
POLICY

Privacy of the website www.adp.pt (and microsites)

Approval date: 2023/03/09

Version: 002

WEBSITE PRIVACY POLICY WWW.ADP.PT (and Microsites)

Introduction

AdP – Águas de Portugal, SGPS, S.A., subject to full identification in the following chapter, hereafter **AdP SGPS**, is dedicated to ensuring the privacy and the protection of the personal data entrusted by users of its www.adp.pt website and the microsites <https://www.portaldaagua.pt/> and <https://jornadasadp.pt/> and as well as the microsites detailing the annual results of the Águas de Portugal Group.

The current Privacy Policy aims to strengthen our commitment and efforts to compliance with the general data protection, privacy and security regulations, especially Regulation 2016/679/EU of the European Parliament and Council, of 27 April 2016, relating to the protection of individuals as regards the processing of their personal data and the free circulation of this data and that revokes Directive 95/46/CE ("GDPR") and Law no. 58/2019, of 8 August ("Data Protection Law") in order to protect personal data and the privacy of data holders in accessing and utilising the Group website and its microsites and in order to provide data holders with all of the information necessary to understanding that their data are collected, what explains this collection and the ways in which their data are processed.

This Privacy Policy defines:

- The personal data that we gather and process on you as the data holder and through utilisation of our website (<https://www.adp.pt/pt/>) and its microsites;
- Where we obtain this data from;
- What we do with this data;
- How we store the data;
- The entities we transfer and divulge the data to;
- How we ensure the protection of your data rights;
- And how we comply with the data protection rules.

Responsibility for processing

AdP SGPS, with its headquarters at Rua Visconde de Seabra no. 3, 1700-103 Lisbon, registered at the Lisbon Commercial Registry Office under the single, corporate fiscal identification number of 503 093 742, with equity capital of € 434,500,000.00, is responsible for the collection and processing of the personal data of data holders under the terms and for the purposes set out in this present document in compliance with the legal requirements in effect for such matters.

The data may be handled directly by AdP SGPS or by entities subcontracted for this purpose.

Any subcontracted entity shall process the data in the name of and on behalf of AdP SGPS and under the strict obligation to comply with all instructions issued by the latter. AdP SGPS ensures that such entities provide sufficient guarantees over the implementation of the technical and organisational measures appropriate to the

purposes that the processing satisfies in accordance with the legislation in effect and furthermore ensuring the security and protection of the rights of data holders under the terms of the respective subcontracting agreement agreed.

What personal data do we collect?

Personal data are any information relating to data holders that enable their direct or indirect identification, such as names, addresses, tax numbers, number of household members, means of contact, payment details and information regarding access made by the data holders to our website.

We may collect the personal details of data holders, especially whenever subscribing to our newsletter or when requesting the sending or delivery of information through the forms contained on our website or our other contact channels, more specifically, identification details.

AdP SGPS may collect data when using the automatically processed information on the Group website and microsites. These processes serve only for the purposes of producing and analysing statistics. For further information, please consult our Cookies Policy.

Purpose of data treatment, why and for how long do we process personal data?

AdP SGPS deploys Personal Data for the following purposes:

- Management of the website and the microsites;
- Management and response to contacts received through the contact forms in accordance with the website;
- When submitting a complaint to the Águas de Portugal Group Integrity Line;
- In order to guarantee the website and microsites meet user needs through the development and publication of contents appropriate to the interests and requests expressed by users, improving the search capabilities and functions and obtaining the associated statistical information as regards the user profile type (analysis of consumer profiles).

Your personal data shall only ever be subject to processing when there is licit justification. This licit justification shall depend upon the motives according to which your personal data was collected and the need for utilisation.

