

PRIVACY POLICY

1. FRAMEWORK

The party responsible for processing the personal data of users of this website is **PSA Sines - Terminais de Contentores, S.A.**, with registered office at Terminal de Contentores de Sines, Apartado 195, 7521-903 Sines, with the single registration and taxpayer number 504 605 534 ("**PSA**").

PSA ensures compliance with the obligations arising from Regulation (EU) No 679/2016 of the European Parliament and of the Council of 27 April 2016 (hereinafter "GDPR") and other legislation on personal data protection and privacy.

Respect for the privacy of its users, the protection of their personal data and compliance with the legal obligations applicable in this field is a priority for **PSA, which is why** we are committed to processing only those personal data that are strictly necessary to pursue our purposes or legal obligations, ensuring respect for their privacy, transparency of information and the application of best practices in the field of security and protection of personal data.

This Privacy Policy aims to provide information on the processing of personal data of the holders of personal data (hereinafter also referred to as "User" or "Users"), collected in connection with the use of this website www.psasines.pt (hereinafter "Website"), by **PSA**.

For this purpose, Users of the Website shall be deemed to be, but not limited to:

- i. Website visitors;
- ii. Visitors who wish to apply as an employee for **PSA** job opportunities;
- iii. **PSA's** customers and potential customers.

The Privacy Policy applies exclusively to the processing of personal data carried out by **PSA** in the context of the purposes established herein, in which personal information is considered to relate to a natural person, of any nature and regardless of its support, which identifies or allows the identification of this person.

Should you need to contact us to clarify any doubts or to obtain additional information about this Policy, you may do so through the contact form or by calling us at (351) 269 870 600.

2. CATEGORIES OF PERSONAL DATA PROCESSED

In the context of the purposes stated, **PSA** processes only the personal data strictly necessary for the pursuit of these purposes, namely:

- Personal identification data (e.g. full name, e-mail, telephone);
- Recruitment (e.g. application date, interview result, result of admission tests or examinations, curriculum vitae and certificate of qualifications);

PSA does not process sensitive data categories such as racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, among others.

3. PURPOSES OF PROCESSING PERSONAL DATA, GROUNDS FOR LAWFULNESS AND RETENTION PERIODS

The User may access, browse and use this website without providing any personal information, without prejudice to the navigation data required for the correct management of the Website. However, the use of certain tools of the Website may require the provision of personal data.

In this context, data processing has the following purposes, grounds for lawfulness and retention periods:

Grounds for Lawfulness	Purposes	Conservation period
Consent	<p>We process your personal data subject to consent, which we will ensure is given by you freely, specifically, informed and unambiguously:</p> <ul style="list-style-type: none"> • For recruitment data collection to be considered for similar vacancies to those you have applied for; • Spontaneous applications. 	Up to one (1) year after collection of consent or last interaction.
Pre-contractual due diligence and/or performance of a contract	<p>We process your personal data within the scope of this ground of lawfulness for the following purposes:</p> <ul style="list-style-type: none"> • Website information management; • Recruitment process; • Management of the contractual relationship with customers and other entities in the context of a commercial relationship with PSA; • To provide our services. 	<p>For three (3) months after the last visit to the Website;</p> <p>Up to 1 (one) year after the last interaction, in case the candidate is not selected, and during the period in which the professional relationship is maintained, in other cases;</p> <p>Up to 1 (one) year after the end of the contract or, if the contract has not been</p>

		concluded, up to 6 (six) months after the beginning of the contracting process without conclusion.
Compliance with legal obligation	<p>When the processing is necessary to comply with legal obligations, your personal data will be processed and may, if necessary, be transmitted to official entities, namely:</p> <ul style="list-style-type: none"> • For the purposes of receiving, analysing/following up and responding to complaints and/or reports of misconduct ("Whistleblowing"). 	<p>For claims, for a period of 3 (three) years;</p> <p>For complaints, during a period of 5 (five) years and, without prejudice to this period, during the pendency of judicial/administrative proceedings relating to the complaint.</p>
Legitimate Interest	<p>We process your data on the basis of legitimate interest of PSA, namely:</p> <ul style="list-style-type: none"> • To receive, analyse and respond to requests for information and/or complaints; • For the purpose of adapting the services we provide to the needs and interests of our clients and business partners; • For the purpose of the events we hold and their dissemination. 	Until 1 (one) year after the last interaction or contact.

If the lawful ground for processing your personal data is consent or legitimate interest, you may respectively withdraw consent or object to the processing at any time, without any consequence for you, but without this compromising the lawfulness of the processing carried out in the meantime. If consent is withdrawn or you expressly object, we will immediately cease processing your personal data for the purpose in question, unless the processing of such data is necessary for compliance with legal and/or contractual obligations.

