

PRIVACY AND PERSONAL DATA PROTECTION POLICY

1. Legal framework

This Privacy and Personal Data Protection Policy sets out the rules applicable to the processing of personal data carried out by **Movelar – Mário F. Rino, Lda.**, within the scope of its activities, in accordance with:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation – GDPR);
- Law No. 58/2019 of 8 August (ensuring the implementation of the GDPR in the Portuguese legal system);
- Law No. 41/2004 of 18 August (electronic communications), as amended;
- Guidelines and decisions of the Portuguese Data Protection Authority (CNPD);
- Guidelines of the European Data Protection Board (EDPB).

This policy applies to all personal data processing operations carried out by the company, regardless of the means used.

2. Identification of the Data Controller

The Data Controller is:

- **Company name:** Movelar – Mário F. Rino, Lda.
- **Tax ID (NIF):** 500898006
- **Registered office:** Zona Industrial de Porto de Mós, Portugal
- **General contact:** movelar@movelar.pt

Data Protection Officer (DPO)

- **Name / Role:** Not formally appointed (GDPR contact ensured internally)
- **GDPR contact:** canal.confidencial@movelar.pt

3. General principles of data processing

The company ensures that personal data processing complies with the following principles:

- Lawfulness, fairness and transparency;
- Purpose limitation;
- Data minimisation;
- Accuracy and updating;

- Storage limitation;
- Integrity and confidentiality;
- Accountability.

4. Categories of data subjects

This policy applies to the following categories of data subjects:

- Employees;
- Job applicants;
- Trainees and trainers;
- Customers (natural persons);
- Suppliers and service providers (natural persons);
- Website users.

5. Employees' personal data

5.1 Purposes and legal basis

Employees' personal data are processed for the following purposes, based on the respective legal grounds:

- Employment relationship management – performance of a contract (Art. 6(1)(b) GDPR);
- Compliance with legal obligations (Tax Authority, Social Security, ACT, OHS) – legal obligation (Art. 6(1)(c));
- Payroll processing and benefits – legal obligation and contractual performance;
- Training management – legal obligation and legitimate interest;
- Occupational health and safety – legal obligation and Art. 9(2)(h) GDPR.

Health data processing is limited to what is strictly necessary and is only accessible to qualified health professionals.

5.2 Categories of data

- Identification and contact data;
- Professional and contractual data;
- Payroll, tax and financial data;
- Attendance and access control data;
- Health data (where legally required).

5.3 Data retention periods

Personal data are retained only for the period necessary to fulfil legal and contractual purposes, namely:

- Employment data: legally applicable periods;
- Tax and accounting data: 10 years;
- Data relevant for pensions or future rights: specific legal periods;
- Data required for legal proceedings: until final court decision.

6. Recipients and processors

Personal data may be disclosed to:

- Public authorities, where legally required;
- Financial institutions;
- Insurance companies;
- Training entities;
- Occupational health and safety service providers;
- Auditing and certification bodies;
- IT service providers.

All processors are bound by written agreements ensuring GDPR compliance.

7. Data subjects' rights

Under the GDPR, data subjects have the right to:

- Information;
- Access;
- Rectification;
- Erasure;
- Restriction of processing;
- Data portability;
- Objection to processing;
- Not to be subject to automated decision-making.

Requests must be submitted in writing to the GDPR contact, and a response will be provided within a maximum of 30 days.

Data subjects also have the right to lodge a complaint with the Portuguese Data Protection Authority (CNPD).

8. Customers' and suppliers' data

Customers' and suppliers' personal data are processed within the scope of the contractual relationship, invoicing, compliance with legal obligations and, where applicable, based on the company's legitimate interests.

Processing for direct marketing purposes only takes place where an appropriate legal basis exists, always ensuring the right to object.

9. Website, cookies and electronic communications

Use of the website may involve the processing of personal data, in accordance with the specific cookies and online privacy policy.

10. Security measures

The company implements appropriate technical and organisational measures to ensure the security of personal data, preventing unauthorised access, loss, destruction or unlawful disclosure.

11. Record of processing activities

The company maintains a Record of Processing Activities (RoPA), in accordance with Article 30 of the GDPR.

12. Policy updates

This policy may be reviewed whenever necessary, particularly in response to legislative changes or CNPD guidance.

Effective date: 1 January 2025