



OLI – Sanitary systems

## PRIVACY POLICY

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## 1. Purpose, Scope and Users

This document is intended to provide general principles and model approach to the privacy policy of personal data in one or both of the following circumstances:

- Personal data identifying data holders residing in European Union (EU) Member States and European Economic Area (EEA) countries, regardless of where they are subject to global treatment;
- Personal data are subject to processing in the EU and / or EEA regardless of the country of residence of the data subject.

All employees, contractors or temporary staff, as well as third parties providing services to OLI are knowledgeable about this privacy policy.

## 2. Reference Documents

- EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data , and repealing Directive 95/46 / EC)
- General Privacy Policy for Personal Data
- Proposed Law No. 120 / XIII of March 26, 2018 - Applicable in Portugal

## 3. INTRODUCTION

This Privacy Policy explains what we do with your personal data.

It describes how we collect, use and treat your personal data and, in doing so, how we fulfill our legal obligations in relation to you. Your privacy is important to us and we are committed to protecting and safeguarding the rights of privacy of your data.

This Privacy Policy applies to personal data of our website Users, Clients, and potential candidates.

For the purposes of applicable data protection legislation (including but not limited to the General Data Protection Regulation [Regulation (EU) 2016/679] ("GDPR")), the company responsible for your personal data may be found here ([Link to the company that handles the data](#)).

It should be noted that occasionally we may change this Privacy Policy. If you want to keep up to date, please visit this page ([page of the website privacy policy](#)), as all changes will be posted here.

If you are not satisfied with any aspect of our privacy policy, you may benefit from legal rights and, where relevant, they were also described.

This Privacy Policy applies in the relevant countries of our international network. Different countries may approach data privacy in slightly different ways. This enables us to ensure that we comply with all applicable data protection protections regardless of where you are.

## 4. OVERVIEW

### 4.1. What kind of personal data we collect?

- **CANDIDATE DATA:** In order to provide you with the best job opportunities we need to process certain information of your own. This information is collected in order to assess your application, hence it is necessary for us to necessarily get your name, age, contact details, nationality, address, postal code and location, information on educational and information technology domain. If you so choose, you may optionally provide us with other information relevant to your application.

Where appropriate and in accordance with local laws and requirements, we may also ask you for information relating to your health, information or other information about any criminal convictions.

- **CONTACT DETAILS:** If you wish to contact us for any other reason (eg for clarification, information, etc.), we need to collect and use information about you such as: Name, Address, Telephone and Email Contact.

- When you access our website, automatically proceed to the collection of certain your data. If you would like more information about this collection, you can consult the cookie policy used and described below.

- **SITE USERS:** We collect a limited amount of data, which we use to help us improve your experience when you use our website and to help us manage the services we provide. This includes information about how you use our site, how often you access the same and times that our site is more popular.

- **NEWSLETTER SUBSCRIPTION:** We collect from you only your email which will be available in our database to send the same.

## 5. OUR LEGAL BASES FOR THE TREATMENT OF YOUR DATA

### 5.1. How we collect your personal data

- **CANDIDATE DATA:** There are two ways in which we collect your personal data:

1. Directly by filling out the form on the website;
2. From your CV.

When you access our website or read or click on an email from us, we may also automatically collect certain data.

- **CONTACT DETAILS:** We collect your personal data:

1. Directly by completing the form on the website;

When you access our website or read or click on an email from us, we may also automatically collect certain data.

- **SITE USERS:** We collect your data automatically through cookies when you visit our website, in line with your browser's cookie settings. If you want to find out more about cookies, including how we use and what options are at your disposal, see the description below. We will also collect data about you when you contact us through the site, for example using e-mail functionality.

- **NEWSLETTER SUBSCRIPTION:** We collect your data:

Directly through the subscription completing the form on the site Newsletter.

### 5.2. How we use your personal data

- **CANDIDATE DATA:** The use of information on the candidates is intended to ascertain whether the respective qualifications are likely to come to yield one or more contacts and, in a second stage, they may be used for the purposes of an employment relationship.

- **CONTACT DETAILS:** These contact details will be used only to answer all the questions posed by any user of the site after being eliminated.

- **SITE USERS:** We use your data to help us improve the use of our website, for example by analyzing the criteria of its recent research, which will allow us to introduce you to the solution that we believe may be of interest.

We call the attention to the fact that communications to and from OLI, including emails, may be used as part of internal or external consultation or in case of dispute.

