

# PRIVACY & COOKIES MANAGEMENT POLICY

Last update: 10.12.2019

## Personal Data Protection

It is **Finsolutia** commitment to process all personal data, in the context of its activities, and in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

For that purpose, **Finsolutia** commits to:

- Only collect data from data subject, and only those which are strictly necessary for the performance of their business activity or Human Resources Management (if data subjects are employees of **Finsolutia**);
- Whenever legally required, collect directly and previously the data subject consent, obtaining their authorization for its usage in the business environment of the company;
- Not sharing data subject information with other entities that do not have the necessary technical and organizational measures to ensure the regulation application;
- Report to the data subject, in accordance with applicable legislation, any anomalous situations that have occurred and pose significant risks to their fundamental rights and freedoms.

In addition, **Finsolutia** assures to data subjects that their data are:

- Subject to a lawful, fair and transparent processing;
- Collected for specific, explicit and legitimate purposes;
- Adequate, relevant and limited to what is required for the processing activities they are addressed;
- Preserved only for as long as necessary for the purposes for which they are processed;
- Processed in a manner that ensures their safety, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage.

Finsolutia also guarantees the following rights to data subjects:

- To obtain with ease confirmation as to whether or not personal data concerning him or her are being processed;
- Rectification or erasure of personal data or restriction of processing personal data;

- To know and be informed of the processing purposes, the period during which are processed, the of identity any recipients, the rationale of hypothetical automatic processing and, at least when profiling is performed, of its consequences;
- To receive personal data in a structured, commonly used, of automatic reading and interoperable format (capable to be read and processed by any organization), for the transmission to other data controller;
- To complain within Finsolutia of any situation considered anomalous regarding the protection of personal data or privacy;

For the data subjects exercise of rights by as well as for other issues related to personal data protection, **Finsolutia** has appointed an element of the organization to perform the duties of “Data Protection Officer” whose responsibility is to ensure that the technical and organizational measures necessary for the effective protection of personal data and the privacy of data subjects are in place and are continually improving.

It is also the Data Protection Officer responsibility to:

- Promote the integration of technical and organizational measures, in the context of data protection and privacy, into company policies, processes and procedures;
- Promote the execution of awareness-raising actions on these matters, for **Finsolutia** employees or relevant third parties;
- Oversee the handling of any anomalous situation with negative impact on the fundamental rights and freedoms of data subjects;
- Promptly promote the execution of access validation processes assigned to users of the company's information and communication systems;
- Promote regular internal or external audits to validate compliance with established data protection and privacy rules and compliance with the regulation;
- Advise on the results of PIA's or DPIA's performed by the organization;
- Be the sole contact element between the company and the Local Data Protection Authority and between **Finsolutia** and the data subject.

It is **Finsolutia** employees responsibility to comply and enforce compliance with this privacy and data protection policy as well other rules and related regulations, also in communicating any weakness or anomalous situation with impact, even if potential, on fundamental rights and freedoms of data subjects.

All employees violations of the rules set forth in this policy will be handled (if applicable) in the appropriate disciplinary and/or criminal context.

**Finsolutia** Data Protection Officer may be contacted at [DPO@finsolutia.com](mailto:DPO@finsolutia.com)

## **Cookies Policy**

This Cookie Policy is part of the Privacy Policy of the **Finsolutia** Group websites (hereafter referred to as "Websites").

Accessing and browsing websites or using their services implies the acceptance of terms and conditions contained in the Privacy Policy.

To facilitate and provide a better browsing experience through the **Finsolutia** website, we inform that it uses Cookies or other similar functionality files (hereinafter "Cookies").

In accordance with Internet communication working standards, access to websites may involve the use of cookies. **Finsolutia** is responsible for cookies and the processing of data obtained through cookies, whether own or third parties, through its websites, deciding on the purpose, content and use of the processing of collected data.

