

# Privacy Policy

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## Approval History

Version	Revised by	Revision date	Approved by	Approval date
0.1	Hugo Pereira	18/05/2018	-	-
1.0	Hugo Pereira		Executive Committee	

## Revision History

Version	Updated by	Date	Update description
0.1	Hugo Pereira	18/05/2018	Initial version of the document
1.0	Hugo Pereira	23/05/2018	Insertion of the several stakeholders comments and submission to the Executive Committee approval.

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## Commitment

AEnergia S.A. (Aenergy) is committed to respect the privacy and to protect and secure personal data. As such, Employees, Partners, Suppliers and Customers (Data Subjects) are informed of how Aenergy collects, processes and protects personal data.

Data Subjects should read this Privacy Policy carefully and decide freely and voluntarily if they wish to provide their personal data to Aenergy.

Thus, Data Subjects guarantee that the data provided is true, accurate, complete and up-to-date and will be held responsible for any direct or indirect damage or loss that may arise as a result of breach of such obligation.

If the communicated data belongs to third parties, Data Subjects must guarantee that they have informed these third parties about the conditions set forth in this Policy and that they have obtained their authorization to provide such data to Aenergy for the indicated purposes.

## Scope

The Privacy Policy is applicable to all personal data collected by Aenergy. The companies indicated below are jointly responsible for processing the above data:

- AEnergia, S.A.
- AEnergia, S.A. – Sucursal de Portugal.

The abovementioned companies jointly determined the purposes and means for processing the Data Subjects personal data and entered into an agreement regulating the functions and responsibilities required to comply with the applicable data protection legislation.

## Representative

Aenergy designates as its representative in the European Union, under the terms of the GDPR, Aenergy, SA – Sucursal de Portugal, for the purposes of compliance with Article 27 of the Regulation, being the same entity mandated to be contacted in addition to or in substitution of the responsible for the treatment, in accordance with the previous chapter, by control authorities and Data Subjects for all matters relating to the treatment.

## Contact

You may contact Aenergy and its representative on any matter related to this Privacy Policy, through the following contacts:

- E-mail address: [Privacy@aenergy.com](mailto:Privacy@aenergy.com).
1. telephone number of the Compliance Department Director (António Ferreira) who assumes the Data Protection Officer responsibilities: (+351) 211 305 071.

## Purposes of the Treatment and Legal Basis

Data processed by Aenergy are collected in the context of contracting, vehicle provision, service delivery and the provision of services and goods.

These data include identification data, numbers and validity of identification documents, quality and capacity in which they act, signatures, names, e-mail addresses, telephone numbers, addresses and functions.

Within the scope of the business and contractual relations established, Aenergy may carry out different actions involving the processing of personal data:

- Administrative, commercial, tax and accounting or billing management.
- Risk assessment.
- Complaints/suggestions management.
- Submission of relevant information required from the counterparty in a business relationship.
- Projection of new supplies or services related with the previous ones.
- Statistical studies to improve supplies or the performed services.

In addition to a legitimate interest, Aenergy has the right to:

- Send information about modifications to contracts, products or services contracted with the counterparty in a business relationship.

By accepting the business/contractual relationship, Data Subjects consent to the processing of their data for the purposes described, without prejudice to their rights. The processing of this data will always be done with the prior consent of the Data Subject, except in cases where there is a legal obligation for Aenergy.

## Policy Revision

The Privacy Policy is reviewed and revised whenever justified, for example, due to changes in the Organization's context, new legal or compliance requirements, changes in the physical and technological environment, or the need to align with Aenergy's strategy.

## Personal Data Communication

Aenergy may communicate the Data Subjects personal data to third parties, and they commit to treat such personal data solely and exclusively for the agreed purposes, namely the conclusion, execution, maintenance and management of contracts and contractual relations between the parties and/or the provision of services, supplies of products and/or payments and collections.

In addition, Aenergy may communicate the Data Subjects personal data to any authorities or regulators that, in the exercise of the legally assigned functions, request them, assuming the commitment to immediately notify the Data Subjects in this eventuality.

## Subcontractors

The processing of Data Subjects data may be performed by a suitable service provider contracted by Aenergy, or by the companies indicated in the "Scope" chapter of this Policy. The said service provider will only deal with the data for the purposes established by this group of companies and in compliance with the instructions issued by them, strictly complying with the legal rules on personal data protection, information security and other applicable standards.

## International Data Transfers

Due to the typology of projects carried out and the internationalization of Aenergy, Aenergy will handle the data of the Data Subjects not only in the European Economic Area but may carry out international transfer of data in the context of the procedures for processing visas and tender applications.

Nevertheless, Aenergy maintains in force Data Transfer Agreements based on Standard Contractual Clauses and contracted companies to house Aenergy's information (Microsoft and Claranet) present adequate guarantees of data protection, through adherence to the Privacy Shield Agreement.

## Retention Timeframes

Aenergy will retain the Data Subjects personal data only during the time necessary for the purposes for which they were collected, namely, as long as a service contract or other services are maintained between the Data Subject and Aenergy, or other timeframes legally required.

In case of a legitimate authority order or if pending legal or administrative proceedings, the data retention periods will be extended as required.

## Data Subjects Rights

Data Subjects may, at any time, exercise their rights of access, rectification, erasure, objection, limitation and portability of their data, through the e-mail address [Privacy@aenergy.com](mailto:Privacy@aenergy.com) or using the telephone number of the Compliance Department Director of (António Ferreira), who assumes the responsibilities of Data Protection Officer (+351) 211 305 071.

The Data Subject is advised that if he considers that Aenergy has violated or may have violated its rights under applicable data protection legislation, it may submit a complaint to the Comissão Nacional de Protecção de Dados (the Portuguese Data Protection Authority).

## Revocation of Consent

The Data Subject's acceptance that their data may be processed or assigned shall always be revocable, without retroactive effects.

To revoke such consent, Data Subjects may contact Aenergy through the e-mail [Privacy@anergy.com](mailto:Privacy@anergy.com) or through the telephone number of the Compliance Department Director (António Ferreira) who assumes the responsibilities of Data Protection Officer (+351) 211 305 071.

## Measures for Protection of Personal Data

Aenergy applies a number of appropriate technical and organizational measures to protect the personal data of Data Subjects taking into account the current state of the technology, the nature of the data stored and the risks to which it is exposed, in order to guarantee its security and to avoid alteration, loss, processing and unauthorized access, whether arising from human action or derived from natural, physical and electronic actions.

These measures include the use of secure servers, encryption of application data with confidential information and communications.