

# **Privacy Policy**

### Scope

This privacy policy aims to make known how Sociedade de Transportes Colectivos do Porto, E.I.M., S.A. (hereinafter referred to as STCP, E.I.M., S.A.) headquartered at Avenida Fernão de Magalhães, 1862.º, 13.º piso, 4350-158 Porto, with a single legal person number and registration number 500 246 467, with share capital of 90,000 .000 € (ninety million euros), processes your personal data.

Your privacy and the protection of your personal data are a priority for STCP, E.I.M., S.A. and, therefore, we recommend the reading of this document. The provision of your personal data implies knowledge and acceptance of the terms and conditions of this Privacy and Data Protection Policy.

### Commitment

STCP, E.I.M., S.A. ensures adequate personal data management and in compliance with applicable legislation. Personal data are subject to lawful, fair and transparent processing, being collected for specific, explicit and legitimate purposes, guaranteeing STCP, E.I.M., S.A. that such personal data are adequate, relevant and not excessive in relation to the purposes for which they are collected.

The data collected is processed by computer, being stored in specific databases, created and managed for this purpose.

The person responsible for the processing of personal data, as well as the persons who, in the exercise of their functions, are aware of the personal data being processed, are subject to professional secrecy and a duty of confidentiality, even after the end of their functions.

## Responsible for the data treatment

STCP, E.I.M., S.A. is responsible for the processing of your personal data, insofar as it determines the purposes and means of processing.

It is up to the data controller to apply the technical and organizational measures that are appropriate to ensure that the processing of personal data is carried out in compliance with the rules resulting from the General Regulation on Data Protection and the respective implementing law.

#### **Data Protection Officer**

STCP, E.I.M., S.A. appointed a Data Protection Officer who can be contacted via the email address <a href="mailto:epd@stcp.pt">epd@stcp.pt</a> or by letter sent to Avenida Fernão de Magalhães, 1862, 13.º Piso, 4350-158 Porto.

#### Personal data collected

STCP, E.I.M., S.A. collects and processes personal data to carry out its duties, namely for the purposes of identification, contact, billing, recruitment, management of administrative offenses and complaints, as well as those that may prove to be strictly necessary for the fulfillment of its legal and contractual obligations.

# Categories of personal data processed

The data collected may be the following:

- a) Identification data, such as name, civil identification number, NIF, date of birth;
- b) Contacts, such as address, email address, telephone or mobile phone number;
- c) Professional data, academic qualifications, certifications, curriculum;
- d) Payment data, in the case of requesting a service or within the scope of the execution of a contract, data will be collected to proceed with the respective processing;
  - e) Video, in the case of visiting the facilities of STCP, E.I.M., S.A or traveling in one of its buses.

# Grounds and purpose of the treatment

STCP, E.I.M., S.A. collects and processes personal data for the purposes of fulfilling its obligations.

# Sharing and disclosure of data to third parties

Within the scope of its activity, STCP, E.I.M., S.A. may resort to subcontractors who process personal data on its behalf, which will imply access, by these entities, to such data. If this happens, STCP, E.I.M., S.A. will take appropriate measures, contractually provided for, so that third parties present sufficient and adequate guarantees for the execution of technical and organizational measures and that they will only act in accordance with the instructions of STCP, E.I.M., S.A..

# Deadline for data retention

Personal data will be kept for the periods established by law or for the period that proves to be strictly necessary for the pursuit of the purposes that motivated their collection and processing, after which they will be deleted or anonymised.

## Right of holders in relation to data

Under the terms of the General Data Protection Regulation, the data subject has rights, namely:

- a) Right of access: the right to obtain from the controller confirmation that the personal data concerning you are or are not being processed and, if that is the case, the right to access your personal data and the way how they are treated:
- b) Right of rectification: the right to obtain, without undue delay, from the controller, the rectification of incorrect and/or incomplete personal data concerning you;
- c) Right to erasure of data ("right to be forgotten"): the right to obtain from the person responsible for the treatment, the erasure of your personal data, without undue delay, when:
  - The data is no longer necessary for the purpose for which it was collected or processed;
  - The holder has withdrawn his consent, unless there is another legal basis for the respective treatment;
  - The holder opposes the treatment, except when there are prevailing legitimate interests that justify it;
  - Personal data was processed unlawfully;
  - By legal obligation, arising from Union law or from a Member State to which the controller is subject.
- d) Right to limitation of treatment: the right to obtain from the person responsible for the treatment a limitation of treatment, if one of the following situations occurs:
  - Challenge the accuracy of the personal data, for a period that allows the controller to verify its accuracy;
- The processing is unlawful and the data subject opposes the erasure of personal data and requests, on the other hand, the limitation of its use;
- The controller no longer needs the personal data for processing purposes, but these data are required by the holder for the purposes of declaring, exercising or defending a right in legal proceedings;
- If you have objected to the processing of the data, until it is verified that the legitimate reasons of the controller prevail over those of the data subject.
- e) Right to data portability: the right to receive personal data concerning you and that you have provided to the controller, in a structured, commonly used and machine-readable format, and the right to transmit this data to another controller for the processing without the person responsible to whom the personal data were provided being able to prevent it, when:
  - The treatment is based on consent or the performance of a contract; It is
  - Processing is carried out by automated means.
- f) Right of opposition: the right to object, at any time, to the processing of personal data concerning you, including profiling, except when compelling and legitimate reasons for such processing prevail over the interests, rights and freedoms of the data holder.
- g) Automated individual decisions, including profiling: the right not to be subject to any decision taken exclusively on the basis of automated processing, including profiling, unless the decision:
  - It is necessary for the conclusion or performance of a contract between the data subject and a controller;
  - Is based on the consent of the data subject;
- Is authorized by Union or Member State law to which the controller is subject, and which also provides for adequate measures to safeguard the rights and freedoms and legitimate interests of the data subject;
- h) Revocation of consent: the right to withdraw your consent at any time. The withdrawal of consent does not compromise the lawfulness of the processing carried out based on the previously given consent or on any other basis of lawfulness.

#### Cookies or connection testimonials

STCP, E.I.M., S.A. uses cookies or connection testimonials – a small text file stored by the website on the user's device when he/she visits it – to improve the performance of the website and the user's experience. To find out more about cookies and how STCP, E.I.M., S.A. uses them, see the <u>Cookie Policy</u>.

# **Data security**

STCP, E.I.M., S.A. uses a set of security technologies, tools and procedures to protect your personal data from unauthorized access, use or disclosure.

# Privacy policy update

This privacy policy will be permanently updated, with the update date being changed accordingly.