Privacy Statement

The protection of your privacy is of great importance to the Thomas & Piron Group.

This data protection statement describes how the THOMAS & PIRON Group saves and uses the various data, how it protects it and guarantees that this data is not used for profit-making purposes. It also informs you of your rights regarding this data in accordance with European Regulation 2016/679 (GDPR).

In this document, the THOMAS & PIRON Group is referred to as "TP".

Scope of the agreement on the use of personal data

By providing agreement when entering or communicating personal data or when concluding a contract, the customer consents to the collection and use of their personal data in the manner set out in this article.

We collect personal data (surname, first name, address, telephone number, e-mail address).

The customer agrees explicitly and freely to their data being used for advertising, commercial or marketing purposes and agrees to receive promotional material and information by email, telephone or post. This authorisation can be withdrawn at any time upon request and commercial opt-ins will be automatically cancelled after 30 months without activity.

The customer agrees that their data may be passed on to our employees and subcontractors for the purpose of performing the services entrusted to us.

The customer is advised that we are responsible for the use by third parties of the data transmitted in this way. We will ensure that third parties comply with the current applicable regulations governing the processing of personal data.



Data collection

Personal data includes your name, address, date of birth, e-mail address, telephone number, metadata and any other private information that you may have communicated to us while managing your file or when you request information from us.

TP collects your personal data when:

- you visit our website (cookie policy)
- you request information by phone, by e-mail, or via the contact form on our website
- you sign a contract
- you subscribe to our newsletter

Your data is not encoded in our general databases, but in a separate database processed by project personnel only.

Reasons for data entry

Most of the services offered by TP require the registration of your data so that we can:

- follow up on your file both for the execution of the contract and for the application of convention and legal guarantees thereafter.
- suggest products that meet your expectations within the framework of our commercial prospecting activities
- respond to your requests for information
- carry out satisfaction surveys
- register external visitors who access our facilities
- send you our newsletter
- send you personalised magazines

The personal data you have provided will only be used for these specified purposes.

The nature of the information collected may vary according to the situation and depends specifically on the type of contract you have signed.

We draw your attention to this point when you sign.

You may be asked about your first name, last name, address, age, year of birth, gender, e-mail address or other information relevant to your case.

TP limits the collection and processing of personal data to that which is absolutely necessary, and if any data is passed on to third parties, it will always be for the reasons given above.

We guarantee that your data will not be sold on to third parties.



Legal basis for the processing of personal data

We collect and use your personal data only <u>if at least one</u> of the following conditions applies:

- we have your consent: by submitting your personal data, you give your consent to their storage and processing in accordance with this declaration;
- it is necessary to perform a contract with you or to take steps at your request before entering into a contract, during the performance of this contract or afterwards for the purposes of the guarantees linked to it;
- it appears to be necessary to comply with a legal obligation;
- it is in our or a third party's legitimate interests, and these are not overridden by your interests or rights.

Duration

Your IP address and the name of your internet service provider, which we store for security purposes only, will be deleted after seven days. Otherwise, we delete your personal data as soon as the purpose for which we collected and processed it ceases to apply. After this point, data is only stored if required by the laws, regulations and other legal provisions of the European Union or a Member State of the European Union to which we are subject.

In the context of commercial processing, the collected data will be used for a period of 30 months from your last contact with a TP Group company. Beyond that, the data will be deleted.

Use, sharing and transmission to third parties

TP stores and processes your personal data in a database shared by all TP Group companies.

TP undertakes not to transmit your personal data to any third party outside the TP Group except to our carefully selected subcontractors, business partners, or distribution partners, strictly to the extent necessary to perform their work or services, with respect to your contract, for our commercial promotion activities, or to measure the quality of our service as indicated under the heading "Reasons for data collection".



TP requires any third party that has access to your personal data for the above-mentioned purposes to ensure its protection by complying with the same standards as TP. Your personal data will not be used for any purpose other than that expressly prescribed by TP and in accordance with the legal bases set out above.

We may also need to share personal data in these exceptional cases, as in the event that it is necessary to establish, exercise or defend our rights, which is justified by our legitimate interest.

When we share personal data with third parties, we ask them to comply with the regulations, keep the data secure and not use it for their own commercial purposes.

Features of social networks

Our websites may contain features from social networks such as Facebook, Twitter, Google+ and Pinterest, which have their own privacy policies.

Please read their terms and conditions and privacy notice carefully before submitting your personal data to these sites, as we do not accept any liability for these features.

Cookies

We record your behavioural data when you visit our website. This is data resulting from the use of cookies and logging.

Use of cookies

Cookies are information files that are automatically stored on your computer's hard drive when you visit our site, and include a unique identification number. Their purpose is to simplify access to and navigation on the site. They may also be used to personalise commercial offers from TP and allow us to provide you with this targeted commercial advertising.

