_gid</i>	<i>Cookie created by Google Analytics and used to distinguish users.</i>	<i>24 hours</i>
<i>Third-Party (vimeo.com)</i>	<i>player</i>	<i>Cookie created by Vimeo and used to distinguish users.</i>	<i>365 days</i>
<i>Third-Party (vimeo.com)</i>	<i>vuid</i>	<i>Cookie used for video hosting/sharing.</i>	<i>730 days</i>

Targeting/Advertising Cookies			
Origin	Name	Description	Term
<i>First-Party (vitacress.pt)</i>	<i>_gat_gtag_xxxxxxxxxxxxxxxxxxxxxxxxxxxxx</i>	<i>Cookie used by Google Analytics for marketing purposes.</i>	<i>2 years</i>

13. COOKIES CONTROL AND MANAGEMENT.

- 13.1. At all times you can control and/or disable cookies; you can delete all cookies already stored in your device; and you can set most browsers in order to prevent them being stored.
- 13.2. In order for you to manage this, however, you will have to manually adjust some preferences each time you visit certain websites, and without these some services and functionalities may not work.

13.3. As an additional guarantee you can, at all times, disable cookies by setting your browser, according to the instructions available at:

- (a) For Google Chrome users: <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>
- (b) For Internet Explorer users: <https://support.microsoft.com/pt-pt/help/17442/windows-internet-explorer-delete-manage-cookies>
- (c) For Microsoft Edge users: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- (d) For Mozilla Firefox users: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- (e) For Apple Safari users: <http://support.apple.com/kb/ph5042>

14. HOW DO WE PROTECT YOUR PERSONAL DATA?

- 14.1. Your personal data is kept safe through the adoption of several, technical and organizational, security measures which ensure that only Employees dully authorized will have access to personal data, in compliance with the norms established for this purpose.
- 14.2. To protect your personal data, we only use data center providers that offer us adequate and documented security measures, namely, guarantees that your personal data is stored in servers kept in controlled environments with limited access.
- 14.3. Likewise, when browsing our WEBSITE, your data is protected with encryption, such as Transport Layer Security (TLS, a data security protocol for communications over the internet).
- 14.4. Although we adopt all care and precautions deemed appropriate to protect personal data provided and collected, you must be aware that no security system is impenetrable.

15. FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

15.1. Your personal data is retained for as long as necessary for the purposes for which they are intended, as listed in this Privacy Policy. Therefore:

PURPOSE	MAXIMUM TIME
To review and reply your messages, customer support and information requests.	1 year.
To keep a record of your contact details.	1 year.
To manage WEBSITE operations.	2 years.
To fulfill business purposes, such as data analysis, audits.	2 years.
To prevent frauds and systems security information.	2 years.
To adapt, improve and change services, namely through the identification of trends of use, or to determine the effectiveness of promotional campaigns.	2 years.

15.2. If the law determines a specific or mandatory retention period, the data will be retained according to this period. In all other cases, personal data will be kept during the maximum time indicated above, periods which VITACRESS considers sufficient to fulfill the purposes.

15.3. After the retention period, all personal data collected will be deleted.

16. HOW CAN YOU EXERCISE YOUR RIGHTS:

16.1. Before explaining how you can exercise your rights, you should know what they are. As such, the law grants you the right of requesting us the exercise of the following rights:

- (a) Access: the right to obtain confirmation about your personal data being, or not, processed, and, if that is the case, the right to access your personal data;
- (b) Rectification: the right of rectifying inaccurate personal data concerning you, and to dully complete your personal data;
- (c) Deletion: the right to have your personal data deleted when one of the reasons set forth by law is applicable;
- (d) Processing limitation: the right of limiting processing if one of the reasons set forth by law is applicable;
- (e) Opposition: the right of opposing, at all times, to the processing of personal data concerning you;
- (f) Portability: the right to receive personal data concerning you in a structured, commonly used and automatic reading format.

16.2. You have also the right of submitting a claim to the competent control authority (in Portugal, the National Data Protection Commission at www.cnpd.pt).

16.3. For the purpose of exercising the rights above indicated, you should contact VITACRESS via email: info.cliente@vitacress.com.

16.4. If you request us to delete some, or all, of your personal data, some services requested may not be provided and VITACRESS will retain only the necessary personal data to meet statutory obligations to which it is bound.

17. WHEN DO WE COMMUNICATE YOUR DATA TO A THIRD-PARTY?

17.1. VITACRESS may use third-parties to provide certain services, in terms of maintenance, technical support, marketing, invoicing or payment management, and these may have access to some personal data, namely, data necessary for the contracted purposes.

17.2. VITACRESS ensures that the entities having access to the data are credible and offer high protection standards, and will never be transmitted data beyond what is necessary for the provision of the contracted service, and, nonetheless, VITACRESS remains responsible for the personal data provided.

17.3. VITACRESS may also communicate your data to the following entities:

- (a) Companies partaking in the business group to which VITACRESS belongs (RAR Group) and with whom it has commercial partnerships to create and offer benefits; or yet,
- (b) Other partners outside its business group (subject to your previous consent).

17.4. VITACRESS may also transmit data to third-parties in the scope of researches, inquiries and judicial proceedings and/or administrative proceedings or or similar nature, provided that it is duly ordered by a court order.

18. THIRD-PARTY WEBSITED.

- 18.1. The WEBSITE may contain links to other websites, which may collect and process your personal data and this treatment is the sole responsibility of those websites proprietors, and VITACRESS is not responsibly of any of their policies and/or practices.
- 18.2. Examples of these third-parties are *Facebook, Instagram, LinkedIn* and *Youtube*, available through buttons present on the WEBSITE.

19. TRANSFFER OF DATA OUTSIDE THE EUROPEAN UNION.

- 19.1. In the event of personal data being transferred to third countries outside the European Union, VITACRESS will comply with the statutory norms, namely with regard to the suitability of the recipient country in relation to personal data protection and the requirements which are applicable to these transfers, and personal data will not be transferred to jurisdictions that do not offer guarantees in terms of security and protection.

20. UNDERAGE.

- 20.1. The WEBSITE is not directed to persons under the age of 16, so we ask that these minors do not provide us with personal data through the WEBSITE, app, social networks and social media or emails.
- 20.2. VITACRESS undertakes the commitment to protect children's need for privacy, encouraging their parents and guardians to take an active role in their activities and interests developed by them online.

21. SENSITIVE PERSONAL DATA.

- 21.1. VITACRESS asks you to not submit any sensitive personal data, that is, information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union associations, genetic information, biometrical information, data relating to the sexual life of a natural person or sexual orientation.
- 21.2. If you do decide to submit such personal data categories to us, they will be immediately deleted.

22. CHANGES TO THE PRIVACY POLICY.

- 22.1. VITACRESS reserves the right of adjusting or changing the current Privacy Policy, at any point, and such changes will be disclosed.

23. OUR CONTACT DETAILS.

- 23.1. If you have any doubt or question related to the Privacy Policy, please get in touch using the email: info.cliente@vitacress.com.

24. LATEST VERSION.

June 2nd of 2020. Odemira (Portugal).