



Privacy Policy

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SMC – Therapeutic Health Center Production LDA (hereinafter referred to as “we”, or “SMC”) is the “Responsible for Handling” all personal information collected and used about its customers.

SMC is committed to complying with legislation of protecting personal data and keeping the privacy of its customers, we take our responsibility for the security of their information very seriously. We will be clear and transparent about information that we collect and what we will do with that information.

This Policy aims to inform and explain the following points:

- a) Which entity is responsible for collecting your personal data;
- b) What personal data we collect and process about you and your relationship with us as a customer;
- c) What we do with this data;
- d) If and under what conditions SMC may disclose your personal data to other entities;
- e) How we comply with data protection rules;
- f) How we treat your data protection rights;
- g) What are *cookies*, how SMC uses them and how it can manage your preferences regarding them;
- h) SMC technical and security measures to try to guarantee the customer the protection of their personal data against unauthorized access, alteration, or destruction.

All personal data is collected and processed in accordance with Portuguese and EU data protection laws.

1. Who we are

SMC – Therapeutic Health Center Production LDA (with the trade name “SMC”), headquartered at Lugar do Barreiro, Rua 1 “A”, N° 2 and postal code 4730-460 Vila de Prado - Braga, Portugal, registered at the Commercial Registry Office of Braga under the registration number and Corporate Person identification 515 108 286, is responsible for operating the following website www.smc.pt.

2. Collection and processing of personal data

Personal data refers to any information relating to the customer that allows us to identify him, such as name, taxpayer number, citizen's card number, telephone number and address.

We understand that we may collect the customer's personal data when the customer gives us their consent or asks us to prepare a quote via email or by filling out the form that we make available on our website.

SMC understands that it can collect the following categories of information:

- a) Name, address, email address, telephone number;

- b) Advanced information about the customer, which includes their name, nationality, gender, passport or identification card number, as well as the respective taxpayer number;
- c) The communications that the customer exchanges with us or sends to us via letter, email, chat service, calls and social networks.

The personal data are collected and necessary to ensure the identity of the customer, providing the data requested when filling out budget documents or on our website by filling out the form provided. In the act of registration, the information that the customer make available to us is intended to provide a service more appropriate to their characteristics and needs. We will process the customer's personal data in our legal database to do this. In most cases, we will have to process the customer's personal data so that we can do our contract with him.

Customer data can be used for the following purposes:

- a) Provide products and services that you request: we use the information you provide us to perform the services that you request;
- b) Contact the client in the event of a change of delivery time or a cancellation thereof, as well as to monitor the order;
- c) For administrative and legal purposes: we use customer data for customer surveys, necessary records, and development, or to deal with a dispute or complaint. Any profiling activity will only be carried out with the prior consent of the customer and making every effort to ensure that all data on which the profile is based is accurate. By providing any personal data, the customer explicitly agrees that we may use it to carry out profiling activities in accordance with this Privacy Policy.
- d) Customer Services Communications: We use your data to manage our relationship with you as our customer and to improve our services and enhance your experience with us.

Under the terms and above-mentioned purposes, SMC may contact you for the following reasons:

- a) In relation of any service or online content that you have requested by filling out the form, to ensure that SMC can provide the services in question;
- b) To invite you to participate in surveys about SMC services (participation will always be voluntary);
- c) To inform you of any relevant changes to SMC policies and practices.

All processing of personal data carried out by SMC is lawful and has a legal basis, namely:

- i. Based on your consent to processing personal data in question for the respective purposes;
- ii. Because the processing in question is necessary for the execution of a contract in which the customer and SMC, as the holder of the personal data, are parties, or for pre-contractual procedures at the request of the titular of the personal data in question;
- iii. Because the treatment is necessary for the purpose of the legitimate interests pursued by SMC, as the person responsible for the treatment, or by third parties.

3. Preservation of personal data

SMC will retain your personal data if your registration is active or as necessary for the relevant activity, while as necessary of provide the services. We must consider the periods during with we may need to retain personal data to fulfill our legal obligations or to respond to complaints, requests for clarification on other necessary matters.

If you want to change your personal data or request that they no longer be processed by SMC, you can contact us via the following email: info@smc-thc.com or by letter to SMC – Therapeutic Health Center Production LDA, Lugar do Barreiro, Rua 1 “A”, N° 2 and postal code 4730-460 Vila de Prado - Braga, Portugal.

You always have the option to, at any time, terminate your relationship with SMC, however if you terminate your relationship with SMC, your personal data will be deleted without undue delay, with exception of your personal data that may or should continue to be processed by SMC for other purposes – referred above, under the respective legal basis and always considering the applicable personal data protection legislation.

When we no longer need the costumer’s personal data, we will safety delete or destroy them, informing the costumer for this process. We will also take in account whether and how, over time, minimize the personal data that we use, and whether we may anonymize the costumer’s data so that we can’t be associated with or identity you.

4. Sharing costumer personal data

The provision of information or services by SMC to its customers may imply the use of subcontracted third-parties services involving the processing of their personal data, including entities established outside the European Union or the European Economic Area, which may imply access by these third parties to your personal data.

In these circumstances and when necessary, SMC will only use subcontracted entities that present sufficient guarantees to carry out the technical and organizing measures so that the processing in question complies with the requirements of the applicable personal data legislation with the level of security adequate to the risk and sensitivity of the personal data in question and such guarantees and obligations of the subcontractor will be established by a contract signed for this purpose between SMC and each of these third-parties.