- **NEWSLETTER SUBSCRIPTION:** We will use your data to send you our newsletter on a regular basis and, where appropriate and in compliance with local laws and requirements, we may also use your personal data for purposes such as marketing and / or diversity monitoring. In these cases we take care of getting your consent to accomplish these initiatives.

### 5.3. With whom we share your personal data

- **CANDIDATE DATA:** Unless otherwise indicated, we may share your information with any of the companies in our group and associated third parties, such as our service providers, in order to provide you with the best possible solution for your case.
- **SITE USERS:** Unless otherwise from you, we may share your information with the network analysis service providers, marketing automation platforms and social networking services to ensure that the ads they receive are directed to you.

### 5.4. How we safeguard your personal data

The protection of your information is important to us, which is why we apply appropriate measures designed to prevent unauthorized access and improper use of your personal data.

### 5.5. How long do we keep your personal data

If, within a period of 5 years, we have not had any relevant contact with you (or, where appropriate for OLI), we will delete your personal data from our systems, unless there is legislation or other regulations requiring its retention (eg with the tax authorities or arising out of a dispute).

### 5.6. How you can access, change or remove the personal data you provided us (Art 15<sup>o</sup> and Art 16<sup>o</sup> GDPR)

Even if you are in the power of your personal data, you still have several rights in relation to them. These rights are described in more detail in chapter III (rights of the data subject) of the GDPR-[https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights\\_pt](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights_pt). To stay Know them, contact us. We will seek to address your request without undue delay and, in all cases, in accordance with the requirements of any applicable law. Please note that we may keep a record of your communications to help us resolve any issues raised by you.

- **Right to oppose (Art 21<sup>o</sup> GDPR):** If we are to use their data because we believe that this is necessary for our legitimate interests, and not agree, you have the right to object. We will respond to your request within 30 days (although in certain cases we may be allowed to extend this deadline). As a general rule, we will only disagree with you if certain limiting conditions apply (such as arising from legal obligations).
- **Right to withdraw consent (Art 17<sup>o</sup> GDPR):** You may at any time withdraw your consent to the processing of your personal data collected for purposes such as: newsletter submission or direct marketing actions.
- **Access Requests from the Data Owner (ARDO) (Art 15<sup>o</sup> GDPR):** You have the right to request us, at any time, to confirm the information we have about you and may require us to change, update or delete this information.

In this circumstance we can:

- Ask you to confirm your identity or ask for more information about your request;
- Refuse your request, justifying its reason.

• **Right to erasure (Art 17º GDPR):** In certain situations (for example, if we have acted illegally to the processing of data), you have the right to ask us that we eliminate your personal data. We will respond to your request within 30 days (although in certain cases we may be allowed to extend this deadline). However, in the cases provided by law, such right may not be exercised (for example, the exercise of a right in legal proceedings). If there is no legal impediment, we will erase your data, but we will assume that you will prefer us to keep a note of your name in our register for people who prefer not to be contacted. In this way, we will reduce the chances of being contacted in the future when your data is collected in unrelated circumstances. If you prefer us not to do, you can instruct us accordingly.

• **Right to data portability (Art 20º GDPR):** If you so wish, you have the right to transfer your data to another controller. We will collaborate on this transfer - directly transferring your data to you or providing you with a copy in an automatic read-only format in current use.

• **Right to complain to a supervisory authority:** You also have the right to submit a complaint to your local control authority, whose data can be consulted here.

([https://www.cnpd.pt/bin/Duvidas/Queixas\\_frm.aspx](https://www.cnpd.pt/bin/Duvidas/Queixas_frm.aspx)).



## 6. Who is responsible for the processing of your personal data on the OLI website?

- OLI controls the processing of your personal data on your site.

### 6.1. What are cookies and how we use it

A "cookie" is a small data file that is stored on the hard drive of your computer. They are used by almost all websites and will not damage your system. We use them to track your activity in order to help us ensure that you get an experience with the fewest possible problems when you visit our site. We may use your cookie information to ensure that we provide you with solutions tailored to your preferences on your next visit. We may also use cookies to analyze the traffic and advertising purposes.

If you want to check or change the type of cookies you accept, you can usually do so in your browser settings.

### 6.2. Rejecting cookies

If you do not wish to receive cookies that are not strictly necessary to perform basic functionality of our site, you may choose to opt out by changing your browser settings.

