

**CODE OF CONDUCT**  
**IN THE FIELD OF DATA PROTECTION**  
**OF THE COMPANY JIMPISOFT SOCIEDADE DE**  
**DISTRIBUIÇÃO DE PRODUTOS DE MICRO INFORMÁTICA,**  
**LDA.**  
**NIFPC 501919678**

**I. IDENTIFICATION OF THE ENTITY AND GENERAL FRAMEWORK**

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- 1) The security and confidentiality of the relationship with the customer are, more than a legal dictate, a commitment of honor of Jimpisoft Sociedade de Distribuição de Produtos de Micro Informática, Lda, (Jimpisoft) its professionals and collaborators, which we intend to respect , also in the matter of the Collection, Treatment and Protection of Personal Data, complying with the applicable legal regulations.
- 2) To ensure the security and confidentiality of our business relationship and compliance with applicable law, Jimpisoft has decided to adopt this Code of Conduct regarding the Collection, Processing and Protection of Personal Data.

**II. OBJECT**

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This Jimpisoft Code of Conduct is intended to adapt and implement the General Data Protection Regulation (hereinafter referred to as GDPR) and other applicable legislation regarding the collection and processing of personal data held in this company.

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The Code of Conduct adopted establishes internal principles and rules with the purpose of guaranteeing the protection of the personal data of the singular persons, customers of this company, as well as any partners or employees from whom it has obtained any personal data, within its activity, all with compliance with the legislation in force.

### **III. SCOPE OF APPLICATION**

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This Code of Conduct applies to all employees of the company and binds them to each other, before all customers and other partners with whom this company has business relations.

### **IV. PRINCIPLES AND GENERAL RULES**

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The personal data collected will be dealt with lawfully, legally and transparently in relation to the data subject.

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The personal data processed by this company will be obtained, preferably but not exclusively, by obtaining the prior consent of the data subject, and such consent must be given as a free, specific, informed and explicit expression of wishes by which the owner of the data accepts, by declaration, or unequivocal positive act, that the personal data concerning him / her are subject to treatment.

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Personal data are collected only for the purposes resulting from the activity of this company and cannot be treated in a way incompatible with these purposes.

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The personal data are accurate and updated as necessary, and all appropriate measures are taken so that inaccurate or unnecessary data, taking into account the purposes for which they are processed, are erased or rectified without delay.

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Personal data shall be kept in a form which enables the data subjects to be identified only when necessary and for the period necessary for the purposes for which they are processed

Personal data are treated in a way that guarantees its security, including protection against its unauthorized or unlawful processing and against its accidental loss, destruction or damage, by adopting appropriate technical and / or organizational measures.

1. The controller shall take appropriate technical and organizational measures to ensure that only the personal data necessary for each specific purpose of the processing are processed.
2. The technical and organizational measures adopted shall be in accordance with the volume of personal data collected, the extent of its processing, the shelf life and accessibility.
3. Except with the express consent of the data subject and contractual or legal obligations, these measures shall ensure that personal data are not made available to third parties.

## **V. CONCEPTS AND TERMINOLOGY**

1. DPO is the data protection officer of this company;
2. The data subject is the identified or identifiable natural person to whom the personal data information refers.
3. Personal data for the purposes of this code of conduct shall be any and all information relating to an identified or identifiable natural person - the data subject.
4. Personal data, such as the name, the civil and / or tax identification number and the social security number, the bank details, the address, telephone or electronic contacts and any other data, as well as any other data specific economic, financial, cultural or social identity of that relevant natural person.
5. The collected data file shall be any structured set of personal, physical or digital data accessible to specific criteria, whether centralized, decentralized or distributed in a functional or geographical manner.

6. Personal data for the purposes of this Code of Conduct will not be considered personal data and under the applicable legislation, the registration number of companies and other collective entities; the general e-mail addresses of companies and other collective entities; and other data that by themselves or together do not provide or enable the identification of a particular natural person.

## **VI. IDENTIFICATION OF DATA COLLECTED**

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This company may obtain and process the following data in the scope of labor relations, professional and for the purpose of complying with legal obligations, such as tax, social security and labor:

- (a) biometric resulting from a specific technical treatment relating to the physical, physiological or behavioral characteristics of a natural person enabling or confirming the unique identification of that natural person, in particular facial or dactyloscopic data;
- (b) relating to health, related to the physical or mental health of a natural person, including the provision of health services, which reveals information on his or her health;
- (c) details of their trade union membership;
- (d) details of the composition of their household and their socio-economic status, including name, taxpayer number, social security number, citizen's card number, address and contacts.

