

Policy: Privacy

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Department : Q&CI

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PRIVACY POLICY

Unipartner IT Services, S.A. (hereafter referred to as Unipartner) is committed to protecting the privacy of all individuals who provide their personal data to the company. Unipartner has developed this Privacy Policy (hereinafter referred to as the policy) to demonstrate its commitment and transparency regarding privacy rules and personal data protection.

1. Responsible for Treatment

Unipartner, a legal entity with registration number 513662332, headquartered at Av. Barbosa du Bocage, no. 113-1º, 1050-031 Lisbon, is, according to the definition in the *General Data Protection Regulation* (GDPR), the controller of personal data processing, with the obligation to:

- determine which personal data is collected and the respective means of processing;
- ensure that the processing of personal data is carried out within the scope of determined, explicit, and legitimate purposes for which it was collected;
- collect, use, and retain only the personal data that is strictly necessary for the purpose in question;
- process personal data only for legally prescribed purposes or for the continuation of services at your request;
- adopt and implement technical and organizational measures appropriate to the risk, and be able to demonstrate that the collection and processing of personal data are carried out in compliance with the rules resulting from the GDPR and the Enforcement Law.

Unipartner, as the controller of personal data processing, is committed to:

- process your data legitimately, fairly and transparently, guaranteeing the confidentiality and security of the information requested;
- ensure that personal data is processed only for the purposes for which it was expressly indicated, collected and authorized;
- collect, use and store only the minimum personal data necessary and sufficient for the purpose in question;
- process personal data for legally prescribed purposes or for the pursuit of services requested by the citizen;
- not to transmit personal data for commercial or advertising purposes that have not been duly consented to by the data subject.

2. Aim of the Privacy Policy

This Privacy Policy (hereinafter "Policy") establishes the general way in which Unipartner, in its role as data controller, respects the principles applicable to the privacy and protection of your data, and ensures strict compliance with the provisions of Article 35 of the Portuguese Constitution, Regulation (EU) 2016/679, of the European Parliament and the Council, of 27 April 2016 (General Data Protection Regulation) and Law 58/2019, of 27 April 2016 (General Data Protection Regulation). It also ensures strict compliance with the provisions of Article 35 of the Constitution of the Portuguese Republic, Regulation (EU) 2016/679 of the European Parliament and the Council of April 27, 2016 (General Data Protection Regulation) and Law No. 58/2019 of August 8, which ensures the implementation in the national legal order of the GDPR on the protection of natural persons with regard to the collection and processing of personal data and the free movement of such data.

The purpose of this Policy is to inform the data subject of Unipartner's processing of their personal data:

- What and how the data subject's personal data is collected and processed;
- To whom personal data may be communicated and shared;
- How personal data is protected and the security of its processing guaranteed;
- What rights the data subject has and how to exercise them.

For the purposes of this Policy, the concept of "personal data," as well as any terminology, expressions, and concepts related to data protection, are those defined in the GDPR and in the national or European legislation in force at any given time.

Please note that the Cookies Policy is regulated in a separate document.

3. Collection and processing of personal data

Unipartner collects data on different categories of data subjects, such as, among others:

- Applicants for internships and jobs
- Employees and former employees: trainees, employees, contractors
- Customers
- Partner representatives
- Supplier representatives
- Citizens and subscribers (for event registration and direct marketing)

Unipartner may collect personal data directly from data subjects, collected by telephone, in writing or via e-mail addressed to it or by registering on the portals managed by the organization. When authorized to do so, Unipartner may also process data collected and made available by third parties, such as customers and suppliers, in relation to information about their employees and customers.

Of the different categories of data subjects, Unipartner may process various categories of personal data, such as:

- **Generic identification data and other related data**, such as full name, nationality, gender/sex, numerical identifier (ID card/BI number, NISS, TIN, driving license and its expiration date), age, date and place of birth,
- **Academic and professional identification data**, namely: academic qualifications and/or level of education; curriculum vitae, category and type of contractual relationship; position, job description; basic salary and respective position and salary level;
- **Family identification data**, including marital status, cohabitants, ascendants and descendants (or dependents), number of income earners, family structure or degree of parenthood;
- **Communication data**, such as telephone contact, email address (personal and/or work); address, and zip code;
- **Natural data**, such as place of birth, date of birth, age or age groups, image and/or voice;
- **Bank identification data**, including IBAN, bank account number, bank card validity;
- **Tracking data**, for example, device identifiers (e.g. terminal identifiers, IP address and MAC address), cookies, location data (travel, GPS, and GSM data);
- **Data of a highly personal nature** (socioeconomic background and private life).