Most browsers will accept cookies, but if you do not want us to collect data in this way you can choose to accept all or some cookies or refuse cookies in your browser's privacy settings. However, refuse all cookies means that you may not be able to fully use all the features of our site. Each browser is different and therefore you should check the "Help" menu of your browser to find out how to change your cookie preferences.

For more general information about cookies, including how to disable cookies, see [aboutcookies.org](http://aboutcookies.org). You'll also find information on how to delete cookies from your computer.

To disable Google Analytics, use this link: <https://tools.google.com/dlpage/gaoptout>

To disable Yandex.Metrica, use this link: <https://yandex.com/support/metrica/general/opt-out.xml>

If you disable or delete these cookies, you may have to leave the page where you are, log in again, or if you have a new device or if you delete the cookie file from your browser.

### 6.3. Marketing Activities

From time to time, we may send you information that we consider to be of interest to you, if it has been demonstrated through any request for information through the form on our website. In particular, we may need to use your data for the purposes exemplified below (always in accordance with local laws and requirements), otherwise they will not be sent.

- Development and commercialization of other products and services;
- Sending data about promotions, offers, or event information that we think may be of interest to you;

- Presentation of promotional excerpts on the OLI website as a success story (only when we have obtained your express consent to do so);

We need your consent for some aspects of these activities that are not covered by our legitimate interests (in particular, the collection of data through cookies and the provision of direct marketing to you through digital channels) and, depending on the situation, you can do so through an opt-in or soft-opt-in option.

Soft-opt-in consent is a specific type of consent that applies when you have previously been involved with us. Under the soft opt-in consent, we will consider that your consent was given unless or until you self-exclude. For most people, it is beneficial because it allows us to suggest other products along with the one you are looking for, greatly increasing the likelihood that we will find what you are really looking for. For other types of marketing by electronic means, we are required to obtain your specific consent.

If you disagree with our marketing approach, you have the right to withdraw your consent at any time. We want to let you know that even if you have been excluded from our marketing communications through our preference center, your data may be retrievable through public sources in a non-marketing campaign. We will try to make sure this does not happen, but if it does, we cannot help it. We will only do so in the circumstances in which self-exclusion.

## 7. HOW CAN ACCESS, CHANGE OR REMOVE THE PERSONAL INFORMATION PROVIDED TO US?

One of the main objectives of the GDPR is to protect and clarify the rights of EU citizens and people in the EU regarding data privacy. This means that you have several rights with respect to your data, even when you have provided us with such data. These rights are described in more detail in chapter III (rights of the data subject) of the GDPR - [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights\\_pt](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights_pt).

To know these rights, contact us. We will try to process your request without undue delay and in any case within one month (subject to any extensions permitted by law). Please note that we may keep a record of your communications to help us resolve any issues you may have.

• **Right to oppose:** this right allows you to oppose our personal data when we do so for one of the following reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) scientific, historical, research or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the most likely to apply to our Site Users. If your objection concerns the processing of our part of your personal data as we consider it necessary for our legitimate interests, we must act according to your objection by terminating the activity in question, unless:

- We can demonstrate that we have legitimate compelling reasons for treatment that overlap with your interests;

Or

- We are processing your data for the requested purpose, the exercise or the defense of a right.

If your objection is related to direct marketing, we must act according to your objection by ending this activity.

• **Right to withdraw consent:** If we have obtained your consent to process your personal data for certain activities (for example, for our marketing agreements or automatic profiling), you may withdraw this consent at any time and we will no longer perform the specific activity you previously unless we consider that there is an alternative reason to justify the continued treatment of our part of your data for this purpose. In this case in which we will inform you about this condition.

• **Access Requests from the Data Owner (ARDO):** You may ask us at any time to confirm the information we have about you and you may ask us to change, update or delete this information. We may ask you to verify your identity and more information about your request. If we grant you access to your information, we will not charge you for access unless your request is "manifestly unfounded or excessive." If we ask for additional copies of this information, we may charge you a reasonable administrative cost, where this is legally permissible. In cases where we are legally permitted, we may deny your request. If we deny your request, you will always be informed of the reasons for doing so.

Please note that in certain jurisdictions in which we operate, we comply with additional local law requirements for data subject access requests, and we may deny your request in accordance with that law.