### **What is a cookie?**

Cookies are files that contain small amounts of information that are downloaded to your device when you visit a web page.

The main objective is to recognize the user whenever accessing the website, also allowing to improve the quality and offer a better use of the site, aiming to simplify the navigation.

Cookies are essential to the functioning of Internet; do not damage your equipment or device and, if enabled in your browser configuration, help identify and resolve potential errors in website operation.

### **Use of Cookies by Finsolutia**

By accessing the websites, you expressly accept the use of this type of cookies on your devices.

If you disable cookies, website navigation may not be optimized and some of the website features may not function properly.

Specifically, **Finsolutia** uses Cookies for the purposes identified below. If **Finsolutia** decides to use other Cookies for the purpose of providing more and better services, you will be properly informed.

**Cookie categories used on Finsolutia websites:**

• **Essential cookies:** These are essential because they allow you to browse our websites and allow you to access resources such as profile and customer-only areas. They do not collect information about you that may be used for marketing purposes and do not know which websites you have visited on the internet. This category of cookies cannot be disabled.

| Cookie Name                        | Source                       | Expiry  | Description and Purposes   |
|------------------------------------|------------------------------|---------|--|
| <b>Website: www.finsolutia.com</b> |                              |         |  |
| CookieConsent                      | Finsolutia.com               | 1 year  | Stores the user's cookie consent state for the current domain                                    |
| <b>Website: www.nolon.pt</b>       |                              |         |  |
| _RequestVerificationToken          | Nolon.pt                     | Session | Helps prevent Cross-Site Request Forgery (CSRF) attacks  |
| CookieConsent                      | Nolon.pt                     | 1 year  | Stores the user's cookie consent state for the current domain                                    |
| <b>Website: www.nolon.es</b>       |                              |         |  |
| _RequestVerificationToken          | Nolon.es                     | Session | Helps prevent Cross-Site Request Forgery (CSRF) attacks  |
| CookieConsent                      | Nolon.es                     | 1 year  | Stores the user's cookie consent state for the current domain                                    |
| <b>Website: www.izilend.com</b>    |                              |         |  |
| CookieConsent                      | Izilend.com                  | 1 year  | Stores the user's cookie consent state for the current domain                                    |
| <b>Website: www.fscapital.com</b>  |                              |         |  |
| ARRAffinity                        | Fscapital.azure websites.net | Session | Used to distribute traffic to the website on several servers in order to optimize response times |
| ARRAffinity                        | Fscapital.com                | Session | Used to distribute traffic to the website on several servers in order to optimize response times |
| CookieConsent                      | Fscapital.com                | 1 year  | Stores the user's cookie consent state for the current domain                                    |
| Wordfence_verifiedHuman            | Fscapital.com                | 1 day   | This cookie is used to protect the website against malware or other types of cyber attacks       |

- Analytical Cookies:** These allow us to quantify the number of users and to perform the measurement and statistical analysis of how users use our website. Website navigation is examined to improve the delivery of products and services. These data are collected and processed using their anonymization. They are mostly Third Party Cookies and are purely functional in nature, so they are not strictly necessary or essential;

