

## PRIVACY POLICY

This **Privacy Policy** explains what we do with your personal data. It describes how we collect, use, and process your personal data and, in doing so, how we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your personal data.

Please take a few moments to review our privacy practices. If you have any questions, please contact us by email at **rgpd@primeit.pt**, or by mail at **Avenida 5 de Outubro, nº125, 9º, 1050-052 Lisboa** .

We have tried to keep this Privacy Policy as simple as possible, but if you are unfamiliar with any of the terms used or have any questions, please do not hesitate to contact PRIMEIT CONSULTING, SA for further clarification.

From time to time, we may change this Privacy Policy. If you wish to stay updated, please visit this page, as all changes will be posted here.

### **A. Who collects your personal data and who is the entity responsible for processing it?**

The processing of any personal data collected by PRIMEIT, or provided to it, is the responsibility of the company **PRIMEIT – CONSULTING SA** ., a public limited company, legal entity number 506 396 010, with registered office at Avenida 5 de Outubro, nº125, 9º, 1050-052 Lisbon, whose contact details you can find further down in this Privacy Policy (hereinafter referred to as “PRIMEIT” or “we”).

### **B. How your personal data is collected and what type of data is collected**

Please note that you are not obliged to provide PRIMEIT with any personal data it may request (and you may therefore exercise your right to object at any time), but if you choose not to do so, we may not be able to provide you with our services, manage your application or answer any questions you may have.

PRIMEIT may collect your personal data in various ways, including when you subscribe to our newsletter, send us unsolicited applications, register on university job platforms, job fairs, employee or former employee referrals, workshops and partnerships with the intention of being contacted by PRIMEIT, you enter into a

contract with us (employment, service provision or other), fill out your customer form, or communicate with our customer support teams.

If you are a **candidate**, in order to identify and secure the best possible job and/or service opportunities tailored to you, we need to process certain information about you. We only request information that will be relevant to us, such as your name, age, contact details, education information, employment history, emergency contact, immigration status, financial information (where we need to conduct financial background checks), and social security number (and, of course, you may choose to share other relevant information with us). Where appropriate and in accordance with the law, we may also collect various information or data regarding any criminal convictions.

If you are a **client**, we need to collect and use information about you or people in your company as part of our service provision, in order to provide you with the most complete service possible and to ensure that our contractual relationship can proceed correctly. Therefore, in this context, we may request certain personal data, such as name, email, job title, and contact number of employees relevant to the provision of services.

If you are a **supplier**, we need a small amount of information relating to your personal data in order to ensure everything works correctly. We need contact details for certain people in your company so that we can communicate with you, as well as other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us). We may also hold information that someone in your company has chosen to share with us.

When we refer to suppliers, we intend to include any companies (including individual traders) and atypical service providers, such as independent contractors and freelancers, that provide services to PRIMEIT. In certain circumstances, PRIMEIT will subcontract the services it provides to clients to third-party suppliers who perform the services on PRIMEIT's behalf. In this context, suppliers who are individual traders, independent contractors, or employees of suppliers will be treated as applicants for data protection purposes. Please note that, in this context, PRIMEIT requires suppliers to report the relevant parts of this Privacy Policy (namely the sections addressed to applicants) to their employees.

Certain categories of personal data, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person,

data concerning health or data concerning a natural person's sex life or sexual orientation, are classified as "special categories of personal data" and benefit from additional protection under the General Data Protection Regulation ("GDPR"). PRIMEIT limits as much as possible the circumstances in which it collects and processes these special categories of data, only doing so when you have given your consent. To provide our users with faster and more personalized services, PRIMEIT may use a browser feature called "cookies," which will allow PRIMEIT to personalize its services and website according to your interests and needs, enabling you to streamline your future activities and your experience on the PRIMEIT website. In this way, data relating to browser parameters and settings, operating system, and geolocation may be collected. During part of your browsing on the PRIMEIT website, we may also use software tools to measure and collect session information, including page response times, download errors, duration of visits to certain pages, information regarding your interaction with them, and the methods used to leave them. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.