The company will collect and deal with, among others, in the commercial relationship that it has with its customers, all necessary and relevant data for the purpose of rendering the services and commercialization of this company's products, as well as the customer identification data for the purpose of billing and fulfillment of legal and / or contractual obligations, namely the name, the civil and / or tax identification number and social security number, bank and insurance details, your address, your telephone or electronic contacts, and any other details specific to the economic, financial, cultural or social identity of that singular person.

Contact information will also be collected for the purpose of exchanging information and professional or other correspondence, which may include promotional and marketing campaigns to be developed by the company.

The company will collect and process the identification data of its suppliers and other partners for the purposes of billing and compliance with legal and / or contractual obligations, such as name, taxpayer's number, address and contacts.

The company may use the data of the various purposes identified herein in a cumulative and complementary manner, whenever necessary in view of the quality of the service provided and avoiding duplication thereof.

## **VII. ADOPTED MEASURES AND GUARANTEES**

The personal data collected and treated by the company are duly forbidden in its access to third parties and / or unauthorized persons, through:

- a. restriction of access to physical files of protected personal data;
- b. restriction of access to the computer database and data in digital format, with the adoption of additional measures of computer protection.

The company, in case of violation of the measures adopted to protect the collected and treated data, undertakes to communicate, within the legal period and from the knowledge of such breach and without prejudice to inform the competent authorities, if justified, to the holder of the data collected.

### **VIII. DURATION OF MAINTENANCE OF DATA COLLECTED**

The personal data collected will be maintained, except for a legal obligation in a different sense during the contractual relationship and the consequent fulfillment of all contractual obligations.

### **IX. IDENTIFICATION OF ENTITIES WITH ACCESS TO PERSONAL DATA**

In addition to the DPO identified below and without prejudice to compliance with legal obligations, they may have access to personal data collected by the company, those responsible for its administrative services and other professionals providing accounting services, as well as subcontracted entities and professionals that guarantee the compliance with the law applicable to the processing of such personal data, including:

- a) Public Authorities;
- b) Accounting services;
- c) Legal services;
- d) Computer services;
- e) Companies and professionals providing various services necessary for the pursuit of the services provided and sale of products by the company.

## **X. DATA HOLDER RIGHTS**

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The information, communications and rules, for the exercise of the rights of the data owners, shall be guided by transparency, privileging a communication carried out in a concise, transparent, intelligible, accessible and with clear and simple language.

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When the personal data is collected from the holder, the company will, upon request and whenever applicable, provide the following information:

- a) Identity and contact details of the controller and their representatives and / or their DPO, where applicable;
- b) Categories of data to be treated;
- c) Type of treatment to be performed;
- d) Purpose of the treatment to be performed, including, where appropriate, the definition of profiles;
- e) What is the legal basis for treatment, including:
  - a. Consent;
  - b. Contractual or legal requirement;
  - c. Whether it is a requirement to be party to a contract;
  - d. Legitimate interest.
  - Also indicating whether the provision of data is mandatory, as well as the consequences of not submitting it.
- (f) In the case of assignment or transmission of data, identification of recipients or categories of recipients;
- (g) Where applicable, identification of the intention of the controller to transmit data to and from the third country or international organization, as well as applicable legal framework and existing safeguards.
- (h) The period for which the data will be kept or, if this is not possible, the criterion to determine it.
- (i) The right to request the data controller to access, rectify and / or erase data or to restrict processing, as well as the right to portability and the right to withdraw consent without affecting the lawfulness of the treatment previously performed.
- (j) the right to complain to the supervisory authority.

(k) the existence of automated decision-making processes, including profiling, and relevant information on the logic of the process and the consequences for the data subject.

(l) Identification of who, besides the interlocutor, has access to personal data.

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The data holder has the right to obtain confirmation from the controller that the personal data concerning him or her are processed.

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The data collected for a particular purpose cannot be treated in a way incompatible with the same purpose, except in the cases provided for in the legislation in force and in this Code.

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The data holder may require rectification and / or restriction of treatment, as well as the right to portability and the right to withdraw consent without affecting the lawfulness of the treatment previously performed

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The holder of the personal data can, at any moment, having the right to be forgotten, requesting the destruction of his personal data.

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The destruction of data referred to in the previous clause can only operate in cases where there is valid reason for the request and in cases in which there is no legal obligation to keep the data on file. If there is a legal obligation to keep such data on file, the company undertakes to destroy it at the end of the legally required period.

## **XI. DPO**

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The data controllers are Mr. José Menau and Paulo Margalho who are contactable at [info@jimpisoft.pt](mailto:info@jimpisoft.pt).