

PRIVACY AND DATA PROTECTION POLICY

1 - Introduction

Central Lobão is committed to maximize levels of protection, treatment, safeguarding and secure transmission of confidential information of clients, employees and business partners, consistently complying with professional, ethical, legal, regulative and contractual requirements.

The company intends, with this information security and privacy guide, to explain how it uses and handles information and personal data which is collected from our employees, partners and customers when they interact with the company.

The topics broached in this document systematize the control and management of security and privacy of Central Lobão's information, and may be used separately, to instruct, communicate or regulate specific activities, such as cookies, management of our websites, clean desk policy, marketing, among others.

Topics:

- • Company Privacy Policy
- • Declaration of Legitimate Interest
- • What data we collect?
- • How we collect this data?
- • How will we use this data?
- • How do we store this data?
- • Marketing
- • What are your data protection rights?
- • Cookies Policy
- • How do we use cookies?
- • What kind of cookies we use?
- • How to manage your cookies
- • Password policy and access control
- • Cryptography Policy
- • Corporate Mobile Device Policy
- • Clean desk policy
- • Privacy policies of other websites
- • Changes in our privacy policy
- • How to get in touch with us
- • How to contact the appropriate authorities
- • Telework policy

2 - Policies

2.1 - Data protection and Privacy Policy and Scope of the Information Security Management System

The scope of Central Lobão's ISMS (Information Security Management System) corresponds to its focus of activity: "Sales and Servicing of Hand and Power Tools for Construction and Agriculture. Sales of Electrical Material, Lighting and Personal Protective Equipment".

Central Lobão is committed on protecting and handling information from the relevant interested parties. Considering the importance of information nowadays, with its easy and instantaneous dissemination, it is very important for Central Lobão to safeguard this valuable intangible asset. Given this reality, Central Lobão is committed on implementing an information security and privacy policy in an ethical, conscious, and responsible manner, in accordance with the regulations in force, based on the following pillars:

- • Safeguarding information and knowledge crucial to the continuity and success of your business and that of your partners;
- • That all employees have access to the information strictly necessary for the full performance of their duties;
- • Be responsible for the data stored, transmitted and processed, as well as the information resulting therefrom;
- • Continuous improvement of the information security management system;
- • Maintenance and treatment of confidentiality and integrity of information;
- • Promotion of awareness-raising actions on information security.

2.2 - Declaration of Legitimate Interest

The company hereby declares that for the purposes of using the personal data of its interested parties, in compliance with the Data Protection Act, uses this personal data in a legitimate way for the execution of its business scope in the following processes and for the following purposes:

1. Human Resources – Record of recruitment activities, admission, dismissal, training of employees, payroll calculation, granting of benefits, holidays, overtime, overtime bank and contract termination;
2. Quality Management and Information Security Systems – Internal auditing, Company management activities, access control, training and supplier evaluations, conducting customer satisfaction surveys, as well as controlling, managing and monitoring the continuous improvement of the Company's management systems;
3. Commercial - Collecting customer data for issuing contracts, orders, product shipment and invoicing;

4. Logistics / Expedition - For checking and validating expedition actions, access to name, address, order data and legal documentation is necessary for the effective delivery of the product to the customer;
5. Marketing – Recording customer and employee data to create retention methods and use personal data for campaigns;
6. Purchase – To perform recording, qualification, due diligence, evaluation and payments to suppliers, individuals and those providing services and digital products;
7. Invoicing/Accounts Payable and Receivable - To perform registration, collection, payments and financial consolidations with interested parties;
8. Customer Service – Collection of personal data to assist customers regarding orders, invoicing and products;
9. Service center - Collecting personal data for quotation, clarifying doubts, repairing and delivering the equipment to the customer.

2.3 - What data do we collect?

The company collects the following data:

- • Full name;
- • Data and photo of ID card, residence card, passport and driving licence;
- • Mobile numbers and e-mail addresses;
- • Proof of address;
- • Marital status and household information;
- • Curriculum and qualification certificate;
- • Banking information;
- • Job.

2.4 - How do we collect your data?

Individuals directly provide Central Lobão with most of the data that is collected.

Data is processed when:

- • You fill in the form on the website about our sales points or look for information about being our customer;
- • You voluntarily fill in a customer survey or provide feedback on any of our media;
- • You apply spontaneously for the Central Lobão;
- • Usam ou visualizem o nosso site através dos cookies do seu navegador;
- • During the internal process of recruiting and hiring employees and / or suppliers;
- • In the relationship with our suppliers and partners there is the possibility of collecting corporate information and personal data, all controlled and managed by the declaration of legitimate interest;
- The company may also receive personal data indirectly from the following sources:
 - • Social media;

- • IEFP (Institute for Employment and Vocational Training).

2.5 - How will we use the data?

Central Lobão collects your data so that we can:

- • Process orders and managing your account.
- • Send e-mails with special offers on products, campaigns and/or services;
- • Carrying out customer and supplier satisfaction surveys;
- • Registration of employees and suppliers in the system.

If agreed, Central Lobão will share personal data with its partner companies so that they can offer their products and services, in particular:

- • Insurance Companies;
- • Occupational healthcare;
- • Agreements with companies;

2.6 - How do we store the data?

Central Lobão stores your data securely in a cloud system with offsite backup and on paper.

