



PRIVACY POLICY
MARCH 15, 2022



PRIVACY POLICY

GreenVolt – Energias Renováveis, S.A. ("**GreenVolt**" or the "**Company**"), understands that the privacy of all people who relate to it is a basic element of the relationship of trust that it intends to achieve with all its workers, customers, suppliers, and partners.

The protection of Personal Data, as GreenVolt's fundamental commitment to its workers, customers, suppliers, and partners, is achieved by GreenVolt through strict compliance with all applicable Personal Data protection legislation in force from time to time, taking into account best market practices, and in accordance with the highest ethical standards.

The companies integrating the GreenVolt Group adopt the necessary and convenient mechanisms for the protection of Personal Data and continuously monitor and mitigate the risks that arise in the field of privacy and data protection, thus seeking to ensure the commitment it has made to all its workers, customers, suppliers, and other partners.

1. Purpose

- 1.1. This policy regulates the retention and processing of Personal Data in the context of the employment, contractual or service relationships established between a Data Subject and GreenVolt (the "**Policy**").
- 1.2. The processing and retention of Personal Data is carried out in accordance with the General Data Protection Regulation ("**GDPR**") and other applicable legislation at any time and applies both during the course of the legal and/or contractual relationship with GreenVolt, and at the time when the processing of personal data is triggered.

2. Scope

The Policy applies, without prejudice to the specific legal framework of their geographies, to all companies affiliated of GreenVolt ("**GreenVolt Group**"), subject to the following rules:

- a) in the case of companies wholly dominated by GreenVolt, their management bodies shall transpose the local implementation of this Policy;
- b) in the case of companies in which GreenVolt exercises control, co-control (Joint



Ventures) or Significant Influence (Associates), GreenVolt representatives present at the management body shall, by effect of the exercise of control, co-control, or Significant Influence promote the adoption of the measures necessary for the local transposition of this Policy;

- c) in the case of companies in which GreenVolt does not exercise significant control or Influence, GreenVolt representatives shall comply with the provisions of this Policy in the performance of their duties and, as far as possible, encourage the adoption of rules and procedures consistent with this Policy.

3. Principles

In order to ensure the Company's commitment to privacy, the Policy is based on the following principles:

- (i) The processing of Personal Data has defined intentions, purposes, and scopes, only being collected and processed the necessary data in the context of the conclusion and execution of formalized contracts with workers, customers, suppliers, and partners, in compliance with the legal obligations that are applicable and that at any time may oblige the companies of the GreenVolt Group to process Personal Data;
- (ii) The processing of Personal Data is done according to necessity and proportionality, only being made a) when requested or consented by customers, workers, suppliers, and partners; or b) as a result of the legal obligations to which GreenVolt is attached;
- (iii) All GreenVolt customers, workers, suppliers, and partners are informed of the collection and processing of their Personal Data, reason for processing, time of retention and share with third parties;
- (iv) All Data Subjects have control over their Personal Data, and they are guaranteed the broad exercise of their rights, as listed in this Policy. GreenVolt Group companies respond to any questions and requests for information addressed to them by data subjects; and

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- (v) GreenVolt frequently monitors compliance with the Privacy Policy by GreenVolt Group members and any subcontracted entities and external service providers.

4. Data Subjects

Any individual, natural person, who has a business, contractual or employment relationship with a GreenVolt Group company ("**Data Subject**").

5. Data controller

GreenVolt is responsible for collecting and processing Personal Data.

6. Category of Personal Data

GreenVolt may collect and process various categories of Personal Data, taking into account the purposes prescribed in Article 8(2), namely, but not limited to, the following:

- a. Personal identification data - name, identification document number and tax identification number and, if individual entrepreneur (ENI), Economic Activity Code;
- b. Additional personal identification data and contact details - address, telephone, email, date of birth, profession, employer and, in the case of ENI, the company's home;
- c. Marital status and household data;
- d. Data related to complaints or requests for information; and
- e. Data relating to GreenVolt's compliance with due diligence duty in compliance with internal policies on the prevention of money laundering and terrorist financing.
- f. Data related to compliance with GreenVolt Group policies.

7. Data protection officer

GreenVolt has appointed a Data Protection Officer ("DPO").

The function of the DPO is to monitor the compliance of data processing with the applicable standards. In addition to the above, the DPO appears as a point of contact with GreenVolt for the clarification of any questions relating to the processing of your data by GreenVolt, and also has the function of cooperation with the respective authorities.

8. Grounds and Purposes

The following are the grounds and purposes on the basis of which GreenVolt may process Personal Data:

8.1. Grounds

- a) Consent: GreenVolt may process Personal Data when the Data Subject has provided his express consent (in writing, orally or through the validation of an option) and prior and if such consent is free, informed, specific, and unequivocal.
- b) Performance of a contract (including pre-contractual due diligence): when the processing of a Data Subject's Personal Data is necessary for the conclusion and execution of a contract concluded between the Data Subject and GreenVolt, GreenVolt may process Personal Data. In this context, proposals preparation, service delivery, contact management, complaints, billing, collection, and payments are included, without limit;
- c) Compliance with a legal obligation: GreenVolt may process Personal Data when it is necessary to comply with a legal obligation to which the GreenVolt Group is subject, such as the communication of data to law enforcement, judicial, tax or regulatory bodies; or
- d) Legitimate interest: Where the processing of Personal Data corresponds to a legitimate interest of GreenVolt or third parties, where the reasons for its use must prevail over your rights of the Data Subjects, Personal Data may be processed. This includes purposes such as seeking to improve the quality of the services provided, or, for example, the detection of fraud (which the company considers to be, by their nature, prevail over the rights of data subjects).