• **Right to delete:** In certain circumstances, you have the right to ask us to delete your personal data. Normally, the information must meet one of the following criteria:

- Data is no longer required for the purpose for which we originally collected and / or treated;
- When given previously, you have withdrawn your consent to process your data, and there is no other valid reason why we should continue to treat them;
- The data have been unlawfully processed (ie in a way that does not comply with the GDPR);
- It is necessary that the data be erased in order to fulfill our legal obligations as the controller; or

We will only refuse to honor your request for one of the following reasons:

- To exercise the right to freedom of expression and information;
- To fulfill legal obligations or to perform a task of public interest or the exercise of an official authority;
- For archival, research or statistical purposes;

Or

- For the exercise or defense of a right.

By complying with a valid data erasure request, we will take all reasonable practical steps to erase the relevant data.

• **Right to restrict treatment:** In certain circumstances, you have the right to restrict the processing of your personal data. This means that we can only continue to store your data and we will not be able to carry out further treatment activities until: (i) one of the circumstances listed below is resolved; (ii) their consent is obtained; or (iii) that additional treatment is required for the declaration, exercise or defense of a right, the protection of the rights of another person or motives of important public interest of the EU or of a Member State.

The circumstances in which you are entitled to request that the restriction of the processing of your personal data is:

- In the event you dispute the accuracy of your personal data that we treat. In this case, the processing of our part of your personal data will be restricted for the period during which the accuracy of the data is verified;
- In case you object to the processing of your personal data against our legitimate interests. In this situation, you can request that the data be restricted while we verify our grounds for the processing of your personal data;
- If the treatment that we make of your data is illegal, but we prefer to restrict the treatment that we make of them instead of the respective erasure;
- If we no longer need to process your personal data but need the data for the declaration, exercise or defense of a right.

If we have shared your personal data with third parties, they will be notified of the restricted treatment, unless this is impossible or involves a disproportionate effort. We will, of course, notify you before lifting any restriction on the processing of your personal data.

• **Right of rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data we have about you. If we have shared such personal data with third parties, they will be notified of the rectification, unless this is impossible or involves a disproportionate effort. Where appropriate, we will also tell you to which third parties we have disclosed inaccurate or incomplete personal data. In cases where we consider that it is reasonable not to comply with your request, we will explain the reasons for the decision.

• **Right to data portability:** If you so wish, you have the right to transfer your personal data to controllers. In effect, this means that you can transfer the data from your OLI account to another online platform. To enable you to do so, we will provide you with your data in a password-protected, current-use, read-only format so you can transfer the data to another online platform. Alternatively, we can directly transfer the data for you. This right to data portability applies to: (i) personal data that we treat automatically (ie without any human intervention); (ii) personal data provided by you; and (iii) personal data that we treat based on your consent or to fulfill a contract.

• **Right to complain to a supervisory authority:** You also have the right to complain to your local supervisory authority. You can see details of the contact of the same in Point 12 below.

If you wish to exercise any of these rights or withdraw your consent for the processing of your personal data (if consent is our legal basis for processing your personal data), you can always contact us. Please note that we may keep a record of your communications to help us resolve any issues you may have.

**Note:**

Regarding the rights described above, and in order that we may at any time give you the right treatment at the time of your request, it is important that the personal information we have about you is accurate and current. Please let us know if there are changes to your personal information during the period in which we keep your data.

## 8. COOKIES POLICY

### 8.1. What is a cookie?

A cookie is an information file that is stored on your computer's hard drive and records you're browsing on a website so that when you revisit that site you can present custom options based on the information stored on your last visit. We may also use cookies to analyze traffic and for advertising and marketing purposes.

OLI uses cookies in the same way as many online websites. Cookies are text windows that websites transfer to devices that users are accessing - computer, tablet, or smartphone. Cookies pass through the browser allowing the website to recognize which browser is used and to collect certain types of information. "Cookies" help to know the preferences of users based on previous activities that occurred in a given website, given the opportunity to provide more appropriate services. Cookies are also used to aggregate information about the flow and interactions of websites in order to provide better experiences and tools in the future.

Cookies cannot be used to run programs or install viruses on users' devices. With the information contained in the cookies, OLI can simplify the navigation and correct exposure of the website.

They are used by almost all sites and do not harm your system. If you want to check or change the type of cookies you accept, you can usually do so in your browser settings.