Unipartner may also process data for the purposes associated with the processing, in particular where the processing is necessary for employment law, social security purposes; for reasons relating to the exercise or defense of legal claims; for occupational health purposes or for statistical purposes:

- **special categories of personal data**, designated as “sensitive”, relating to health, biometric data and trade union membership; or
- **personal criminal data**, and related criminal convictions, offenses or security measures).

In compliance with the principles of data minimization, legitimacy, and determination of the purposes of collection and processing, as well as storage and conservation for the period strictly necessary, Unipartner guarantees the adoption and implementation of technical and organizational, physical, and logical measures, appropriate to the risks to the freedoms of natural persons.

4. Purposes of processing personal data

As part of its mission, Unipartner processes personal data for the following purposes, among others:

Treatment	Overall purpose	Specific goals
Human Resources Management	Supporting Unipartner's growth by recruiting the best talent, managing the employee lifecycle, involving and empowering People	<ul style="list-style-type: none"> ▪ Attraction, selection and recruitment ▪ Integration and instruction of new employees / trainees on the culture, routine and dynamics of Unipartner ▪ Management and control of attendance, vacations, absences and leaves ▪ Management of Unipartner's participation in IEFPP employment support measures ▪ Career management ▪ Training planning and management

Treatment	Overall purpose	Specific goals
		<ul style="list-style-type: none"> ■ Performance management and evaluation ■ Promotion, management and control of benefits and other bonuses for employees (e.g. benefits, health & well-being) ■ Management of organizational change
Administrative management	Ensuring the end-to-end operation and infrastructure of the business for all those who benefit directly or indirectly from Unipartner's facilities	<ul style="list-style-type: none"> ■ Allocation and management of physical access to facilities ■ Registration and control of employee benefits (employee meal cards) ■ Car fleet management (control and delivery of vehicles and Galp cards to employees) ■ Registration, control and monitoring of supplier contracts ■ Registration, management and maintenance of the document archive (e.g., proposals, CVs; complementary qualification documentation)
Sales Management	Ensuring participation and managing opportunities	<ul style="list-style-type: none"> ■ Formalization of contracts and management of the respective archive ■ Opportunities management: Preparation, drafting and submission of tenders in accordance with the tender procedure. ■ Registration and management of Unipartner's selection and qualification processes as a supplier on the various public and private procurement platforms. ■ Fulfillment of customers requests
Finance Management	Ensure efficient management of Unipartner's funds to support all business activities and future investments for internal and external affairs	<ul style="list-style-type: none"> ■ Processing the payment of salaries and benefits to employees ■ Management and control of service contracts ■ Payment of suppliers ■ Management and payment of project expenses
Information and Communication Technology Management	Providing Unipartner with the information and communication technology services it needs to carry out its tasks, while ensuring team compliance and data security	<ul style="list-style-type: none"> ■ Control and monitoring of logical access assignments, licenses and security groups ■ Monitoring and control of equipment assigned to employees ■ Monitoring and controlling access to internal applications and networks ■ Managing and supporting the full operation of the network inside and outside the office ■ Monitoring and controlling the security of environments, in accordance with Unipartner's security policy

Treatment	Overall purpose	Specific goals
		<ul style="list-style-type: none"> ■ Maintenance and helpdesk services ■ Customer Support ■ Asset control and management, vulnerability and security incident management
Communication and Marketing	Promote Unipartner and its offer to the market externally by supporting its growth and purpose, and internally by organizing and supporting various employee experience initiatives	<ul style="list-style-type: none"> ■ Organizing and managing internal or external events, whether face-to-face or virtual ■ Promotion of services, solutions and products (e.g. direct marketing actions and campaigns) ■ Photographic record, image capture and audiovisual production, for dissemination on internal and external channels
Quality and Continuous Improvement	Enhancing the excellence and quality of the services provided by Unipartner	<ul style="list-style-type: none"> ■ Assessing and managing customer satisfaction and loyalty (e.g. carrying out and processing customer satisfaction surveys) ■ Management, provision, guarantee and processing of means and channels for obtaining feedback on services, products, interactions with customers and/or suppliers, to ensure quality of service and continuous improvement. ■ Managing Unipartner's certification processes
Contractual customer relationship management	Managing and monitoring project execution	<ul style="list-style-type: none"> ■ Handling and managing project plans, risk plans and project financial plans ■ Monitoring and guaranteeing the delivery of contracted projects/services. ■ Adoption of procedures for closing projects/services.
Complaints Management	Provide, manage and handle the processes and channels for receiving and responding to suggestions, complaints and denunciations	<ul style="list-style-type: none"> ■ Management and processing of the suggestions and complaints channel ■ Management and handling of complaints to ensure compliance with the GDPR. ■ Management and processing of requests to exercise the rights of data subjects to comply with the GDPR ■ Communication and response to requests from regulatory and competent entities
Software development cycle	Developing and implementing platforms and automation for efficient internal and customer processes	<ul style="list-style-type: none"> ■ Requirements gathering ■ Development / implementation of functionalities in development, production and test environments) ■ Elaboration of functional documentation ■ Conducting tests

