

PRIVACY AND DATA PROTECTION POLICY

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1. Framework

The Casais Group (“Group”) presents this Privacy and Data Protection Policy, which reflects the organisation’s commitment to protecting the personal data it collects, uses, records and processes in the context of pursuing the activities of its member companies.

The purpose of this Policy is to ensure that personal data is collected, used, recorded and processed in a transparent, secure and lawful manner, thereby guaranteeing all the legal requirements enshrined in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation or GDPR) and in Law 58/2019 of 8 August (Personal Data Protection Law).

2. Personal Data Concept

For the purposes of this Policy, and in accordance with the definition set out in Article 4 of the GDPR, “Personal Data” means any information relating to an identified or identifiable natural person (‘data subject’).

A natural person is considered identifiable where he or she can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an electronic identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

3. Principles Relating to the Processing of Personal Data

Personal data are:

- a)** Subject to lawful, fair and transparent processing in relation to the data subject;
- b)** Collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes;
- c)** Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d)** Accurate and updated whenever necessary;
- e)** Kept in a form that allows the identification of data subjects for no longer than is necessary for the purposes for which they are processed;
- f)** Processed in a manner that guarantees their security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, adopting appropriate technical or organisational measures.

4. Data Controller

The person responsible for processing personal data will be the Casais Group company with which the data subjects establish a relationship.

This entity is responsible for determining the purposes and means of processing personal data, ensuring compliance with applicable legislation. The Data Protection Officer is responsible for ensuring compliance with the General Data Protection Regulation and Law 58/2019 of 8 August.

The Data Protection Officer can be contacted for any question concerning the processing of personal data using the email address: privacidade@casais.pt.

5. Conditions for Processing

All of the companies that comprise the Casais Group will only process personal data when at least one of the following situations occurs:

- The data subject has given their consent to the processing of their personal data;
- Processing is necessary for the performance of a contract to which the data subject is a party, or for pre-contractual steps at the request of the data subject;
- Processing is necessary for the fulfilment of a legal obligation to which the controller is subject;
- Processing is necessary for the protection of the vital interests of the data subject;
- Processing is necessary for the purposes of the legitimate interests pursued by the Casais Group or by third parties, unless the interests or fundamental rights and freedoms of the data subject that require the protection of personal data prevail.

6. Storage Period

The personal data processed by the Casais Group will be stored in accordance with the time limits established by applicable legal or regulatory standards or, in the absence thereof, only for the period strictly necessary for the fulfilment of the specific purposes for which they were collected.

7. Rights of Data Subjects

Data subjects are guaranteed all legally established rights, namely:

- **Right of access to personal data:** The data subject has the right to obtain confirmation as to whether or not their personal data is being processed. If they are, the data subject has the right to access their personal data and other information under the terms of Article 15 of the GDPR.
- **Right to rectification:** The data subject has the right to request the rectification of personal data that is inaccurate or incomplete.
- **Right to erasure of data ('right to be forgotten'):** The data subject has the right to request the erasure of their personal data.
- **Right to restriction of data:** The data subject has the right to request restriction of processing.
- **Right to data portability:** The data subject has the right to receive personal data concerning him or her in a structured, commonly used and machine-readable format and the right to transmit this data to another controller.

- **Right to object:** The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data. The controller shall cease processing the personal data unless it has compelling legitimate grounds for such processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

- **Right to withdraw consent:** The data subject has the right to withdraw their consent at any time, provided that the processing of the data is based on the consent of the data subject and there is no other legal basis that legitimises such processing. Withdrawal of consent does not jeopardise the lawfulness of the processing carried out on the basis of the consent previously given.

- **Right to lodge a complaint:** All data subjects have the right to lodge a complaint with a national supervisory authority - the National Data Protection Commission ([CNPD](#)) - if they feel that their rights are being violated.

8. Exercise of Rights

The Casais Group guarantees data subjects the exercise of their rights, namely the right of access, rectification, erasure, restriction of processing, portability and opposition.

If the data subject wishes to exercise their rights, they can do so at the following addresses:

Grupo Casais – Contact Details

A/C Data Protection Officer

Rua do Anjo, n.º 27, Apartado 2702, 4700-565, Braga

Telephone: +351 253 305 400 (Call to national landline)

Or using the email address: privacidade@casais.pt

With regard to the right to complain, the data subject must submit a complaint directly to the National Data Protection Commission.

9. Personal Data Security

The Casais Group has implemented appropriate technical and organisational measures to guarantee the protection of personal data, as well as to ensure the rights of data subjects, preventing possible breaches, unauthorised access or any form of illicit processing.

A ‘personal data breach’ is considered to be a breach of security that causes the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or subject to any other type of processing.

10. Comunicação

In carrying out their activities, the companies that make up the Casais Group may need to communicate or grant access to the personal data of the respective subjects to other entities. To this end, they must adopt appropriate technical and organisational measures that duly ensure the protection of personal data.

In effect, personal data may be shared or accessed by the following entities:

- Companies belonging to the Casais Group;
- Entities that provide services to the Group, such as IT support, document management, legal advice or human resources management;
- Public authorities.

11. Approval and Analysis

This Policy must be proposed and submitted by the Compliance Department to the Board of Directors for approval.

This Policy may be amended at any time, and the respective changes shall be duly published on the Group’s website.

In addition, this Policy must be reviewed periodically, at most every three years, or whenever changes occur that significantly affect the principles established herein.

Any proposed revision shall be submitted to the Board of Directors for approval.

Version	Approval	Approval Date	Description of Change
1	Board of Directors	19/05/2025	Policy Approval



HEADQUARTERS

Rua do Anjo, 27 · Mire de Tibães
Apartado 2702
4700-565 Braga · Portugal

P (+351) 253 305 400

LISBON DELEGATION

Rua do Pólo Norte, nº 14
Escritório 1.1
1990-266 Lisboa · Portugal

P (+351) 218 959 014 / 5

casais.pt