

Privacy Policy

The EDPR PT - Promoção e Operação, S.A. (hereinafter, EDPR PT) whistle-blower channel, was created to report any violation of National and European Union standards identified in Law no. 93/2021, of December 20, which establishes the general regime for the protection of whistle-blowers, and transposed the Directive (EU) 2019/1937 of the European Parliament and of the Council, of October 23, 2019, on the protection of persons that denounce violations of European Union Law.

The whistle-blower channel must be used responsibly and prudently. Under the law, the whistle-blower must proceed in good faith and refrain from submitting unfounded allegations.

The complaint can be filed anonymously. Without prejudice to the fact that, in any case, the information contained in the complaint is confidential and is protected against unauthorized access.

If the complaint is not anonymous, the operation of the whistle-blower channel implies the processing of the whistle-blower's personal data by EDPR PT. This Privacy Policy is therefore intended to inform the whistle-blowers about the processing of their personal data collected through the aforementioned whistle-blower channel.

Data from the denounced may also be collected. The communication of privacy information to the denounced will be made at the time of the first contact with him/her, considering the confidentiality of the complaint until that moment. If the complaint does not contain sufficient elements to proceed with the analysis or is not considered valid, no contact will be made with the denounced.

1. What personal data is collected and processed?

The following personal data may be collected:

- From the whistle-blower (if the report is not anonymous): full name, email, mobile phone number and any other data included in the description of the report.
- Of the denounced: the data that the whistle-blower indicates in the description of the complaint.

2. Who is the «responsible for the processing» of personal data?

The data controller is EDPR PT - Promoção e Operação, S.A. with the unique registration number at the Commercial and legal entities Registry 510 412 092, with registered office at Rua Ofélia Diogo da Costa, No. 115, 6º 4100-085 Port, and with a share capital of EUR 57.500,00.

3. Does EDPR PT have a Data Protection Officer?

Yes. The Data Protection Officer may be contacted through the email address dataprotection@edpr.com.

4. What is the purpose and legal basis applicable to the processing of personal data?

The whistle-blower's personal data will be processed by EDPR PT for the purpose of analysing, forwarding and responding to the whistle-blower, as well as for its eventual referral to the competent authorities.

The processing of personal data is necessary for the fulfilment of legal obligations incumbent on EDPR PT, namely regarding the protection of whistle-blowers of infringements, prevention of corruption and combating money laundering and the financing of terrorism.

The data may be processed and kept for statistical purposes, although limited to the minimum necessary for this purpose.

5. To which entities will personal data be communicated?

Personal data may be communicated to the competent national and European authorities to investigate the reported infringement, to the extent that it is necessary for the follow-up of the complaint and permitted by law.

The whistle-blower's personal data may be communicated to a reputable service provider, which will process the data exclusively for the purposes established and in compliance with the instructions issued by the latter, strictly complying with the legal rules on personal data protection, information security and other applicable rules, pursuant to a written agreement between the parties. If the whistle-blower wants specific information about the subcontractors at this headquarters, he/she may request more information by sending a written request to the email address mentioned in point 3 of this Policy.

6. How long will personal data be kept?

Under the terms of the Law, complaints that have as their object non-compliance with applicable legal and regulatory rules will be kept for a period of 5 (five) years that will be counted from the closing date of the treatment of the complaint, and, regardless of this period, the complaints will be kept for the duration of any judicial or administrative proceedings related to them.

Any data that is not considered relevant for the handling of the complaint will be immediately deleted.

For statistical purposes, the data may be kept beyond the aforementioned periods, being anonymized for this purpose.

7. What rights of access to personal data exist?

The whistle-blower, as the data subject, has the right to request access to personal data concerning him/her, as well as its rectification, deletion after the retention period imposed by law, limitation of treatment, opposition to treatment (namely to the treatments carried out based on the legitimate interest of EDPR PT), as well as the right to data portability, all of this under the terms of the legislation in force regarding personal data.

In order to exercise the aforementioned rights, or for any question related to this Privacy Policy, the whistle-blower may contact the data protection officer (DPO) of EDPR PT, whose email address is dataprotection@edpr.com.

The whistle-blower also has the right to file a complaint with the competent Control Authority if he/she considers that the rights over his/her personal data have been infringed.

8. Will there be international data transfers?

EDPR PT will seek to ensure that the processing of personal data takes place entirely within the European Economic Area. Exceptionally and when strictly necessary for the pursuit of the processing purposes described in this Policy, EDPR PT may transfer the personal data collected to third countries or international organizations for which there is an adequacy decision by the European Commission or the transfer is subject to appropriate safeguards provided for by law, such as the conclusion of standard contractual clauses for the transfer of personal data (under Article 46 of the GDPR). When transferring data to third countries or international organizations based on adequate safeguards, EDPR PT will take additional measures to ensure that personal data has a level of protection essentially equivalent to that existing in the European Union.

EDPR PT may update or change this Privacy Policy, in which case, it will publish the new policy on the whistleblowing platform, making it available for consultation.

June, 2022.