Treatment	Overall purpose	Specific goals
Unipartner Website Management	Site	<ul style="list-style-type: none"> Request for additional information Registration for events organized by Unipartner or partner organizations Registration for recruitment opportunities or at Unipartner Academies, on our Job Portal <i>Cookie Management</i> (check Política de Cookies)

5. Lawfulness of processing personal data

Unipartner collects and processes personal data for the purposes described above, based on the following legal justifications:

- **for the execution of the contract or pre-contractual diligence:** Unipartner processes personal data necessary for the conclusion, execution, and management of contracts to which the data subject is a party or for pre-contractual procedures at the request of the data subject.
- **to comply with legal or regulatory obligations** to which Unipartner is subject, in particular, to comply with obligations in the field of employment law, social security, or social protection, as well as to exercise or defend legal claims.
- **to defend the legitimate interests of Unipartner or third parties** in the effective and lawful exercise of our activity. Before collecting and processing personal data for the purposes of legitimate interests, Unipartner balances those interests against the rights and freedoms of the data subjects, processing them only where it has concluded that the legitimate interests are equivalent to or outweigh the rights and freedoms of natural persons. In these cases, Unipartner applies additional measures to guarantee the security of your personal data.
- **the explicit consent of the data subject to process this data:** The personal data we process when providing certain marketing content will only be shared after collecting your explicit, free, informed, and unambiguous consent, where this is required by law. In each piece of marketing content, you can click on the option to unsubscribe from the communication (*opt out*) or unsubscribe in response to the e-mail or address.

Personal data will not be used for other purposes that have not been previously identified or unrelated to the purposes for which they were initially collected.

6. Personal data retention periods

Unipartner complies with the legal rules on the retention periods for personal data and may retain it:

- as part of the exercise of our activity for the retention periods required by law, obligations arising from the law remain;
- as long as the obligations arising from the contractual relationship remain;
- for as long as necessary for the provision of the relevant services and for the agreed minimum period;
- as long as Unipartner's rights can be enforced;

- until the end of the litigation or investigation procedure relating to the underlying relationship.

The period for which personal data is stored and retained is strictly necessary and varies according to the purpose for which it is collected and processed. There may be legal requirements to keep data for a minimum period. Whenever there is no legal requirement to keep the data for a specific period, the data will only be stored and kept for the minimum period necessary for the purposes for which it was collected and subsequently processed.

The personal data collected by Unipartner will be kept in a format that makes it possible to identify the data subjects only for the period strictly necessary for the pursuit of the purposes underlying their processing and will be deleted from all electronic media when they are no longer necessary for the exercise of the legal duties entrusted to Unipartner.

Without detriment to the fact that some of this data may be kept for longer periods, namely for the exercise of rights in legal proceedings, for the purposes of the institution's historical and patrimonial archives, or for the processing of statistical data, Unipartner will apply the most appropriate technical and organizational measures in these cases.

7. Security measures adopted to ensure the protection of personal data and their processing

Unipartner is committed to guaranteeing the protection and security of the personal data entrusted to it and has approved and implemented strict rules in this regard. Compliance with these rules is an unquestionable obligation of all those legally accessing personal data.

Given Unipartner's great concern and commitment to defending privacy issues, various physical and logical security measures of a technical, organizational, and management nature have been adopted to guarantee the confidentiality and security of the personal data entrusted to us against its dissemination, loss, misuse, alteration, processing or unauthorized access, as well as against any other form of illicit processing. These measures include:

- ISMS certification in conjunction with ISO 27001 (and consequent full implementation of Annex A controls), ISO 27701 (and consequent full implementation of Annex A and B controls) and ISO 20000-1, for which you can consult our Integrated Management Systems Policy available on our website;
- Security Regulation, which establishes the organization's security standards, namely the handling of information and assets;
- Training and awareness-raising actions for our employees, particularly those who collect and process personal data, directly or indirectly, to ensure compliance with the obligations of privacy, protection and security of personal data;
- Administrative and technical controls to limit access to personal data;
- Technological security measures, including firewall, encryption and antivirus software;
- Physical security measures, including access cards to our facilities;
- Regulations on the transfer and sharing of data with third parties.