2.7 - Marketing

Central Lobão sends information about activities, processes, products and services that it believes interested parties might like. We also use employees' personal data, always with consent, for specific marketing campaigns.

If you have agreed to receive marketing campaigns, it is always possible to unsubscribe at any time, for example via the unsubscribe from marketing email address.

The interested party has the right, at any time, to prevent Central Lobão from contacting them for marketing purposes or providing the data to other members of the Corporate Group.

2.8 - What are your data protection rights?

Central Lobão aims to ensure that the client/supplier/employee is aware of all their data protection rights. All users are granted the following rights:

Right to access - Users have the right to ask Central Lobão for copies of your personal data;

Right to rectification- Users have the right to request that Central Lobão correct and complete any information that you consider inaccurate, incorrect or incomplete;

Right to erasure - Users have the right to request that Central Lobão delete their

personal data, under certain conditions;

Right to restrict processing - Users have the right to request that Central Lobão restricts the processing of their personal data, under certain conditions;

Right to object to processing - Users have the right to object to the processing of their personal data by Central Lobão, under certain conditions;

Right to data portability - Users have the right to request that Central Lobão transfers the data collected to another organization, or directly to the user, under certain conditions.

If a request is made, Central Lobão has one month to respond to it. If you wish to exercise any of these rights, please contact us through the following channels:

E-mail: helpdesk@centrallobao.pt

Phone number: +351 256 331 080

2.9 - Cookies policy

What are cookies?

"Cookies" are data packets that a website sends to your computer while you are visiting that website. These data files include information that enables them to memorize important data that will make your browsing more efficient and useful. This website uses cookies for various purposes, namely to obtain data of a non-personal nature from online visitors, and which are related to a better experience of use and navigation of the website.

How are cookies used?

Visitors to this website use different computers and different web browsers. To make your visits as easy as possible, a record is automatically kept of the type of browser (e.g. Internet Explorer, Google Chrome) and operating system (e.g. Windows, Macintosh) used and the domain name of your internet service provider.

What are cookies used for?

Cookies help to determine the usefulness, interest and number of visits to your websites, allowing a faster and more efficient navigation, eliminating the necessity to repeatedly enter the same information.

What kind of cookies do we use?

Persistent cookies: are cookies that are stored in the browser of your electronic device (PC, smartphone and tablet) and are used whenever you visit one of our sites more than once. They are generally used to direct navigation to the user's interests, allowing us to provide a more personalized service.

Session cookies: are temporary cookies that remain in the cookie file of your browser until you leave the site. The information gathered by these cookies serves

to analyze web traffic patterns, allowing you to identify problems and provide a better browsing experience.

For what purposes do we use cookies?

- • Strictly necessary cookies: Allow you to browse the site and use its apps, as well as to access secure areas of the site. Without these cookies, the requested services cannot be provided
- Analytical Cookies: are used anonymously for the purpose of creating and analyzing statistics in order to improve the performance of the site.
- • Functionality Cookies: GStore your preferences, so you don't have to reconfigure the site every time you visit it.;
- Third party cookies: They measure the success of applications and the effectiveness of third-party advertising. They can also be used to customize a widget with user data;
- • Advertising Cookies: They target advertising according to the interests of each user to guide advertising campaigns, taking into account the user's interest, and also limit the number of times they see the ad, helping to assess the effectiveness of the advertising and the success of the ad and the structure of the website;

- • How can you manage your cookies?
 - • All browsers allow you to accept, refuse or delete cookies, in particular by selecting the appropriate settings in your browser. You can configure cookies in the "options" or "preferences" menu of your browser. However, please note that by disabling cookies you may prevent some web services from working properly, partially or totally affecting navigation on the website.

2.10 - Privacy policies of other websites

The Central Lobão website may contain links to other websites run by operators that are not associated with us. By clicking on the link, we no longer have any influence over the collection, storage or processing of any personal data transmitted (such as the IP address or URL of the page containing the link), bearing in mind that the behaviour of third parties is, by nature, beyond our control. Therefore, Central Lobão is not responsible for the processing of personal data by third parties.

Changes in our privacy and data protection policy

Central Lobão, S.A. reserves the right to change the terms of this policy and therefore requests that you revisit this document to keep you updated. If there is a need for Central Lobão, S.A. to use your data for purposes other than those set out

in this Privacy Policy we will ask for your consent. The last update of this policy was made on 3 August 2021.

How to get in touch with us

All the data we collect or that is provided to us is processed and stored by Central Lobão, S.A., in accordance with the Data Protection Regulation, in force from 25th May 2018. Central Lobão, S.A. as the responsible for the processing of your data may be contacted through the following channels:

-João Silva and Graça Oliveira who are responsible for information privacy and data protection at Central Lobão;

- • Through a contact form;
- • Via mobile phone: +351 256 331 080 (Monday to Friday, from 8.30am to 12.30pm and from 2pm to 6pm);
- • Via email: helpdesk@centrallobao.pt;
- • Through the following address: Rua da Gândara, 664, 4520-606 São João de Ver, Portugal.

How to contact the competent Data Protection Authority

If you wish to report any incidents or if you feel that Central Lobão has not properly handled your case, please contact the CNPD - Portuguese Data Protection Authority through the following channels:

E-mail address: geral@cnpd.pt
Mobile phone: +351 213 928 400
Morada: Av. D. Carlos I, 134, 1º
1200-651 Lisboa