### 8.2. How we use cookies?

**We use cookies to:**

- To track your use of our website. This allows us to understand how you use the site and track any patterns that may arise individually or from larger groups, which will help us to develop and improve our site and services in response to what our visitors want and need;

Cookies are:

- **Session cookies:** These are only stored on your computer during your web session and are automatically deleted when you close the browser - they usually store an anonymous session ID allowing you to navigate a site without having to log in to each page, but not collect any information from your computer;

- **Persistent Cookies:** A persistent cookie is stored as a file on your computer and is maintained when you close your Web browser. The cookie can be read by the site that created it when you return to that site. We use persistent Google Analytics and other cookies (see Cookies List below).

**Cookies can be categorized as follows:**

- **Strictly needed cookies:** These cookies are essential to enable you to use the site effectively, such as when you apply for an opportunity and therefore cannot be disabled. Without these cookies, the services that are available to you on the site cannot be provided. These cookies do not collect information about you that can be used for marketing.

- **Performance cookies:** These cookies allow us to monitor and improve the performance of our site. For example, they allow us to count visits, identify traffic sources, and see which parts of the site are most popular.

- **Feature Cookies:** These cookies allow our site to remember the choices it makes and provide enhanced functionality. For example, we may provide you with news or updates relevant to the services you use. They can also be used to provide services you have requested, such as viewing a video. The information that these cookies collect is usually anonymized.

The cookies list below and represents the ones we use within the jurisdiction, the reason we use them and what kind of cookies are.

### 8.3. COOKIES LIST

PHPSESSID

Cookie

#### Google Analytics

Cookies from a third-party company to Oli who is not the manager of the Oli-sanitary Systems page, with the privacy policy of Google INC. Available at <https://policies.google.com/privacy?hl=pt>.

These cookies help us improve the performance of our website and all the information collected by its use on our page will be transferred and stored on Google's servers in Europe and/or us in order to allow them to take Indicators for using our page as well as compiling reports of the operability of our page.

OLI has activated the anonymization of IP addresses in Google Analytics, this feature makes IP addresses of anonymous users, as soon as this is technically possible in the earliest possible phase of the network, you can get more technical information at: <https://support.google.com/analytics/answer/2763052?hl=pt>.

You can check the list of cookies created by Google Analytics at the following address, <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage?hl=pt-PT>

## Yandex Metrika

Cookies from a third company to Oli that is not the manager of the page of Oli – sanitary systems, with the terms of the processing of information as specified by Yandex Oy Limited Company: [https://yandex.com/legal/metrika\\_eea\\_termsfuse/](https://yandex.com/legal/metrika_eea_termsfuse/)

These cookies help us improve the performance of our website and all the information collected by its use on our website will be transferred and stored on the Yandex servers in Europe and/or Russia in order to allow them to take Indicators for using our page as well as compiling reports of the operability of our page.

OLI has activated the anonymization of IP addresses in Yandex. Metrika, this feature makes the IP addresses of anonymous users, as soon as this is technically possible in the earliest possible phase of the network, you can get more technical information (in English): <https://yandex.com/support/metrika/general/ip-masking.html>

You can check the list of cookies created by the Yandex metric at the following address, <https://yandex.com/support/metrika/general/cookie-usage.html>.

To know the legal and interpretative framework established by the European Union on "cookies" and its use, you can see: [http://ec.europa.eu/ipg/basics/legal/cookies/index\\_en.htm](http://ec.europa.eu/ipg/basics/legal/cookies/index_en.htm).

We set out in point 6.2 how to decline "cookies" if that is your will.

## 9. OUR LEGAL BASES FOR THE TREATMENT OF YOUR DATA

### 9.1. LEGITIMATE INTERESTS

- Article 6 (1) (f) of the GDPR is that which governs legitimate interests - states that we may process your data if it is "necessary for the legitimate interests pursued [by us] or by third parties, unless the interests or fundamental rights and freedoms of the holder [you] that require the protection of personal data prevail. "

- We do not consider any of our activities to be detrimental, in any way, to the people, rather they help us to offer them a more adequate and efficient service. However, you always have the right to object to our handling of your personal data on this basis.

Please note that in certain jurisdictions where we operate, a different legal basis may apply to the processing of data.

### 9.2. CONSENT

In certain circumstances, we are required to obtain your consent for the processing of your personal data in relation to certain activities. Depending on what we do with your information, this consent will be for inclusion or consent of soft opt-in.