8.2. Purposes

In the context of the above grounds personal data may be collected and processed for the following purposes:

- a) Recruitment;
- b) Training;
- c) Compliance with contractual or legal obligations;
- d) Promotion of rights arising from an employment relationship;
- e) Marketing;
- f) Institutional communication;
- g) Management of requests, complaints or, in general, response to communications;
- h) Collections;
- i) Litigation;
- j) Security control.

9. Retention of Personal Data

9.1. GreenVolt is obliged, under the legally applicable terms, to retain personal data collected on the basis of the grounds and purposes listed in Article 8 of this Policy, without prejudice to the data subject's right to opposition or forgetting and, furthermore, in cases where the Data Subject withdraws his consent, where applicable.

9.2. The retention of Personal Data, physical and digital, will be carried out by GreenVolt for the period strictly necessary, and legally required, after which, the Company will delete, destroy, or anonymize such data.

9.3. The legal time limits payable on this date are in particular as follows:

- a. Recruitment: 5-year term (Article 32 of Law No. 7/2009 of February 12);
- b. Registration of Managers and Employees: period of 5 years after the departure of the manager / employee, during which it is possible to have corrections in matters of a fiscal and social security nature;

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- c. Training and Performance Evaluation: until the termination of the employment relationship;
 - d. Proof of payment of social security and tax authority contributions, salary receipts and wage processing: 10-year term (or 12 years for documents relating to the 2014 and 2015 tax periods), deadline required for the retention of accounting documents (Article 123 CIRC); and
 - e. Health data: the data will be kept for a minimum period of 40 years (Article 46 of Law 102/2009).

10. Security Measures

GreenVolt protects Personal Data against unauthorized access to its Personal Data, for this purpose using security systems, rules, and procedures, in order to ensure the protection of Personal Data, including by preventing unauthorized access to it, improper use, disclosure, loss or destruction.

11. Rights of the Data Subject

The Data Subject has the following rights, in accordance with and for the purposes duly regulated by applicable law:

- a. Right of Access:
The right to access and confirm their Personal Data, to know the purposes underlying the collection and processing of the same and to know the period by which they may be kept.
- b. Right of Rectification:
The right to request rectification of Personal Data in cases where it is inaccurate and request its completeness.
- c. Right of Limitation:
The right to request that the processing of the respective Personal Data be limited, in particular by being suspended or limited to certain purposes.

d. Right to the Deletion of data:

The right to obtain the deletion of the Personal Data, when there are no grounds that justify the retention of Personal Data.

e. Right to Portability:

Right to receive personal data in digital format and direct transmission of personal data to another entity that may be the new responsible for the processing of Personal Data, in cases where possible.

f. Right to Withdraw Consent:

Right to withdraw the consent previously provided in relation to the processing of Personal Data at any time.

g. Right of Opposition:

Right to objects to the processing of Personal Data at any time.

h. Right to Complain:

Right to lodge complaints with the national supervisory authority on the protection of Personal Data, the Company or the DPO.

i. Right to challenge automated decisions:

In cases where the processing of Personal Data is carried out exclusively automatically (i.e., without human intervention), the Data Subject has the right not to be subject to any decision that is produced as a result of exclusively automated processing, contesting it. To entitle this right, the Data Subject is entitled to human intervention.

12. Sharing Personal Data with third parties

12.1. Data Subjects' Personal Data will not be marketed or sold to third parties.

12.2. Without prejudice to the preceding paragraph, Personal Data may be shared with third parties where necessary for the purposes of fulfilling contractual, legal, or legitimate interest obligations (unless such interest should not prevail over the interests or fundamental rights and freedoms of employees) of the companies that are part of the GreenVolt Group.



13. Exercise of rights

- 13.1. The exercise of the rights of the Personal Data Subject is free of charge.
- 13.2. The Data Subject may request, in the exercise of his/her rights, the provision of information in writing or orally.
- 13.3. Any requests addressed to GreenVolt are answered within a maximum of 30 days, except in cases of especially complex requests.
- 13.4. The address for the purpose of exercising duties is as follows in this Article is as follows: dadospessoais@greenvolt.pt

14. Final provisions

- 14.1. This Policy shall enter into force on the date of its approval by the Board of Directors.
- 14.2. Any amendment to this Policy shall be approved by the Board of Directors, with the power of delegation to the CEO, with respect to the changes necessary to conform the Policy with the legislation in force at any time.



APPENDIX - SETTINGS

1. **"Personal Data"** means any information, of any nature and in any form, relating to an identified or Identifiable Natural Person.
2. **"GreenVolt Group" or "Group"**: means the group of companies owned and associated with GreenVolt – Energias Renováveis, S.A. and constituted by its subsidiaries.
3. **Identifiable Natural Person**: The person who can be identified directly or indirectly, for example by name, identification number, location data, electronic identifier or other elements enabling the identification of that natural person, is considered identifiable.
4. **Company**: means GreenVolt - Energias Renováveis, S.A.