| Cookie Name  | Source               | Expiry  | Description and Purposes  |
|--|----------------------|---------|---|
| <b>Website: <a href="http://www.nolon.pt">www.nolon.pt</a></b>           |                      |         |   |
| _ga  | Nolon.pt             | 2 years | Registers a unique ID that is used to generate statistical data on how the visitors use the website |
| _gat   | Nolon.pt             | 1 day   | Used by Google Analytics to throttle request rate   |
| _gid   | Nolon.pt             | 1 day   | Registers a unique ID that is used to generate statistical data on how the visitor uses the website |
| ugid   | Unsplash.com         | 1 year  | Necessary for the implementation of video-content on the website                                    |
| <b>Website: <a href="http://www.nolon.es">www.nolon.es</a></b>           |                      |         |   |
| _ga  | Nolon.es             | 2 years | Registers a unique ID that is used to generate statistical data on how the visitors use the website |
| _gat   | Nolon.es             | 1 day   | Used by Google Analytics to throttle request rate   |
| _gid   | Nolon.es             | 1 day   | Registers a unique ID that is used to generate statistical data on how the visitor uses the website |
| ugid   | Unsplash.com         | 1 year  | Necessary for the implementation of video-content on the website                                    |
| <b>Website: <a href="http://www.fscapital.com">www.fscapital.com</a></b> |                      |         |   |
| _ga  | Fscapital.com        | 2 years | Registers a unique ID that is used to generate statistical data on how the visitors use the website |
| _gat   | Fscapital.com        | 1 day   | Used by Google Analytics to throttle request rate   |
| _gid   | Fscapital.com        | 1 day   | Registers a unique ID that is used to generate statistical data on how the visitor uses the website |
| collect  | Google-analytics.com | Session | Necessary for the implementation of video-content on the website                                    |

- **Advertising Cookies:** These allow us to more efficiently manage the supply of advertising space on our website, and to analyze browsing habits and display advertising related to the user's browsing profile. They are mostly Third Party Cookies and are purely functional in nature and not strictly necessary or essential.

| Cookie Name                  | Source          | Expiry   | Description and Purposes  |
|------------------------------|-----------------|----------|---|
| <b>Website: www.nolon.pt</b> |                 |          |   |
| _fbp                         | Nolon.pt        | 3 months | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers                                     |
| fr                           | Facebook.com    | 3 months | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers                                     |
| r/collect                    | DoubleClick.net | session  | This cookie is used to send data to Google Analytics about the visitor's device and behavior. It tracks the visitor across devices and marketing channels |
| tr                           | Facebook.com    | session  | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers                                     |
| <b>Website: www.nolon.es</b> |                 |          |   |
| _fbp                         | Nolon.es        | 3 months | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers                                     |
| fr                           | Facebook.com    | 3 months | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers                                     |
| r/collect                    | DoubleClick.net | session  | This cookie is used to send data to Google Analytics about the visitor's device and behavior. It tracks the visitor across devices and marketing channels |
| tr                           | Facebook.com    | session  | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers                                     |

- **Cookies Preference:** Allow the website to remember information that changes the way the website behaves or is displayed, such as your default language or geographic region.

| Cookie Name  | Source        | Expiry | Description and Purposes   |
|--|---------------|--------|--|
| <b>Website:</b> <a href="http://www.fscapital.com">www.fscapital.com</a> |               |        |  |
| _icl_current_language  | Fscapital.com | 1 day  | Saves the user's preferred language on the website   |
| Wfvt_#   | Fscapital.com | 1 day  | Remembers the user's submitted data when a comment is submitted in a blog post. The purpose is to auto-populate form fields for subsequent comments, in order to save time for the user. |
| Wpml_referer_url   | Fscapital.com | 1 day  | Necessary for maintaining language settings across subpages on the website   |

### User setting to avoid cookies

In accordance with current legislation, information is provided on how you can configure your browser to manage and maintain your privacy and security regarding cookies, through links to the official support website of major browsers so that you can decide whether or not to accept cookies.

This allows you to block cookies through the browser configuration tools.

It should be understood that you accept the use of cookies if you continue to browse this page without first disabling it.

Cookie settings can also be changed in your browser preferences by following the directions on the following links:

#### Chrome

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>

#### Firefox

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

#### Internet Explorer

<https://support.microsoft.com/pt-pt/help/17442/windows-internet-explorer-delete-manage-cookies>

## **Safari**

<https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

## **Privacy Policy Changes**

**Finsolutia** reserves the right to make changes to this policy at any time in order to comply with market best practices, legislative or regulatory changes. Whenever this policy is changed we review the update date at the top of this document. We advise you to read this Privacy Policy periodically to know how **Finsolutia** protects your data.