We set out the feasible grounds for licit justification for the processing of your personal data on our website:

- **Implementing a contract (cf. article 6, no. I, I. b) of GDPR** – the processing necessary to implement a contract to which data holders are party, or for pre-contractual diligence on the request of the data holder.
- **Legal obligation (cf. article 6, no. I, I. c) of GDPR** – the processing necessary to comply with a juridical obligation to which the entity responsible for processing is subject. This is the case of data processing for handling complaints or the storage of data necessary to complying with specific legal obligations.

- **Undertaking functions of interest or public authority (cf. article 6, no. I, I. e) of GDPR** – the processing necessary to exercising functions of public interest or when exercising the public authority attributed to the entity responsible for the treatment.
- **Legitimate company interests (cf. article 6, no. I, I. f) of GDPR** – the processing necessary to secure the legitimate interests held by the entity responsible for processing or third parties, except when there are prevailing fundamental interests, rights or freedoms that require the protection of personal data, especially when the data holder is a minor or when such justifications AdP SGPS may not invoke when acting on behalf of the public interest and public authority.
- **Consent granted by the data holders (cf. article 6, no. I, I. a) of the GDPR** – data holders have granted their consent for the processing of their personal data for one or more specific purposes. Such is the case when signing up to our newsletter or the usage of cookies other than those strictly necessary to the functioning of the website and its microsites.

Should data processing take place, this occurs under the terms attributed to special data categories with the need for the provision of an exception to the general prohibition on processing in order to ensure the licit process in accordance with numbers 1 and 2 of articles 9 of GDPR, hence, not all of the aforementioned grounds for legitimacy are applicable.

Personal data are not maintained for any period longer than that necessary to comply with the purpose for which they were collected. In order to determine the appropriate retention period, there is the consideration of the quantity, nature and sensitivity of personal data and the purposes of processing in accordance with the Personal Data Retention Procedures and the weightings therein evaluated.

This takes into account the periods for which there is a legal requirement to retain personal data due to legal requirements or to respond to complaints.

Personal data are securely eliminated following the expiry of the defined retention period. Over the course of time, actions will be undertaken to minimise the personal data subject to processing and evaluating the scope for anonymising the data so that this can no longer be associated to data holders, without any scope for their identification and, in these cases, such information can again be processed without requiring re-notification.

The security of the personal data of holders

AdP SGPS commits to guaranteeing all the security of the information held in conjunction with all the associated resources, whether procedural, technological or human.

AdP SGPS furthermore commits to guaranteeing the protection of personal data ensuring privacy and transparency in its handling of data as regards the rights, freedoms and fundamental guarantees for personal data holders and in full compliance with the obligations stemming from the GDPR. Whenever personal data are gathered through our website and microsites, such information is transmitted via the Internet in a secure manner with recourse to high level encryption. The management of IT and system security takes place within the objective of preserving the confidentiality, integrity and the availability of personal data so as to guarantee that:

- a) There is no undue access or unauthorised utilisation of personal data;
- b) The personal data remain correct and pertinent to the purposes for which they were collected; and

- c) Personal data remain available for processing within the scope of the authorised processing objectives.

As a means of guaranteeing the preservation of personal data in accordance with the terms set out above, AdP SGPS may implement measures such as:

- a) Managing access to its assets;
- b) Maintaining activity records;
- c) Carrying out backups;
- d) Implementation of IT system redundancies;
- e) Encryption;
- f) Anonymisation or pseudonymisation.

Sharing of the personal data of holders

The personal data of holders may be shared with other companies in the Águas de Portugal Group within the scope of the aforementioned purposes, especially within the context of central Group services or joint initiatives with other companies.

AdP SGPS may transmit the personal data of holders to third parties that process the data in the name of and on behalf of AdP SGPS, which requires the access by these entities to these data and, whenever occurring, takes the appropriate, contractually stipulated, measures to ensure these entities provide sufficient and adequate guarantees for implementing the technical and organisational measures and acting only according to our instructions.