### **C. Purposes and basis for processing your personal data**

The purposes and grounds on which PRIMEIT processes your personal data depend on your status as a candidate, employee, or supplier. If you are a **candidate** (which includes suppliers who are individual traders, self-employed workers, or employees of suppliers), please note that your personal data will be collected and processed, in particular, for the following purposes:

- **Recruitment** – includes recruitment activities for service provision or "back office" functions, such as research and selection. In the case of service provision, current and potential PRIMEIT clients are approached in order to find an opportunity, placement at PRIMEIT, as well as related activities. This also includes the processing of data related to payroll processing and human resources management.
- **Contract execution** – includes activities such as entering into contracts with PRIMEIT and partners, as well as communication with third parties involved in the contracts (insurance companies, beneficiaries, intermediaries);
- **Development and improvement of services** – includes activities necessary for the development and improvement of services provided by PRIMEIT, analysis of activity and processing for potential future opportunities.



If you are a **supplier** or a **customer**, your personal data will be collected and processed, in particular, for the following purposes:

- **Contract execution** – includes all activities necessary for the execution of the service contract, especially those related to payment processing.
- **Communications** – includes the necessary contact information so that we can get in touch with you regarding our contracts.
- **Development and improvement of services** – includes activities necessary for the development and improvement of services provided to or by PRIMEIT, analysis of the activity, processing for statistical and scientific purposes, as well as to offer services to PRIMEIT or to obtain support and services from it;
- **Compliance with legal obligations;**
- In certain circumstances, to assist us in the declaration, exercise, or defense of a right.

PRIMEIT may use third-party service providers that perform functions on behalf of PRIMEIT, such as companies that host or operate the PRIMEIT website, process payments, analyze data, provide customer service, and sponsors or other third parties that collaborate directly with the activity carried out by PRIMEIT, so that your personal data may be processed by these third parties for the purposes described in this Privacy Policy. These third-party entities must process your personal data in accordance with this Privacy Policy and applicable law.

When we collect your personal data for the purposes described above or for other purposes, we will inform you in advance or at the time of collection, and we will seek your consent whenever necessary to legitimize the processing of your data. When you have given your consent for processing activities, you have the right to withdraw your consent at any time.

However, there may be some cases in which it is not your consent that legitimizes the processing of your personal data, but rather one of the following grounds:

- When processing is necessary to enter into a contract with you or to perform it;
- When processing is necessary for compliance with legal obligations to which PRIMEIT is subject;

- When processing is necessary to achieve a legitimate interest pursued by PRIMEIT, which does not compromise your interests, rights and fundamental freedoms that require the protection of personal data – this legal basis will only be used if there is no less intrusive way to process your personal data. We can assure you that if legitimate interest is used as a reason for processing your personal data, we will keep a record of this action and you will have the right to request this information;
- When processing is necessary for the establishment, exercise or defense of legal claims.

#### **D. The security of your personal data**

PRIMEIT undertakes all possible measures to ensure the confidentiality and security of your personal data, carrying out all efforts and security measures to protect your personal data from misuse, interference, loss, unauthorized access, modification or disclosure.

Our measures include implementing appropriate access controls to ensure that we encrypt, pseudonymize, and anonymize personal data whenever possible.

Access to your personal data is permitted only under the terms described above, always based on the genuine need for your knowledge, and subject to strict contractual confidentiality obligations when processed by third parties.

Although data transmission over the internet or website cannot guarantee complete security against intrusions, PRIMEIT and its service providers make every effort to implement and maintain physical, electronic, and procedural security measures designed to protect your personal data in accordance with applicable data protection requirements.

#### **E. Retention period for your personal data**

PRIMEIT will retain your data only for the period strictly necessary to fulfill the purpose for which it was collected. Specifically, in the case of personal data collected within the scope of recruitment processes, it will be kept for a period of 10 (ten) years after the last contact with the candidate. Personal data of our suppliers and clients will also be kept for a period of 10 (ten) years.

#### **F. With whom will your personal data be shared?**

PRIMEIT is part of a business group; therefore, your data may be disclosed to other

companies within the group in the context of providing shared services between group companies and for internal reporting purposes.

