Privacy statement

Protecting your privacy is extremely important to **PromirisTP VastGoed**.

This data protection statement describes how **PromirisTP VastGoed** stores, uses and protects the various data and guarantees that this data is not used for profit. It also informs you of your rights regarding this data in accordance with European Regulation 2016/679 (GDPR)

In this document, the Company PromirisTP VastGoed is referred to as "PTP"

Scope of the agreement on the use of personal data

The customer consents to the collection and use of personal data in the manner set out in this article by giving their agreement when entering or communicating personal data or when concluding a contract.

We collect personal data (surname, first name, address, telephone number, email address).

The customer agrees explicitly and freely to the use of their data for advertising, commercial or marketing purposes and agrees to receive promotional information and material by email, telephone or post. This authorisation can be withdrawn at any time upon request and the commercial opt-ins will be automatically cancelled after 30 months without activity.

The customer agrees that their data may be passed on to our partners, employees and subcontractors for the purpose of performing the services entrusted to us.

The customer is advised that we are not responsible for any use of the transmitted data by third parties. We will ensure that third parties comply with the applicable regulations governing the processing of personal data.

For further information, please also refer to the privacy policies of our partners:

Thomas & Piron: https://www.thomas-piron.pt/politique-de-confidentialite

PROMIRIS: <u>https://promiris.com/fr/protection-vie-privee/</u>

Data collection

Personal data includes your name, address, date of birth, email address, telephone number, metadata and any other private information you may have provided to us for the management of your dossier or when you request information from us.

PTP collects your personal data when:

- you visit our website (cookie policy)
- you request information by phone, by email, or by a contact form on our website
- you request a press contact using the contact form on our website
- you sign a contract
- you subscribe to our Newsletter

Your data is not entered into our general databases but into a separate database processed by personnel dedicated solely to the project.

Reasons for data entry

Most of the services offered by PTP require the registration of your data so that we can:

- follow up on your dossier both for the execution of the contract and for the application of conventional and legal guarantees thereafter
- suggest products that correspond to your expectations within the framework of our commercial prospecting activities
- respond to your requests for information
- carry out satisfaction surveys
- register external visitors who access our facilities
- send you our newsletter
- send you personalised magazines
- respond to your requests for information for publication in a media outlet

The personal data you have provided will only be used for these specified purposes.

The nature of the information collected may vary according to the situation and depends specifically on the type of contract you have signed.

We would like to draw your attention to this point when you sign.

You may be asked questions about your first name, surname, address, age, year of birth, gender, email address or other information relevant to your dossier.

PTP limits the collection and processing of personal data to that which is absolutely necessary; if any data is communicated to third parties, it will always be for the reasons given above.

We guarantee that your data will not be communicated to third parties for a fee.

Legal basis for the processing of personal data

We collect and use your personal data only <u>if at least one</u> of the following conditions applies:

- we have your consent: by submitting your personal data, you give your consent to its storage and processing in accordance with this statement;
- it is necessary for performing a contract with you or taking steps at your request before entering into a contract, during the performance of the contract or afterwards for the purposes of the guarantees attached to it;
- it is necessary for complying with a legal obligation;
- it is in our or a third party's legitimate interests, and these are not overridden by your interests or rights.

Duration

Your IP address and the name of your Internet service provider, which we store for security purposes only, will be deleted after seven days. Otherwise, we delete your personal data as soon as the purpose for which we collected and processed the data ceases to apply. After this point, data is only stored if required by the laws, regulations and other legal provisions of the European Union or a Member State of the European Union to which we are subject.

In the context of commercial processing, the collected data will be used for a period of 30 months from your last contact with a TP Group company. The data will be deleted after that time.

Use, sharing and transmission to third parties

PTP registers and processes your personal data in a database shared by all partner companies, according to their missions.

PTP undertakes not to pass on your personal data to a third party outside our partner companies, other than to our carefully selected sub-contractors, business partners or distribution partners solely to the extent necessary for the performance of their work or services, in relation to your contract, for our marketing activities or to measure the quality of our service as set out under the heading "Reasons for data collection".

PTP requires any third party who has access to your personal data for the above-mentioned purposes to ensure that this data is protected to the same standards as PTP. Your personal data will not be used for any other purpose than that expressly prescribed by PTP and in accordance with the legal bases set out above.

We may also need to share personal data in these exceptional cases, such as in the event that it is necessary to establish, exercise or defend our rights, as justified by our legitimate interest.

When we share personal data with third parties, we ask them to comply with the regulations, keep the data secure and not use it for their own commercial purposes.

Social network features

Our websites may contain features from social networks such as Facebook, Twitter, Google+ and Pinterest, which have their own privacy policies.

