

PRIVACY AND DATA PROTECTION POLICY

3/03/2025

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1 INTRODUCTION

1.1 Purpose of the document

The purpose of this document is to establish the privacy policy of Arrow4D - Consultores de Engenharia e Geofísica, Lda's privacy policy, which aims to fulfil the information requirements to be provided to personal data subjects, as set out in articles 13 and 14 of the General Data Protection Regulation (GDPR).

1.2 Scope of Application

This policy applies to Arrow4D - Consultores de Engenharia e Geofísica, Lda (Arrow4D), in its capacity as Data Controller, and must adopt appropriate measures to provide data subjects with information regarding processing, in a concise, transparent, intelligible and easily accessible manner, using clear and simple language.

1.3 Validity

Any revision made to this document after the date of the last published version will come into force immediately after its publication, cancelling all effects of previous versions.

If, for technical or functional reasons, it is not possible to apply the specifications described in this document, this must be reported to those responsible and the necessary changes made.

1.4 Review and evaluation

This document will be evaluated and revised on an annual basis or whenever necessary. The Arrow4D Working Group is responsible for the review;

1.5 Reference documents

For the realisation of this document, the following sources are taken as references:

- ISO/IEC 27001:2013 - Information Security Management System;
- ISO/IEC 27002:2013 - Code of Good Practice for Information Security Management;

- Regulation (EU) No 679/2016 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation or GDPR);
- Law 58/2019, of 8 August, which ensures the implementation, in the national legal order, of the General Data Protection Regulation.
- Other applicable legislation

2 PRIVACY POLICY

The protection and privacy of personal data is a fundamental commitment of Arrow4D to its data subjects.

With the entry into force of the GDPR, Arrow4D remains committed to complying with personal data protection legislation and to the privacy and security of information in order to protect data subjects.

This Privacy and Data Protection Policy is intended to make known the general rules for processing of personal data in a transparent manner, which are collected and processed in strict respect and compliance with the provisions of personal data protection legislation.

Any hyperlinks to websites external to Arrow4D websites or affiliated brands are not covered by this Privacy and Data Protection Policy.

2.1 Data Controller

The Data Controller is the company Arrow4D - Consultores de Engenharia e Geophysics, Lda.

Head office: NERE, PITE, Rua circular norte, sn, escritório 22, 7005-841 Évora

Telephone: (+351) 966 167 709

General email: geral@arrow4d.p

2.2 Collection of personal data

In order to provide services, Arrow4D collects personal information through various channels:

- Telephone;
- Websites;
- Information Systems;
- Postal or electronic mail;
- Contact forms

2.3 What personal data is processed

Personal data is processed by computer and in an automated manner, in accordance with the principle of minimising personal data, i.e. only the appropriate, relevant and limited to what is necessary for the provision of Arrow4D services and its brands are collected.

The categories of personal data processed are as follows:

- Identification data: name, date of birth, national identity card details, nationality;
- Contact details: address, telephone number and email address;
- Professional data: job title, functions and company;
- Academic and professional data: qualifications, certifications and CVs;
- Billing data: tax identification number and billing address;
- Image and sound data: context of events and activities;
- Digital data: unique identification of the IP (Internet Protocol) device, including date and time of access.

2.4 Purposes for processing personal data

Personal data is only processed in cases where there are lawful grounds. Arrow4D presents the possible legal grounds for processing personal data:

- Consent: it is ensured in a free, specific, informed and unambiguous manner that personal data are processed subject to the consent of the data subject for one or more specific purposes;
- Performance of a contract: processing necessary for the performance of a contract concluded for the provision of services to which the data subject is a party or for pre-contractual steps at the request of the data subject;
- Compliance with a legal obligation: when processing is necessary to comply with legal obligations to which Arrow4D is subject, personal data are processed and may be transmitted to other entities;
- Legitimate interest: when the processing is necessary for the management of suggestions and/or complaints and for the adequacy of the services to be provided within the scope of Arrow4D's competences.

If there is an intention to further process personal data for purposes other than those defined, Arrow4D provides the necessary information, as well as any other information that, in the context, is relevant and appropriate, thus cultivating transparent and equitable processing.

2.5 Personal data retention periods

The retention periods for the personal data processed are the result of the legal and regulatory provisions that oblige them to be kept for a minimum period of time, respecting the legally prescribed periods.

