

PRIVACY POLICY JOSÉ AVILLEZ GROUP, S. A.

Grupo José Avillez, S. A. (henceforth referred to as "**Grupo José Avillez**"), throughout the years, has been looking to maintain solid and lasting relationships with its clients, based on transparency and trust. This Privacy Policy describes who we are, for what ends do we use the subjects' data, how we process and store it, with whom we share it with, for how long we keep it, as well as ways to contact us and exercise your rights.

Who we are

Your personal data will be processed by **Grupo José Avillez**, collective person n.º. 509 311 865, headquartered at Rua Nova da Trindade, 18, 1st floor, in Lisbon, phone number +351 214 812 245.

Grupo José Avillez is responsible for processing the personal data that it collects, processes and stores, in the sense that such expressions are defined by the General Data Protection Regulation (or "GDPR").

Sharing and transferring personal data

José Avillez Group shares data with third parties, according to the legal terms, under the duty of cooperation, namely, the Food and Economics Safety Authority, the Work Conditions Authority, the Tax and Customs Authority and Social Security.

Grupo José Avillez may, also, transfer the data to service providers that act exclusively under **Grupo José Avillez'** guidance or for **Grupo José Avillez'** support, and respect technical and organizational measures equivalent to those to which is obliged to.

For how long do we keep your information?

Grupo José Avillez only keeps the personal data for the period of time necessary for the fulfilment of the purposes for which these were collected for. The deadlines for keeping most personal data processed by **Grupo José Avillez** result of either the law or of contracts that it celebrates with customers, suppliers and partners. **Grupo José Avillez** only collects and processes data based on **Grupo José Avillez** legitimate interest or with the subject's consent exceptionally.

Exertion of rights by the data subject

At any given time, the data subject may:

- Request access to the information - the personal data subject has the right to have confirmation that the data that pertains to him/her are, or not, subject to processing and, when applicable, access his/her personal data and access the information established by law.
- Request the correction of the information in case it's either inexact or incomplete - the personal data subject has the right to have the inexact or incomplete data that concerns him/her corrected by **Grupo José Avillez**, without unjustified delay.

- Request the deletion of his/her personal data - the subject of the personal data has the right to request to **Grupo José Avillez** the deletion of his/her data, without unjustified delay and **Grupo José Avillez** has the obligation to delete the personal data, without unjustified delay, in case one of the following reasons applies:
 - The personal data are no longer necessary for the purpose that motivated its collection or treatment;
 - Opposes the processing if there are no legitimate prevailing interests that justify the processing; or
 - Has withdrawn his/her consent for the processing of data (whenever the processing is based on consent) and there is no other reason for said processing.
- Request the limitation of the processing of his/her personal data – the personal data subject has the right to request the limitation of the processing of his/her data to **Grupo José Avillez**, when applicable, namely, on one of the following situations:
 - Challenge the exactness of the personal data, for a period that allows **Grupo José Avillez** to verify its exactness;
 - Data processing is licit and the data subject opposes the deletion of the personal data and requests, in return, the limitation of its use;
 - **Grupo José Avillez** has no longer any need for the personal data for processing purposes, but that data is requested by the holder for purposes of Statement, Exercise or Defence of a right in a legal process;
 - If the subject has contested the processing, until it is verified that the legitimate reasons of the subject responsible for the processing prevail over those of the data subject.
- Opposes the treatment of his/her personal data - the data subject may oppose the processing of his/her personal data when the data processing is valid for the legitimate interests pursued by **Grupo José Avillez**. In this situation, **Grupo José Avillez** may demonstrate the existence of legitimate grounds that may prevail over the legitimate grounds of the data subject.

The data subjects may, at any time, exert their rights, through the email address geral@joseavillez.pt or through letter addressed to Rua Nova da Trindade, 18, 1º andar, 1200-302 Lisboa.

They may also contact the Data Protection Officer at <mailto:dpo@joseavillez.pt>.

They may also choose to contact the Control Authority who, in Portugal, is exerted by the National Commission for Data Protection, by sending a message to <mailto:geral@cnpd.pt>.

GRUPO

JOSÉ AVILLENZ

Technical, organizational and security measures

Grupo José Avilenz implements and guarantees the maintenance of adequate means of protection, in such a way that its internal procedure for the security of the personal data is in conformity with the regulations in force. **Grupo José Avilenz** develops, also, all the necessary efforts to ensure that, contractually, the third parties with whom it collaborates with, as partners or service providers, guarantee an adequate protection of the personal data to which they may have access to. **Grupo José Avilenz** limits the access to personal data to specific collaborators and solely when the contact with this personal data is justified in the scope of their functions.

Grupo José Avilenz takes the necessary measures to guarantee the secure treatment of the personal data. In particular, it takes precaution measures to protect the personal data against loss or abuse, and uses security procedures to avoid unauthorized access to this personal data.