- Article 4 (11) of the GDPR indicates that consent is "a free, specific, informed and explicit manifestation of the willingness of the data subject to accept, through a statement or an unequivocal positive act, that the data personal data concerning him or her are treated. "

In simplified language, this means that:

- You must give us your consent freely, without any kind of pressure from us;

- You have to know what you are consenting to - we will therefore make sure that we provide you with sufficient information;

- Must have control over which treatment activities gives consent or not. We've made these more specific checks in our Privacy Preferences Center;

- You must have an unambiguous positive act in transmitting your consent - it is likely that we will provide a box to tick so that this requirement is met in a clear and unambiguous manner.

Thus, we will keep records of the consents given by you in this way.



## 10. Intellectual Property Rights

© Copyright OLI. All rights reserved. The texts, images, graphics, sounds, animations and videos as well as their arrangement on the website are the exclusive property of OLI and are protected by the applicable laws regarding copyright and industrial property rights. The content of this website may not be copied, reproduced or altered for commercial or other purposes or made available to third parties.

Any use, in any way or form, of the contents of the website, or any intellectual property rights of OLI or any company of the group, in whole or in part, requires prior written authorization from OLI. The user undertakes not to perform any act that is likely to violate the intellectual property rights of OLI or third parties, namely, the creators of the website and / or its licensees.

## 11. ANNEX 1 - HOW TO CONTACT US

If there are any issues related to the Privacy Policy, users should contact OLI using the information below:

[www.oli-world.com](http://www.oli-world.com)

OLI – Sistemas Sanitários, S.A.

Travessa de Milão

Esgueira, Aveiro 3800-314

Portugal

[privacy@oli-world.com](mailto:privacy@oli-world.com)

+351 234 300 200

## 12. ANNEX 2 - HOW TO CONTACT YOUR CONTROL AUTHORITY

### Data from your supervisory authority:

The National Commission of Data Protection. You can contact him in the following ways:

- Phone (+351) 213928400 / Privacy Line: +351 21 393 00 39
- Email: [geral@cnpd.pt](mailto:geral@cnpd.pt)
- Requests for information online: [https://www.cnpd.pt/bin/Duvidas/Duvidas\\_frm.aspx](https://www.cnpd.pt/bin/Duvidas/Duvidas_frm.aspx)
- Complaints online submissions: [https://www.cnpd.pt/bin/Duvidas/Queixas\\_frm.aspx](https://www.cnpd.pt/bin/Duvidas/Queixas_frm.aspx)
- Address: Rua de São Bento, nº 148-3º, 1200-821 Lisboa, Portugal
- Fax: +351 21 397 68 32

## 13. GLOSSARY

- **Clients / Candidates** - although the designation is sufficiently enlightening, this category includes customers and others to whom OLI provides services in the course of its activity.
- **Delete** - although we will make every effort to permanently erase your personal data as soon as the storage period has expired or when we receive a valid request from you to do so, some of your data may continue to exist on our systems, such as if you are waiting replaced. In our case, these data have been placed out of use, which means that although they still exist in our file system, they can not be immediately accessed by our operating systems, processes or personnel.
- **General Regulation on Data Protection (GDPR)** – a legal instrument of the European Union aimed at harmonizing European data protection laws. It has an effective application date of May 25, 2018, and any references thereto must be construed accordingly to include any legislation implementing it.
- **Personal** - includes employees and trainees directly involved in OLI's activity (or who has accepted an offer to get involved), as well as certain employees involved in the service activity to OLI (although they are not considered collaborators). For these purposes, we also include OLI employees involved in working on Client's premises, these individuals are treated in the same way, and are covered by this Privacy Policy. Likewise, independent contractors and consultants performing services for OLI are covered by the definition of a "Vendor" for the purposes of this Privacy Policy.
- **Providers** - refers to partnerships and companies (including sole traders) and atypical workers as independent contractors and self-employed, who provide services to OLI. In this context, suppliers who are individual contractors, self-employed or suppliers' employees will be treated for data protection purposes. Please note that, in this context, OLI requires Suppliers to communicate the relevant parts of this Privacy Policy in particular to its employees.
- **Site Users** - anyone accessing OLI's website.

## 14. VALIDITY AND MANAGEMENT OF DOCUMENTS

The document is valid as of May 25, 2018.

The owner of this document is the Department of Information Systems, which needs to verify and if necessary update the document annually.

To evaluate the effectiveness and adequacy of this document, the following criteria should be considered:

- Policy Development
- Preparation of process documentation
- Preparation of documentation of procedures
- Review of documentation periodically

[job title]

[name]

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[signature]