AdP SGPS may transmit the personal data of holders to third parties whenever deeming such communication is necessary and appropriate: **(i) for legal reasons in accordance with the applicable legislation; (ii) in compliance with legal obligations/orders issued by administrative or judicial entities; or (iii) in response to requests from public or governmental authorities.**

Rights of data holders

AdP SGPS hereby informs users that, as data holders, they are in possession of the following rights:

- To request any information we may hold on you as personal data and, whenever affirmative, details on the respective data and the reasons for its holding.
- To request access to personal data, receiving a copy of the personal data that we hold on you in a current format and that enables you to verify that we are dealing with this legitimately, whenever this does not infringe on the rights and freedoms of third parties.
- To request rectification of personal data that we hold on you when able to rectify, update or complement, at any moment in time, any incomplete or imprecise information we hold on you.

- To request the elimination of your personal data and able to ask at any time for the erasure of any personal data whenever a storage deadline has expired or the date processing is no longer legally valid. Your personal data are also subject to elimination or removal in cases when you have exercised your right to oppose processing and there are no other motives for maintaining your personal data. This present right is not unlimited and AdP SGPS may refuse to advance with your request in certain situations, especially when the respective data are still necessary for the purposes that justified the collection or processing is required in order to comply with a legal obligation.
- Oppose the processing of personal data in cases that depend on a public interest or another legitimate interest (or of a third party) and there is a valid motivation for such opposition. This right to opposition also extends to cases when we are undertaking personal data processing for the purposes of direct marketing. This right is indeed particularly relevant in the context of processing carried out for the purposes of direct marketing or for purposes differing to those for which the data was gathered.
- To request limitations on data processing requiring the suspension of such personal data processing, whenever a) contesting the accuracy of personal data; b) the processing is illicit and the data holders requests limitation as an alternative to elimination; c) AdP SGPS no longer requires the data for the original purpose with these having been requested from the data holders for the purposes of judicially declaring, exercising or defending a right and; d) whenever the holder has opposed the data processing through to the ascertaining of overriding and legitimate reasons invoked by AdP SGPS and prevailing over the interests, rights and freedoms of data holders.
- The right to portability: through which, under certain circumstances, data holders have the right to receive personal data on their regard and that has been submitted to AdP SGPS in a currently used and automatically read structured format, and the right to transmit the data to another entity responsible for processing without the entity responsible for having collected the data being able to prevent this.
- To withdraw consent in the limited circumstances under which this was provided for the collection, processing and transfer of your personal data for a specific motive, data holders maintain the right to withdraw their consent for such data processing at any moment in time.

How to exercise your rights

Should you wish to exercise any of these rights, please contact us via email at dpo@adp.pt or send your request in writing to Rua Visconde de Seabra no. 3, 1700-421 Lisbon.

We may need to ask you for confirmation of specific information in order to guarantee your identity and right to access the information (or to exercise any of the other rights).

This constitutes another security measure appropriate to guaranteeing that personal information is not unduly released to persons other than those with the right to such access.

Without any infringement on other means of administrative or judicial recourse, data holders retain the right to submit complaints to the National Data Protection Commission or another competent control authority under the terms of the law, whenever considering that their data are not subject to licit processing on behalf of AdP SG in accordance with the terms of the applicable legislation and this current Policy.

Alterations to the Privacy Policy

AdP SGPS reserves the right to, at any moment in time and for whatever reason the Group deems relevant, proceed with modifications or updates to the present Policy with these alterations duly publicised on the websites and microsites. We would recommend that data holders regularly consult this page to remain updated on any subsequent changes.

Irrespectively, whenever these alterations imply substantial changes to the ways in which data undergoes processing, AdP SGPS is to notify data holders through the contact details they have made available and/or by issuing a notification prominently on its websites and microsites.

Get in touch

Should you have any doubts, comments or suggestions to make about our Privacy Policy, please do get in touch with us either via email at dpo@adp.pt or by letter to the following address: Rua Visconde de Sebra no. 3, 1700-421 Lisbon.