Please note that all Unipartner employees follow a network security policy. Only authorized Unipartner employees have access to personal data, and they are also held to the duty of secrecy and confidentiality.

8. Communication and sharing of personal data

Unipartner, within the scope of its activity and in the pursuit of its duties and powers, may communicate and share personal data with third parties of a public or private nature, whenever considered indispensable for the pursuit of its mission, in strict compliance with its legal obligations to respond to requests from public, legal or governmental authorities, or for auditing purposes.

Unipartner may communicate personal data for the above purposes to the following third parties:

- Recruitment partners and Headhunters;
- Lawyers, enforcement agents, and courts;
- Communications required by law to public institutes and organizations (e.g., *SS - Segurança Social* (Social Security) and *AT - Autoridade Tributária* (Tax Authority));
- Banks, insurance companies, and insurance intermediaries;
- Training Entities;
- Medicine and safety at work;
- Client Entities;
- Partner organizations.

Unipartner may also use third parties, known as subcontractors (*under the terms of Article 28 of the GDPR*), to provide certain services or joint controllers (*under the terms of Article 26 of the GDPR*), which may involve access to personal data. When this happens, Unipartner takes the appropriate measures to ensure that the entities that have access to the data are reputable and offer the highest guarantees at this level, which will be duly enshrined and safeguarded in a contract to be signed between Unipartner and the third party.

Any entity subcontracted by Unipartner will process the data in the name and on behalf of Unipartner, with the obligation to adopt the technical and organizational, physical, and logical measures necessary to protect personal data against accidental or unlawful destruction, accidental loss, alteration, dissemination or unauthorized access and against any other form of unlawful processing.

We may also disclose personal data to competent authorities, including courts and regulators, in response to a court order, subpoena, government investigation, or as otherwise required or permitted by law.

In all cases, Unipartner remains responsible for the personal data made available to it.

Please note that we do not provide information to third parties for their *marketing* purposes and do not carry out *marketing* operations for third parties.

8.1 International transfers

Personal information may be transferred to, stored or processed in a country other than the country of collection and origin of the data subjects, including countries outside the EEA. In such cases, we will

ensure that adequate safeguards are in place to protect the personal data transferred, in accordance with and under the terms of the *General Data Protection Regulation*, by concluding data transfer agreements using binding rules with legal force, such as standard contractual clauses approved by the European Commission.

9. Unipartner as a subcontractor

Unipartner ensures strict compliance with the provisions of the GDPR as a subcontractor, guaranteeing the implementation of appropriate technical and organizational measures, safeguarding the rights of the data subject, as well as that the processing of data is limited to the purposes set out in the Data Processing Agreements, related to the scope of service provision.

10. Data subjects' rights

In strict compliance with the applicable legislation on data protection, Unipartner guarantees the right of data subjects to information on the processing of their personal data. Data subjects are granted the following rights at all times:

Access:

Whenever the data subject so requests, they can obtain confirmation and a copy of the personal data processed by Unipartner. You can also access your personal data and obtain the following information:

- reasons why your personal data is processed;
- types of personal data processed;
- entities to whom your personal data may be transmitted, including entities located in countries outside the European Union or international organizations, in which case you will be informed of the guarantees applied to the transfer of your data;
- retention period for your data or, if this is not possible, the criteria for setting this period;
- rights regarding the processing of your personal data;
- if the personal data has not been provided by you, information on its origin;
- the existence of automated individual decisions, including the definition of profiles, and, if so, information on the logic underlying such processing, as well as on the significance and expected consequences of such processing.

Rectification:

Whenever you consider that your personal data (objective personal data provided by you) is incomplete or incorrect, you can request that it be rectified or completed.

Deletion - "Being forgotten":

You can request that your personal data be deleted when one of the following situations occurs:

- the personal data is no longer necessary for the purpose for which it was collected or processed;
- withdraw the consent on which the data processing is based, and there is no other legal basis for it;
- objects to the processing of the data and there are no overriding legitimate interests, to be assessed on a case-by-case basis, that justifies the processing;
- the personal data must be erased under a legal obligation to which Unipartner is subject or
- the personal data has been collected in the context of offering information society services.

