



Information on the processing of personal data

Information on the processing of personal data in accordance with Articles 13 and 14 of the GDPR

With regard to the receipt and management of complaints under the terms of Law 93/2021 of 20 December, on the protection of whistleblowers of offences that harm the public interest or the integrity of the Company ("Whistleblowing Communications" or "Communications"), in accordance with the procedure for the use and management of the breach communication channel, adopted by doValue Portugal Unipessoal Lda and available on the website at the following link <https://dovalue.pt/Whistleblowing-en> (the "Reporting Procedure" or "Procedure"), pursuant to and in accordance with Articles 13 and 14 of EU Regulation 679/2016 on the protection of personal data (GDPR),

doValue Portugal Unipessoal Lda is responsible for processing the data relating to communications of irregularities addressed to it, as well as providing the privacy policy relating to the processing of personal data.

Categories of data, purpose and legal basis for processing

They can be treated:

- the personal data of the author of the complaint (Complainant), except in the case of an anonymous complaint ("anonymous complaint", as better described below), such as the name, surname and e-mail address voluntarily provided by the user in the context of the complaint;
- the personal data of the person mentioned or involved in the report ("Whistleblower Target"), such as, by way of example, name, surname, email address, function, qualification and any other data provided voluntarily by the Whistleblower to represent the alleged illegal conduct of which he/she has become aware in the work context and relating to the violation of internal and external rules, as defined by Art. 2 of Law 93/2021 of 20 December, including the principles and rules of conduct contained in the Code of Ethics, anti-corruption, anti-money laundering, employee health and safety regulations, and all other external regulations identified from time to time.

Data can be collected using the following reporting channels:

- BY EMAIL: eticapt@dovalue.pt
- BY MAIL: Ethics Line, A/C Compliance Department, Av. da República, 90, Piso 2, 1600-206 Lisboa

The anonymity of the whistleblower's identity is guaranteed by using traditional mail.

In the case of a verbal report made during a meeting with the Compliance Officer and a third party, this can, with the whistleblower's consent, be documented by means of a written report verified and confirmed by the whistleblower himself through a handwritten signature.



Lawfulness of treatment:

- doValue's legitimate interest in combating any illegal behaviour (pursuant to Article 6(1)(f) of the GDPR).

Purpose:

- - The receipt and processing of whistleblowing reports, including any necessary preliminary and investigative activities.

Processing methods and retention times:

The data provided within the framework of the Reports may not be used beyond what is necessary to properly follow up on them. Personal data that is not clearly useful for processing a specific report will not be collected or, if collected accidentally, will be deleted immediately.

Personal data may be processed by manual, computerised or telematic means, but always under the supervision of appropriate technical and organisational measures to guarantee the security and confidentiality of the data relating to the persons involved or referred to in the Reports, as well as the content of the Reports and their documentation, whether you wish to keep your identity secret or decide to reveal it when sending the Report.

Reports and related documentation shall be kept for the time strictly necessary for the processing of the report and, in any event, for a period not exceeding five years from the date of communication of the outcome of the reporting procedure.

Data subjects' rights

You may exercise your rights under the GDPR at any time, including:

- a) access their personal data, obtain evidence of the purposes pursued by the controller, the categories of data concerned, the recipients to whom the data may be communicated, the applicable retention period, the existence of automated decision-making processes;
- b) obtain without delay the rectification of inaccurate personal data concerning them;
- c) obtain, in the cases provided for, the deletion of their data;
- d) obtain the limitation of treatment or oppose treatment, where possible;
- e) lodge a complaint with the data protection authority.

These rights can be exercised by contacting the Data Protection Officer (DPO) using the contact details below.

The Data Controller is:

- doValue Portugal Unipessoal Lda, with registered office at Av. da República nº 90 piso 2, 1600-206 Lisboa

To contact the Data Protection Officer, please write to the above address c/o Compliance Department