Types of cookies

Our website currently uses both session cookies and permanent cookies.

Session cookies: these cookies will have disappeared the next time you visit our site.

Permanent cookies: these cookies are not deleted at the end of your session.

If you want them to disappear, you can delete your browsing history by requesting the deletion of cookies. The deletion method differs depending on the browser you are using. We recommend that you consult your browser's help function for the best way to remove unwanted items.



Purposes for which cookies are used

Necessary for the proper functioning of the site (functional cookies)

Necessary cookies help make our website usable by enabling basic functions such as page navigation and access to the secure areas of the website. The website cannot function properly without these cookies.

Preference management (functional cookies)

The cookies used record your browsing preferences and allow us to improve the user-friendliness of our site (the choice of language for example).

Statistical analysis of traffic (analytical cookies)

Our website uses cookies generated by the Google analysis service: Google Analytics. To guarantee the highest level of protection, **Thomas & Piron decided to submit the placement of these cookies to your consent.**

The information transmitted to Google via this service is purely statistical and enables Google to provide us with reports on user behaviour and offer us services to optimise the functioning of the website. Therefore, if this level is not chosen, we will not be able to receive information that will improve usability and the quality of your experience of our site.

Placed by third parties (third-party cookies)

Some cookies provided by third-party partners are needed to access certain content. To guarantee the highest level of protection, **Thomas & Piron decided to submit the placement of these cookies to your consent.** Therefore, if this level is not chosen, content such as videos, maps, social media or sounds may be blocked. You can view the list of third-party cookies by clicking on the "More info on cookies" link at the bottom right of this window.

Examples of allowed features

- remembering login information and provide secure login
- remembering the items in your basket
- allowing you to play video or audio content hosted on third-party sites
- allowing third parties to provide tools for sharing content on social networks

Cookie management

Your browser allows you to accept or decline the use of cookies and notifies you each time a cookie attempts to be installed. You are free to decline these cookies, although this may affect the optimal navigation and functionality of the services on the site.

Please consult your browser's help function for more information.

Here is the data that can be collected via cookies:

- the IP address that was assigned to you when you logged in
- the date and time you accessed the site
- the pages you consulted while connected to your browser



- any browser you used
- the platform and/or operating system installed on your computer
- the search engine and keywords used to find the service site
- downloaded files
- the choice of language
- the site via which you arrived

This data will only be processed to find out the number of users of the different sections of the services and to improve the content of the services.

Security

TP takes all the necessary measures to ensure that the personal data entered can be relied upon to be accurate, complete and suitable for the stated purpose.

TP applies appropriate technical and organisational security measures to ensure the protection of your data against loss, misuse, manipulation or unauthorised access.

We also take steps to update our security systems to address new and known risks. However, we emphasise that it is not possible to guarantee the absolute security of personal data. Please note that data transmissions over the internet, in particular the sending of e-mails, are never completely secure or error-free. We therefore recommend that you protect your computer and access data from misuse.

Right of access

You have the right to ask at any time what data has been collected, how long it will be kept and for what purpose.

Right of rectification

Please always update the data you have provided to us, for example by informing us of your new address, e-mail address, or any change of name. This will allow us to provide you with information that best meets your needs.

You should check and correct all the data you have given us. But this right is subject to certain restrictions. To ensure that your personal data is protected against unauthorised access or modification, we check the identity of the person who requests access to or the rectification of your personal data.

Right of revocation

You can revoke your consent to the use of the data provided at any time, except for what is strictly necessary for the processing of your file during the execution of the contract and its guarantees, for our legitimate interest, for compliance with a legal obligation and for the defence of our rights.

If TP intends to use personal data for a purpose other than that previously specified, you will be informed of this intention and given the opportunity to refuse this change.

Changes to our privacy statement

We may change our statement at any time. Therefore, please check our website(s) regularly for any updates.

Contact

You therefore have the option to correct, modify or delete, at any time, the personal data you have submitted to TP and that is not necessary for the processing of your file, as well as the possibility of finding out what personal data is stored on our servers by sending us a letter by post or an email to the following address:

THOMAS & PIRON Holding SA

The data controller

Web: www.thomas-piron.pt Email: privacy@thomas-piron.pt

Complaints

Please contact the above-mentioned data controller if you have any problems.

However, you have the right to lodge a complaint with the Data Protection Authority if, after contacting us, you believe that we have not processed your personal data in accordance with the applicable regulations:

National Data Protection Commission

Av. D. Carlos I, 134, 1º 1200-651 Lisbon https://www.cnpd.pt/ geral@cnpd.pt

