

## P-004CA | Personal Data Protection and Privacy Policy - Service Providers

### Personal Data Protection and Privacy Policy - Service Providers

Floene Energias, SA (Floene), and the companies of the Floene Group, process personal data of service providers and / or employees of service providers who carry out activities in their facilities to execute the contracts they enter into (hereinafter "Providers "), for various purposes.

This Personal Data Protection and Privacy Policy provides detailed information on how Floene, and the companies of the Floene Group, treat the personal data of its Providers in accordance with the applicable legislation on the protection of personal data and privacy.

#### 1. Who is responsible for the processing of your personal data?

Floene, or the companies of the Floene Group, with whom the service provider has entered into the contract that presupposes the performance of the activity at its facilities is responsible for the processing of your personal data.

#### 2. What personal data is processed?

Floene, and the companies of the Floene Group, can process various categories of personal data, namely:

Personally Identifiable Information	Full name, age, height, weight, sex, date of birth, address, nationality, place of birth, language, identification document, photo, SSIN, TIN, signature, driving license, geographical location, video images, proof address
Contact details	Such as phone / cell phone number, internal extension, fax number, email address, IM address, date / time of contact, place of origin of the contact, preferential contact, contact person, emergency contact, IMEI
Data related to the professional situation	As an employer, mechanographic number, professional category, function, functional group, organizational unit, professional situation, workplace, department / area, date / time of entry / exit, type of contract, duration of contract, criminal record
Training data	As training name, training area, training initiative, training period, training duration, training schedule, training qualification level, training assessment, literacy skills, skills, professional qualification
Data on payment methods and transactions	Such as account number, IBAN, transaction number, transaction description, transaction date, transaction amount, number of transactions, card number, card name, card activation date, card expiration date, CCV , BIN code, check number, electronic invoicing, invoice number, SEPA mandate



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Health data	Such as the doctor's professional ID number, disability indicator, type / degree of disability, special needs, doctor's statement on the worker's ability for work
Contract data	Such as contract number, date of signature, customer or supplier code, intervention number, history of supplies, products and services, quantity of products and services, value of products and services, date of purchase of products and services, place of purchase, discounts, consumption history
Vehicle data	As registration, vehicle make, vehicle model, parking space
Insurance-related data	Such as type of insurance, insurance policy number, insurance start date, insurance validity, insurance company, insurance receipt date, claim date, claim number, claim reporting date, description of the occurrence, incident location, green card number, amount of compensation
Data from satisfaction surveys	As satisfaction index, preference factors, opinion, areas of interest
Data related to legal proceedings	Such as lawsuits, number of judicial proceedings, litigation proceedings, type of proceedings, outcome of proceedings, amount petitioned, criminal offenses and claims, identification of the last due diligence, date of the last due diligence, preferential credits
Authentication and access data	As user account, username, password, date of creation, validity of access, registration of entries and exits
Web browsing data	As electronic identifier (Mac, IP), connection start date / time, connection end date / time, web browser origin site, visited URL, website, host name

### 3. How does Floene, and the companies of the Floene Group, collect your personal data?

Floene, and the companies of the Floene Group, collect your personal data directly or, mostly, through indirect collection, that is, from information provided by the entity with which the company



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signed the service provision contract that presupposes the execution of the activity in its facilities. Your personal data can also be obtained from other Departments or employees of Floene companies or Floene Group companies. In certain circumstances, your personal data may also be collected via monitoring devices (e.g. through video surveillance systems), within the limits permitted by applicable law.

### 4. What are the purposes and legal grounds for the processing of your personal data?

Your personal data is processed for the purposes of managing the contractual relationship and security of people and property, the main processing activities being identified in the table below:

Treatment activities				
Training	Safety and Health		Insurance management	
Administrative management	Financial management	Economic and accounting management		Litigation management
Opinion Surveys	Profile definition and analysis		Audits	Management of websites and applications
Physical access control		Logic access control		Geolocation Video surveillance
Device monitoring		Traffic data management		Logic access control
Cookie Management	Sending notifications and alerts		Contract management	Events organization and management
Hobbies and contests	Management and maintenance of information systems and technologies		whistleblowing	

In any activity, the processing of personal data is legitimized by one of the following grounds of lawfulness:



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- Execution of the contract to which the Provider is a party or the pre-contractual steps necessary to effect its contracting;
- Legitimate interest pursued by Floene, by the companies of the Floene Group or by a third party except if the Provider's fundamental interests or rights and freedoms that require the protection of his personal data prevail;
  - Compliance with a legal obligation to which Floene, and the companies of the Floene Group, are attached;
- Provider Consent;
- Defense of the Provider's vital interests, in case he is physically or legally incapable of giving his consent;
- Exercise of functions of public interest or exercise of public authority in which Floene, and the companies of the Floene Group, are invested.

