

PRIVACY AND PERSONAL DATA PROTECTION POLICY

(English Version for Information Purposes)

Reflecting its vision and aligned with its objective to act responsibly within the community it operates in and in its relationships with clients, the protection of privacy and personal data and their transparent and ethical processing are core values for the entire Steconfer Group.

For this reason, all companies within the Steconfer Group process personal data based on the following principles:

- Personal data is processed lawfully, fairly, and transparently;
- Data is collected only for specific, explicit, and legitimate purposes, in accordance with applicable law;
- Collected data is limited to what is strictly necessary and retained only for the duration required to fulfill the purposes for which it was collected;
- Access to personal data is limited to employees, collaborators, and partners of the Group whose roles require such access;
- Personal data is processed confidentially.

Personal Data

According to data protection legislation, personal data is any information relating to an identified or identifiable natural person (the data subject). An identifiable natural person is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, an identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

Data Controller

The data controller is the Steconfer Group company with which the data subject has a relationship.

Lawful Basis for Processing

The companies within the Steconfer Group will only process personal data if one of the conditions set forth in data protection legislation is met, namely:

- The data subject has given consent to the processing of their personal data;
- The processing is necessary for the performance of a contract to which the data subject is a party or for pre-contractual steps at the request of the data subject;
- The processing is necessary for compliance with a legal obligation to which the Steconfer Group is subject;
- The processing is necessary for the purposes of the legitimate interests pursued by the Steconfer Group.

In compliance with Article 30 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation – GDPR), Steconfer maintains an up-to-date record of all personal data processing activities under its responsibility. This record includes, in a structured manner, all legally required elements, namely the purposes of processing, the categories of data subjects and personal data, recipients, international transfers, retention periods, and the technical and organizational measures implemented. This record constitutes a central tool for monitoring and accountability, enabling Steconfer to ensure and demonstrate compliance with the applicable regulatory framework and respond quickly and effectively to any requests from supervisory authorities.

Retention Period of Personal Data

In line with the above principles, personal data processed by Steconfer is retained for the period strictly necessary to achieve the purposes for which it was collected. The determination of these periods is based on clearly defined and appropriate information retention criteria, complying with legal and regulatory obligations applicable to the Group.

Data Subject Rights

The Steconfer Group ensures that data subjects can exercise the rights granted to them under data protection legislation, including:

- **Right of access** (data subjects can obtain confirmation of whether their personal data is being processed and access such data);
- **Right to rectification** (data subjects can request the rectification or completion of their personal data);
- **Right to erasure** (data subjects may request the deletion of their personal data in certain circumstances: (i) if the data is no longer necessary for the purposes for which it was collected or processed; (ii) if consent is withdrawn and there is no other legal basis for processing; (iii) if the data subject objects to the processing and there are no overriding legitimate interests; (iv) if the data has been unlawfully processed; (v) if the

data must be erased to comply with a legal obligation; or (vi) if the data was collected in connection with the offer of information society services);

- **Right to restriction of processing** (data subjects may request the restriction of processing when (i) the accuracy of the data is contested for a period enabling verification; (ii) the processing is unlawful; (iii) the data is no longer needed for processing purposes but is required for the establishment, exercise, or defense of legal claims; or (iv) the data subject has objected to the processing and there are no overriding legitimate interests);
- **Right to data portability** (where processing is based on consent or a contract and carried out by automated means, the data subject may request the personal data provided to be delivered in a structured, commonly used, and machine-readable format, or transmitted to another controller, where technically feasible);
- **Right to object** (data subjects may object to the processing at any time when (i) processing is based on the legitimate interest of the controller, or (ii) processing is conducted for purposes other than those for which the data was originally collected);
- **Right not to be subject to automated individual decision-making** (in certain cases, data subjects have the right to request human intervention when decisions are made solely based on automated processing);
- **Right to withdraw consent** (data subjects have the right to withdraw their consent to the processing of their personal data at any time);
- **Right to lodge a complaint with the supervisory authority** (regarding any matters related to the processing of their personal data).

To exercise any of the above rights or for any questions related to privacy and personal data protection by the Steconfer Group, you may contact us via post or email using the contact details provided in the “Contacts” section of this website.

Security Measures

The companies within the Steconfer Group have in place technical and organizational security measures that ensure the protection of personal data against personal data breaches (“personal data breach”: a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed) and any other form of unlawful processing.

The commitment to personal data protection also entails that whenever personal data is transmitted to other entities, such entities are contractually bound to adopt technical and organizational measures ensuring the same level of protection.

Communication of Personal Data to Other Entities

In the course of their activities, the companies within the Steconfer Group may need to communicate or provide access to personal data to other entities, always ensuring that such entities implement adequate technical and organizational measures to protect the data.

Personal data will only be accessed or shared with the following entities:

- Companies belonging to the Steconfer Group;
- Entities providing services to the Group, such as IT support, document management, legal support, human resources;
- Clients of the Steconfer Group companies;
- Public authorities (e.g., Tax and Customs Authority).

Additional Information

If you wish, you may request more detailed information regarding privacy and personal data processing by writing to: legal@steconfer.com

The privacy policy of the Steconfer Group may be subject to change at any time. In such cases, changes will be duly announced and published on the website.

QUADRO DE REGISTO DAS ATIVIDADES DE TRATAMENTO DE DADOS

Este documento foi criado para garantir o cumprimento do Artigo 30.º do Regulamento Geral sobre a Proteção de Dados (RGPD), que exige que todas as empresas com mais de 250 trabalhadores conservem um registo das atividades sob a sua responsabilidade que inclua, designadamente a seguinte informação: tipo de dados tratados, finalidades, descrição das categorias de titulares de dados e destinatários dos mesmos, medidas de segurança e prazo de conservação mantenham um registo atualizado das atividades de tratamento de dados pessoais

Os responsáveis pelo tratamento de dados devem preencher cada campo com a máxima precisão, garantindo que:

- Todas as finalidades de tratamento sejam claramente descritas;
- As categorias de dados pessoais e de titulares sejam corretamente identificadas;
- Os destinatários (incluindo transferências internacionais) sejam especificados;
- Os prazos de conservação estejam alinhados com a política interna de retenção de dados;
- As medidas de segurança adotadas sejam descritas de forma clara.

Este registo é um instrumento essencial para demonstrar a conformidade com o RGPD e estará disponível para inspeção pela Comissão Nacional de Proteção de Dados, mediante solicitação.

O que se entende por dados pessoais?


Dados pessoais são quaisquer informações sobre uma determinada pessoa, identificada ou identificável, denominada titular dos dados. Exemplos de dados pessoais:

- nome
- morada
- número do documento de identificação/passaporte
- rendimento
- perfil cultural
- endereço IP (protocolo internet)
- dados na posse de um hospital ou médico (que identifiquem de forma inequívoca uma pessoa para fins relacionados com a saúde)

É proibida a recolha e tratamento de dados pessoais da seguinte natureza:

- origem racial ou étnica
- orientação sexual
- opiniões políticas
- convicções religiosas ou filosóficas
- filiação sindical
- dados genéticos, biométricos e relativos à saúde, exceto em casos específicos (por exemplo, se tiver recebido consentimento explícito ou o tratamento for necessário por motivos de interesse público importante, com base no direito europeu ou nacional)
- dados pessoais relacionados com condenações penais e infracções, salvo se tal for autorizado pelo direito europeu ou nacional

Póvoa de Santarém, 28 de março de 2025



O Conselho de Administração
Steconfer, S.A.

Anexo: minuta de ficha de tratamento de dados, a anexar ao presente quadro de registo.