With the candidate's consent, personal data may be shared with companies belonging to the same corporate group in Portugal, for the purpose of presenting open job opportunities that match the candidate's skills profile. The list of companies within the same corporate group can be found on the website <https://weareprimegroup.com/brands/>.

On the other hand, your personal data may be shared with our clients within the scope of technology consulting services.

As mentioned in **Section C of this Privacy Policy**, your personal data may be shared with external service providers who perform functions on behalf of PRIMEIT. In this context, your personal data may be shared with companies currently subcontracted by PRIMEIT, as well as other service providers we may use in the future.

Under applicable law, PRIMEIT is required to disclose data to the Tax Authority, Social Security, the Authority for Working Conditions, and, following court orders, to the judicial authorities.

#### **G. International data transfers**

PRIMEIT shares personal data internally or with third parties for the purposes described in this Privacy Policy.

PRIMEIT will only send personal data collected within the European Economic Area (EEA) to foreign countries when necessary to follow your instructions, comply with a legal obligation, or work with agents and consultants who help us manage our business and services.

If you transfer personal data outside the EEA, PRIMEIT will ensure that it is protected in the same way as if it were being used within the EEA. To this end, we will use one of the following safeguards:

- Transfer to a non-EEA country whose privacy legislation ensures an adequate level of protection of personal data similar to that existing in the EEA;
- Implementation of a contract with the foreign entity that obligates it to protect personal data in accordance with the same standards used in the EEA; or

- Transfer of personal data to organizations with specific international data transfer agreements with the European Union (for example, the Privacy Shield, a framework that sets privacy standards for data shared between the United States and European countries).

## H. What are your rights?

As the owner of your personal data, you are guaranteed a set of rights regarding your personal data and how it is processed, namely:

- **Right to object** – that is, the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you, under the GDPR;
- **Right to information** – that is, the right to be provided with concise, transparent, understandable and easily accessible information, using clear and simple language, about how we use your personal data and about your rights;
- **Right of access** – that is, the right to access your personal data at any time;
- **Right to rectification** – that is, the right to rectify inaccurate personal data concerning you, or to complete it if it is incomplete;
- **Right to restriction** – under certain conditions, the data subject has the right to restrict the processing of their personal data;
- **Right to erasure** – under certain conditions, the data subject has the right to obtain from the data controller the erasure of their personal data without undue delay;
- **Right to data portability** – that is, the right to receive personal data concerning you that you have provided, in a structured, commonly used and machine-readable format, as well as the right to transmit this data to another controller, under certain conditions;
- **Right to lodge a complaint with the supervisory authority regarding how we process your personal data** – which will be the National Data Protection Commission, located at Rua de São Bento, no. 148 – 3rd floor, 1200-821 Lisbon, telephone +351 213928400, fax +351 213976832, and email geral@cnpd.pt;
- Right to withdraw your consent – in this case, withdrawing consent does not compromise the lawfulness of the processing carried out based on the consent previously given;

- The right not to be subject to decisions based solely on automated processes that produce legal or other significant effects.

The aforementioned rights may be exercised at any time by sending a communication to PRIMEIT – CONSULTING SA, using the contact information provided in this Privacy Policy.

Your requests will be handled with special care so that we can ensure the effectiveness of your rights.

You may be asked to prove your identity to ensure that personal data is only shared with its owner.

### **I. Contact details regarding PrimeIT**

If you have any questions about this Privacy Policy or about the processing and use we make of your personal data, or wish to file a complaint about a possible violation of privacy laws, please contact the data controller by email at **rgpd@primeit.pt** , or by mail at **Avenida 5 de Outubro, no 125 – 9.o andar, 1050-052 Lisboa** .

PRIMEIT will update its Privacy Policy whenever necessary to reflect feedback from data subjects, changes to our services, and to comply with all legally required requirements.

Should such changes imply a significant modification of this Privacy Policy, data subjects will be duly notified, and their consent will be requested whenever necessary.

Your satisfaction is very important to us. Therefore, please do not hesitate to contact us with any questions you may have, using the contact information provided.