We only keep your personal data for the period strictly necessary to fulfil the purposes identified above, within the legal limits. Once the defined retention period has expired, we undertake to delete, destroy or anonymise your personal data. With the exception of data that we are required by law to store for a longer, legally stipulated period, we will generally delete your personal data once your questions and requests have been answered and properly resolved, the services you requested from us have been rendered, or the warranty periods for the items you purchase or repair have expired.

4. SHARING OF PERSONAL DATA

In certain cases, **PSA** may disclose your personal data, to the extent strictly necessary, to entities providing services to us ("Subcontractors"), for the performance of the above-mentioned purposes.

PSA has concluded a written contract with the subcontractors, and they may only process your personal data for the purposes established and are not authorised to process it, directly or indirectly, for any other purpose, for their own benefit or for that of a third party.

If there is a legitimate interest in intra-group data sharing, your personal data may be transmitted for internal administrative purposes between **PSA** Group companies.

Your data may also be communicated to authorities or third parties when the transmission is carried out under a legal and/or contractual obligation, a decision by the CNPD or another relevant supervisory body, or a court order.

Under no circumstances do we share your personal data with other companies or brands for commercial purposes.

5. TRANSFERS OF PERSONAL DATA

Your personal data is not transferred outside the European Economic Area (EEA). Exceptionally, **PSA** may need to use solutions and service providers located outside the EEA. In such cases, **PSA** will ensure that your personal data enjoy a high level of protection under the applicable legislation on personal data by regulating the transfer under an adequacy decision of the European Commission or via standard contractual clauses approved by the European Commission (Implementing Decision (EU) 2021/915, 4 June) or similar.

6. RIGHTS OF DATA SUBJECTS

Under the terms of the applicable law and as holder of personal data, the User may at any time request the right to access, rectification, erasure of their personal data, limitation of processing, portability, objection and not to be subject to automated decisions.

The exercise of these rights depends on the verification of certain legal and circumstantial requirements, and the invocation of any of them and the respective admissibility of exercise shall be subject to case-by-case analysis by the **PSA**.

Where you have given consent for a particular processing, you may withdraw it at any time for the future.

To exercise any of these rights, you must do so by writing to the following address:

- Terminal de Contentores de Sines, Apartado 195, 7521-903 Sines

Or via the email address sct-comunicacao@globalpsa.com

The **PSA** will follow up on any exercise of rights as soon as possible and within the timeframe set out in the applicable legislation.

Without prejudice to any other administrative or judicial remedy, the User may also lodge a complaint with the competent supervisory authority regarding matters relating to the processing of his/her personal data.

In Portugal, the competent supervisory authority is the National Commission for Data Protection - CNPD. For more information, please go to www.cnpd.pt.

7. PERSONAL DATA PROTECTION OFFICER

Any User, as the holder of personal data, may contact the Personal Data Protection Officer on all matters relating to the processing of their data and the exercise of the rights conferred on them by applicable law and, in particular, by this Privacy Policy, via the contact form on this Website at www.psasines.pt.

8. INFORMATION ON COOKIES

We advise you to read the Cookies Policy, made available on this Website at www.psasines.pt, to find out more information about the processing of your personal data carried out through these functionalities.

9. SECURITY MEASURES

PSA makes its best efforts to protect Users' personal data, and to this end has at its disposal appropriate technical and organisational measures and a variety of information security measures in line with best national and international practice, including technological controls, administrative, technical, physical and procedural measures to ensure the availability,

authenticity, integrity and confidentiality of Users' personal data, preventing their misuse, unauthorised access to data, disclosure, loss, improper or inadvertent alteration or destruction.

Given the permanent technological evolution, we periodically review and improve the implemented measures and we invest in the regular training of our employees, respecting, without exception, the internal procedures defined and implemented.

It is, however, the responsibility of the Users to guarantee and ensure that the devices and equipment used to access this Website are adequately protected against harmful *software*, computer viruses and *worms*.

10. LINKS TO OTHER WEBSITES

PSA may provide hyperlinks to other websites of interest or partners and is not responsible for the Privacy Policy, *Cookies* Policy or Terms and Conditions of Use of these websites. We recommend that, when accessing other websites, you consult all available legal information.

When you choose to follow us on social networks, when you interact with us on these platforms, or when you access the Website through these platforms, your personal data may be processed by the entities managing the social networks or functionalities made available, in accordance with their respective Privacy Policies, which we recommend that you read.

11. CHANGES TO THE PRIVACY POLICY

PSA reserves the right to revise and amend this Privacy Policy at any time. These changes will be duly publicised on the Website, and we therefore advise you to read and consult it regularly.

Date of last modification: 31/03/2023