Please read their terms and conditions and privacy notices carefully before submitting your personal data to these websites, as we do not accept any responsibility for these features.

<u>Cookies</u>

We record your behavioural data when you visit our website. This is data resulting from the use of cookies and logging.

The use of cookies

Cookies are information files that are automatically recorded on your computer's hard drive when you visit our website, and include a unique identification number. Their purpose is to simplify access to and navigation on the website. They may also be used to tailor commercial offers from PTP but currently they do not allow us to provide you with this targeted commercial advertising.

Types of cookies

Our website currently only uses session cookies. This means that these cookies will disappear the next time you visit our website.

Purposes of using cookies

- Necessary for the proper functioning of the website

Necessary cookies help to make our website usable by enabling basic functions such as page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

- Managing preferences

The cookies used record your browsing preferences and allow us to improve your user experience of our website (the choice of language for example).

- Statistical analysis of traffic (analytical cookies)

Our website uses cookies generated by the analysis service offered by Google: Google Analytics. To guarantee the highest level of protection, **PTP has decided to make the placement of these cookies subject to your consent.**

The information transmitted to Google via this service is purely statistical and enables Google to provide us with reports on user behaviour and offer us services to optimise the operation

of the website. So, if this level is not chosen, we will not be able to receive information that will improve the usability and quality of experience of our website.

- Placed by third parties

Some cookies provided by third-party partners are necessary to access certain content. To guarantee the highest level of protection, **PTP has decided to make the placement of these cookies subject to your consent.** Therefore, if this level is not chosen, content such as videos, maps, social media or sounds may be blocked. You can view the list of third-party cookies by clicking on the "More info about cookies" link in the bottom right of this window.

Examples of permitted features

- to remember login information and provide a secure login
- to remember the items in your basket
- to allow you to play video or audio content hosted on third-party websites
- to allow third parties to provide tools for sharing content on social networks

Cookie management

Your browser allows you to accept or refuse the use of cookies and notifies you whenever an attempt is made to install a cookie. You are free to refuse these cookies, although this can hinder optimum browsing and the functionality of the website's services.

Please consult the help function on your browser for more information.

Here is the data that can be collected via cookies:

- the IP address assigned to you at the time of connection
- the date and time you accessed the website
- the pages you consulted while connected to your browser
- the browser that may have been used
- the platform and/or operating system installed on your computer
- the search engine and keywords used to find the service website
- downloaded files
- the choice of language
- the website via which you arrived

This data will only be used to find out the number of users of the different sections of the services and to improve the content of the services.

<u>Security</u>

PTP takes all necessary measures to guarantee the accuracy, completeness and suitability for the stated purpose of the use of personal data entered.

PTP applies the appropriate technical and organisational security measures to ensure the protection of your data against loss, misuse, manipulation or unauthorised access.

At the same time, we are taking steps to update our security systems to address new and known risks. However, we stress that it is not possible to guarantee the absolute security of personal data. Please note that data transmission over the Internet, in particular the sending of emails, is never completely secure or error-free. We therefore recommend that you protect your computer and your access data from misuse.

Right of Access

You have the right to ask at any time what data has been collected, how long it will be kept and for what purpose.

Right to rectification

Please always update the data you have provided to us, for example by informing us of your new address, email address, or any change of name. This will allow us to provide you with the information that best meets your needs.

You have the right to check and correct all the data you have sent us. But this right is subject to certain restrictions. To ensure the protection of your personal data against unauthorised access or modification, we check the identity of the person who initiates a request for access to or rectification of your personal data.

Right to revocation

It is possible to revoke consent to the use of the data provided at any time, other than what is strictly necessary for the processing of your dossier during the execution of the contract and its guarantees, for our legitimate interest, for compliance with a legal obligation and for the defence of our rights.

If PTP intends to use personal data for a purpose other than that previously specified, you will be informed of this intention and given the opportunity to refuse this change.

Changes to our privacy statement

We may change our statement at any time. Therefore, please check our website(s) regularly for any updates.

<u>Contact</u>

You therefore have the option to correct, modify or delete at any time the personal data that you have transmitted to PTP and that is not necessary for the processing of your dossier, as well as the option to be notified of your personal data stored in our servers by contacting us by post or by sending us an email at the following address:

PROMIRISTP VASTGOED S.A.

Data Controller Email: privacy@thomas-piron.pt

<u>Complaints</u>

Please contact the above-mentioned Data Controller if you have any difficulties.

However, you are entitled to lodge a complaint with the Data Protection Authority if, after making contact, you consider that we have not processed your personal data in accordance with the applicable regulations:

National Data Protection Commission

Av. D. Carlos I, 134, 1º 1200-651 Lisbon https://www.cnpd.pt/ geral@cnpd.pt