The right to erasure does not apply when processing is necessary for the following purposes:

- exercise of freedom of expression and information;
- compliance with a legal obligation that requires processing and that applies to Unipartner;
- reasons of public interest in the field of public health;
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, in so far as the exercise of the right to erasure would seriously prejudice the achievement of the purposes of such processing; or
- declaration, exercise or defense of a right in legal proceedings.

Treatment limitation:

Restricting processing allows the data subject to ask the controller to restrict access to personal data or to suspend processing activities. You can request the restriction of the processing of your personal data in the following cases:

- if you question the accuracy of your personal data for a period that allows Unipartner to verify its accuracy;
- if Unipartner no longer needs the personal data for processing purposes, but the data are necessary for the establishment, exercise, or defense of legal claims or
- if you have objected to the processing until it is established that Unipartner's legitimate interests prevail over yours.

Portability:

The data subject may ask Unipartner to deliver the personal data they have provided in a structured, commonly used, and machine-readable format. You also have the right to request that Unipartner transmit this data to another data controller if this is technically possible. The right of portability only applies in the following cases:

- when processing is based on express consent or the performance of a contract;
- when the processing in question is carried out by automated means.

Opposition:

The data subject has the right to object to the processing of their personal data at any time, for reasons relating to their particular situation, in the following situations:

- When the processing is based on Unipartner's legitimate interest; or
- When the processing is carried out for purposes other than those for which the data was collected, but which are compatible with them. In such cases, Unipartner will stop processing your personal data unless it has legitimate reasons for doing so and these reasons outweigh your interests.

The data subject may also object to the processing of their data for direct marketing purposes, including profiling related to such marketing.

Consent:

Whenever the processing of your personal data is based on consent, Unipartner will ensure that you are provided with all the information necessary for your consent to be a free, specific, unequivocal, and informed expression of will. In these cases, under the terms of Article 7, you have the right to refuse to give consent and to withdraw it at any time without prejudice to the validity of the processing carried out up to that date.

11. Exercise of rights

The exercise of the rights granted to the holder of personal data by the GDPR, as well as making a complaint or request for clarification regarding the processing of their personal data or this Policy, must be carried out by [filling in the appropriate form for the exercise of rights](#) (available on the website: www.unipartner.com), [which should be sent by email to gdpr@unipartner.com](mailto:gdpr@unipartner.com) or [by registered letter](#) with acknowledgment of receipt to:

UNIPARTNER – Unipartner IT Services, S.A

Lagoas Park,
Rua das Lagoas Pequenas, Edifício 5B 5º
Porto Salvo, 2740-245 PORTUGAL

Data subjects can also exercise their rights by sending their request directly to the following email address gdpr@unipartner.com or by registered letter with acknowledgment of receipt to the above address.

The Data Subject must provide proof of their identity. Whenever there are reasonable doubts as to the identity of the natural person submitting the request to exercise their rights, they may request that additional information be provided to confirm the identity of the data subject.

Requests will be answered within 30 days of submission. In situations where it is not possible to comply with the request, the data subject will be informed of the reason for this impossibility and the measures that are underway, within the legally established deadlines.

The information is provided by Unipartner free of charge, except when, *in accordance with Article 12(5)*, the requests made are manifestly unfounded or excessive due to their repetitive nature, in which case Unipartner reserves the right to demand payment of a fee or to refuse to comply with the requests.

Right to Complain

If you have any reservations about the way we use and process your personal data, you have the right to lodge such a complaint, without prejudice to any other administrative or judicial remedy, with the competent Supervisory Authority, designated in the Portuguese legal system, the *National Data Protection Commission* (CNPd) in relation to the processing of data carried out by Unipartner, which can be contacted through the following means:

CNPd – Comissão Nacional de Proteção de Dados

Av. D. Carlos I, 134, 1º

1200-651 Lisboa

Phone: (+351) 213 928 400

Email: geral@cnpd.pt

Site: <https://www.cnpd.pt>

12. Changes to the Privacy Policy

Unipartner reserves the right to amend this Policy at any time, and such amendments shall be duly made available to the holder in an accessible form through the company's various communication channels, namely on its website, www.unipartner.com.

Fernando Reino da Costa

Presidente & CEO

Last date of revision of the Privacy Policy: 18/10/2024