### 5. What is the period of retention of my personal data?

Your personal data will be kept for as long as necessary for the purpose for which it was collected and / or is being processed. As a rule, data are kept for up to one year after the term of the service provision contract, which presupposes the execution of the activity at the facilities of Floene or of the companies of the Floene Group, with the possibility of adding any other period resulting from the fulfillment of a legal obligation. applicable to the company (and for the period defined therein) or, in the event of an administrative or judicial proceeding, up to 6 months after the final judgment of the respective judgment.

### 6. Who are the recipients of my personal data?

If there is a legitimate interest in sharing intra-group data, your personal data may be transmitted, for internal administrative purposes, to other companies in the Floene Group.

Your personal data may also be provided to companies contracted to provide services to Floene or to companies in the Floene Group. These companies (subcontractors), linked to Floene, or Floene companies, by written contract, can only process your personal data for the purposes specifically established and are not authorized to process it, directly or indirectly, for any other purpose, in own or third party benefit.

Your personal data can also be shared with entities with whom Floene, or companies of the Floene Group, establish partnerships, under joint liability agreements.

In compliance with legal or contractual obligations, your personal data may be transmitted to third parties, for the purpose of pursuing their own purposes, namely to banks and insurance companies, judicial, administrative, supervisory or regulatory authorities and entities that carry out, lawfully, compilation actions data, actions to prevent and combat fraud or statistical studies.

Floene, and the companies of the Floene Group, may also transfer their personal data outside the European Economic Area, if justified in the context of the execution of a contract or in compliance with a legal obligation, ensuring that the data are only transferred under a European Commission



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suitability decision or standard data protection (or similar) clauses approved by the European Commission.

### 7. How will my personal data be treated?

Your personal data are processed by Floene, or by the companies of the Floene Group, in the context of the aforementioned purposes, in accordance with the Group's internal policy and standards and using appropriate technical and organizational measures to promote their security and confidentiality, namely in relation to the unauthorized or unlawful treatment of your personal data and the respective accidental loss, destruction or damage. Your data can also be further processed for statistical purposes.

Image data may be used, if not opposed, in unrevised, revised or edited format, in the Floene press database, or in the Floene Group companies for informational and non-commercial purposes and also in Floene accounts, or Floene Group companies created on social networks.

### 8. What rights do I have over my personal data?

As a data subject, you have the right, whenever applicable: i) to request access, rectification, limitation, opposition, portability and erasure of your personal data, (ii) file a complaint with the competent supervisory authority or (iii) obtain repair and compensation, if it considers that the treatment carried out violates your rights and the applicable personal data and privacy legislation.

You can exercise your rights enshrined in the applicable legislation on personal data and privacy by emailing [data.privacy@floene.pt](mailto:data.privacy@floene.pt) or by internal mail, to the attention of the Floene Ethics Committee.

You can also contact the Floene data protection officer for any questions related to the protection and privacy of your personal data by emailing [DPO@floene.pt](mailto:DPO@floene.pt).

### 9. Other privacy notices

Without prejudice to the information contained in this document, Floene, and the companies of the Floene Group, may process other personal data or additional data categories, when necessary for the pursuit of a certain purpose and in accordance with the applicable legislation, and you will be notified in advance of such personal data processing.

### 10. Changes to the Personal Data Protection and Privacy Policy

Floene, and the companies of the Floene Group, may, at any time, change this Personal Data Protection and Privacy Policy in accordance with new legal or regulatory requirements or proceed with the respective update, if justified. We advise you to consult this Policy regularly to check for the most up-to-date versions.

Last updated date: October 24<sup>th</sup>, 2022