SMC may have to transfer personal data collected to a third country outside the European Union (“UE”) and not included in the list of countries that UE has already considered to meet adequate levels of personal data protection. In such cases, SMC will ensure that such transfers of personal data are carried out with strict compliance with the applicable legal standards for the protection of personal data, namely those arising from the General Regulation on the Protection of Personal Data (“RGPD”).

We may also share the costumer’s personal data with the following third parties for the purposes described in this Privacy Policy:

- a) Reliable services providers that we use to manage our activity, the “call centers” that provide support to our customers.
- b) Lawyers and other professional advisors, courts, and police forces in all countries where we operate, to enforce our legal rights in relation to our contract with the client.

5. Security of your Personal Data

SMC take all necessary and legally required precautions to ensure the protection of collected information from its customers, considering the scope, context, and purposes of processing, as well the risks, of variable and severity, for their personal data. In this sense, SMC applies the necessary technical and organizational measures to ensure an adequate level of security for the specific risk in question. These precautions aim to ensure the security of this information online and offline.

Whenever information relating with personal data that appears to be particularly sensitive is collected or used, the data will be encrypted using SSL protocol. Under the SSL (Security Sockets Layers) protocol, which protects the transmission of all sensitive data over the Internet, all information is treated with maximum security. Your privacy is assured and the risk of interception during communication is significantly or totally reduced.

However, it is the entire responsibility of costumers and users of SMC website to maintain the safe conditions of use, following the security practices recommended by the manufactures and/or operators, namely the installation and update of the necessary security applications, including, among others, antivirus applications.

6. Customers rights to data protection

Under the terms of the RGPD (General Data Protection Regulation), as the holder of personal data and in relation to personal data titular to processing by SMC, the costumer has the following rights, to be exercised under the terms of the RGPD and other legislation relating to personal data that is applicable:

- **Request access** to your personal information (normally called a “data titular access request”). This allow you to receive a copy of the personal information we hold about you and verify that we are processing legitimately.
- **Request correction** of personal information we hold about you. This will allow you to correct any incomplete or inaccurate information we hold about you.
- **Request deletion** of your personal information. This will allow you to have your personal information deleted or removed when there is no longer a good reason for us to continue processing it. You will also have the right to ask us to delete or remove your personal information where you have exercised your right to oppose to the processing.
- **Oppose the processing** of your personal information where we depend on a legitimate interest (or those of a third part) and there is something that makes you want to oppose to the processing for this reason.

- **Request restriction** on the processing of your personal information. This will allow you to ask us to suspend the processing of your personal information, for example, if you want us to determine its conciseness or the reason for processing it.
- **Request the transfer** of your personal information in a structured and electronic form for you or for another entity (normally known as the right to “data portability”). This will allow you to take your data from us in an electronically usable format and transfer your data for another entity in an electronically usable format.
- **Remove consent.** In limited circumstances where you may have provided your consent to collection, processing and transfer your personal information for a specific reason, you have the right to remove your consent for that specific processing at any time.

For the exercise of the referred rights, as the holder when of personal data in question, you may contact SMC through the following email: info@smc-thc.com or send a letter to SMC – Therapeutic Health Center Production LDA, Lugar do Barreiro, Rua 1 “A”, N°2 and postal code 4730-460 Vila de Prado - Braga, Portugal.

If the referred requests are manifestly unfounded or excessive, namely due to their repetitive nature, SMC may:

- Require the respective holder of personal data to pay a tax considering the administrative costs of providing the information or communication or taking the requested measures.
- Refuse to comply with the request.

When the processing is based on your consent, the costumer has the right to remove his consent at any time, without compromising the lawfulness of the processing given by SMC to his personal data based on the consent previously given. The costumer also has, at any time, the right to present a complain with a supervisory authority, whose role falls, in Portugal, to the National Data Protection Commission, headquartered at Rua de São Bento, n°148, 3°, 1200-821 Lisboa, Portugal.

7. Cookies Policy and Advertising

We use cookies to improve your performance and your experience as user in our website.

Cookies are small text files that a website, when visited, places on the user computer or mobile device, via the browser. Placing cookies will help the website to recognize your device on the next visit. We use the term cookies in this policy to refer to all files that collect information in this way. The cookies used do not collect information that can be used to identify or contact you, such as your name, email address, personal or business addresses or telephone number.

Cookies also collect generic information, namely how users arrive and use the websites or the area of the country/countries through which they access the website, etc. Cookies only retain information related with your preferences. At any time, the user can, through his browser,



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decide to be notified about the acceptance of cookies, as well as block their entry into his system.

Cookies are used to help to determine the usefulness, interest, and number of uses of the websites, allowing faster and more efficient navigation and eliminating the need to repeatedly enter the same information.

After authorizing the use of cookies, the user can always deactivate part or all our cookies. All browsers allow the user to accept, refuse or delete cookies, namely through the selecting the appropriate settings in the respective browser. You can configure cookies in the “options” or “preferences” menu of your browser.

Note, however, that by disabling cookies, you may prevent some web services from working correctly, affecting, partially or totally, the navigation on the website.

Please note that by disabling cookies, parts of our website may not work correctly. More information about cookies at: www.allaboutcookies.org .

8. Changes to the Privacy Policy

This Policy can be updated over time, so you are advised to consult this Policy whenever you provide personal data to SMC.

If you do not agree with any change made to this Policy, we ask that you do not continue to use the SMC website or send us an email expressing the same.

In case that relevant changes are made to the Terms and Conditions of use of SMC website or to this Policy, in particular changes that affect the purposes for which SMC treats the personal data of its readers, we may promote a specific communication for the disclosure of the occurrence of such changes, using, for this purpose, one or more communication channels that it has with its customers.