If the processing is based on your consent, we will retain the data until consent is withdrawn or if the purpose of the processing ceases.

2.6 Rights of personal data subjects

Arrow4D guarantees respect for the holders of personal data, under the terms of the law, in the pursuit of its duties, and whenever called upon guarantees:

- Right of access: to obtain confirmation as to whether or not the personal data concerned is being processed and, if so, the right to access personal data and information regarding the data being processed and the respective purposes;
- Right of rectification: to obtain the rectification of personal data concerning him or her, being able to rectify incomplete or inaccurate data at any time.
- Right to erasure: to obtain from the data controller the erasure of your personal data, when a retention period has been reached or the data processing is no longer lawful;
Right to restriction of processing: obtain the right to restriction of processing of personal data, allowing the suspension of processing;
- Right to portability: obtain the right to portability of personal data in a structured and format to transmit that data to another organisation;
- Right to object: to obtain the right to object to processing on grounds relating to a valid particular situation that prevails over the rights, freedoms and guarantees;
- Right to object to automated decisions: obtain the right not to be subject to any decision taken solely on the basis of automated processing, including profiling;
- Right to withdraw consent: obtain the right to revoke consent to specific processing at any time, for a specific reason.

If the data subject requests any type of information from Arrow4D, this will be provided that their identity is duly verified.

Responses are made in writing, using clear and simple language, in a concise, transparent, intelligible and easily accessible manner, within a period of one month, which may be extended to two months in the event of greater complexity or depending on the number of requests received.

2.7 Complaints

The National Data Protection Commission (CNPD) is the independent national administrative authority with powers of control over the processing of personal data, with the power to monitor compliance with the GDPR and other legislation in force, in order to defend the rights, freedoms and guarantees of natural persons.

If any data subject considers that the processing of personal data does not comply with the legislation in force, they have the right to lodge a complaint with the supervisory authority under the terms of the law:

Head office: Av. D. Carlos I, nº 134 - 1º, 1200-651 Lisboa

Telephone: (+351) 213 928 400

General email: geral@cnpd.pt

2.8 Security measures

Arrow4D undertakes to guarantee the security of the personal data made available to it by implementing appropriate technical and organisational measures to protect it, against destruction, loss, alteration, dissemination, unauthorised access or any other form of accidental or unlawful processing, in accordance with applicable legislation.

Recognising that technology is constantly evolving, we regularly review and improve the measures in place to ensure that appropriate security procedures are in place to protect data subjects' information from unauthorised access and disclosure.

Because data security is not just a matter of technology, we invest heavily and regularly in training our employees to ensure that they have the necessary legal and technical knowledge when handling your personal information, following known and recognised best practices and complying without exception with defined and implemented internal procedures.

2.9 Transfers of personal data

Personal data will be processed within the European Economic Area and will only be transferred or made available to third parties in the cases and under the conditions laid down by law.

In the event that personal data is transferred to entities located in countries outside the European Economic Area, the applicable legal obligations will be strictly complied with.

2.10 Subcontractors

Within the scope of its activities, Arrow4D uses other duly certified and accredited entities. To this end, it carries out a prior assessment to determine compliance with the GDPR and to ensure that the entities are reputable and offer security guarantees to process the personal data of the data subjects to which they have access for this purpose, in accordance with the applicable legislation.

2.11 Security breaches or loss of personal data

Any breach of security or loss of personal data will be reported immediately to the Data Protection Officer for recording and evaluation of the measures to be taken.

In the event of a breach of personal data, Arrow4D undertakes to notify the National Data Protection Commission within 72 hours of the occurrence of the event that results in a high risk to the rights and freedoms of natural persons.

2.12 Cookies

Cookies are small text files that are transferred to the computer's hard drive via the web browser in order to recognise the browser and provide a better user experience on the Website.

The cookies used on the Website are essential and ensure a smooth, efficient and functional browsing experience. If cookies are disabled, website browsing may not be optimised and some features may not function properly.

For more information about cookies and how to use them, see the following link: www.allaboutcookies.org

If Arrow4D uses other cookies to provide additional services, the user will be duly informed.

2.13 Changes to the Privacy Policy

Taking into account ongoing technological and legal developments, the Privacy and Data Protection Policy may be revised at any time to make adjustments or changes in order to adapt it to changes in legislation, and these changes will be duly published with the new wording in the appropriate places.

2.14 Signatures

Évora, 3rd March 2025,

The Management,