

PRIVACY POLICY FOR THE WEBSITE WWW.ADP.PT (and all corresponding Microsites)

INTRODUCTION

At **AdP – Águas de Portugal, SGPS, S.A.**, hereafter **AdP SGPS**, we are fully committed to protecting the privacy of the personal data entrusted to our care by users of the www.adp.pt website and the <https://www.portaldaagua.pt/> and <https://jornadasadp.pt/> microsites as well as all further microsites publishing the annual results of the Águas de Portugal Group.

Through this present Privacy Policy, we aim to deepen our commitment and efforts to comply with the personal data protection and privacy legislation and information security norms, specifically the Regulation 2016/679/UE enacted by the European Parliament and Council on 27 April 2016 for the protection of individual persons as regards the handling of their data and the free circulation of the data and that inherently subsumes Directive no. 95/46/CE (“RGPD”) and Law no. 58/2019, of 8 August (“Data Protection Law”) in order to protect the personal data and privacy of the data belonging to individuals accessing and using the website and the microsites and to assist the owners of such data to understand the motives for the collection and processing of their data.

This Privacy Policy therefore defines:

- What personal data we collect and process about you as the data subject and the utilisation you make of our website (<https://www.adp.pt/pt/>) and its microsites;
- Where we obtain the data from;
- What we do with the data;
- How we store the data;
- Entities we transfer/disclose the data to;
- How we ensure your data protection rights;
- And how we comply with the data protection regulations.

ENTITY RESPONSIBLE FOR PROCESSING

AdP SGPS, with its headquarters on Rua Visconde de Seabra no. 3, 1700-103 Lisbon, registered at the Lisbon Commercial Registry Office with the unique registration and collective identification number of 503 093 742, with an equity capital value of € 434,500,000.00, holds responsibility for collecting and processing the personal data of data subjects under the terms and for the purposes defined in this current document in compliance with the respective legal obligations applicable to this field.

The data may be handled either directly by AdP SGPS or by entities subcontracted for such purposes.

Any subcontracted entity handling data in the name of and on behalf of AdP SGPS does so under the strict obligation to follow its respective instructions. AdP SGPS will ensure that these entities provide sufficient guarantees for the implementation of the technical and organisational measures necessary to ensuring that the processing meets the requirements of the legislation applicable and undertakes the security and protection of the rights of data subjects under the terms of the subcontracting contract signed by the parties.

WHAT PERSONAL DATA IS COLLECTED

Personal data represent any and all information relative to data subjects that enable their identification, such as their names, addresses, taxation numbers, size of households, contact information, payment details and as well as information as regards access by data subjects to our website.

We may gather the personal data of data subjects specifically when subscribing to our newsletter or when sending or requesting information through the digital forms on the website or our other channels of contact, more specifically, identification data.

AdP SGPS may collect, in the process of visiting and using its website and microsities, information that is automatically processed. These processes serve exclusively for the purpose of producing and analysing the resulting statistics. For further information, please see our **Cookies Policy**.

PURPOSES OF DATA PROCESSING, WHY AND FOR HOW LONG DO WE HANDLE YOUR PERSONAL DATA

AdP SGPS applies Personal Data for the following reasons:

- Managing the website and its microsities;
- Managing and responding to contacts received through the contact forms available on the website;
- Guaranteeing the website and the microsities meet the needs of Users through the development and publication of content appropriate to the interests and requests that they submit, improving the search capacities and functions of the online platforms and obtaining the associated information and statistics as regards the profile of Users (analysis of consumer profiles).

Your personal data will only be handled in accordance with the purposes established in the legislation. These legal grounds correspondingly depend on the motives for which the personal data were gathered and the need for their utilisation.

We set out below the feasible legal grounds for the processing of your personal data by our website:

- **Implementation of a contract (cf. article 6, no. 1, p. b) of the RGPD)** – The processing necessary either for the implementation of a contract to which the data subject is party or for pre-contractual due diligence on the request of data subjects.
- **Legal compliance (cf. article 6, no. 1, p. c) of the RGPD)** – The processing derives from compliance with a legal obligation to which the entity processing the data is subject. Such is the case with processing data for managing complaints or the maintenance of data necessary for complying with certain legal requirements.
- **Exercising the function of interest or public authority (cf. article 6, no. 1, p. e) of the RGPD)** – The processing becomes necessary for exercising either functions in the public interest or public authority that is invested in the entity responsible for data processing.
- **Legitimate company interests (cf. article 6, no. 1, p. f) of the RGPD)** – The need for processing arises from the effects of the legitimate interests, whether carried out by the entity responsible for processing or third parties with the exception of whenever there are fundamental interests, rights and freedoms of the data subjects, especially whenever such subjects are minors or whenever such grounds are denied with AdP SGPS duly acting in compliance with the public interest and authorities.
- **Consent of the data subjects (cf. article 6, no. 1, p. a) of the RGPD)** – The data subjects have provided their consent for the processing of their public data for one or more specific purposes. Such is the case when signing up to our newsletter or use cookies that are not strictly necessary to the smooth functioning of the website and its microsites.

Personal data are not held for any longer than the period necessary to comply with the purpose for which they were first collected. Determining the appropriate storage period takes into consideration the quantity, the nature and the sensitivity of the personal data and the purpose of the processing.

The consideration of the length of time it is necessary to store personal data also takes into account legal obligations and the need to respond to complaints.

Personal data are securely deleted following the defined period of storage. This furthermore incorporates the undertaking of actions over time to minimise the personal data subject to processing, the evaluation of the scope for anonymising the data so there is no longer any

association with individual data subjects and rendering their identification impossible and, in such case, it is feasible to process such information without again being notified.

THE SECURITY OF THE PERSONAL DATA OF DATA SUBJECTS

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

When personal data are collected through our website and its microsites, these details are delivered via the Internet in a safe channel applying a high level of encryption.

The management of information and the security of the support systems takes place within the framework of maintaining confidentiality, integrity and the availability of personal data in order to guarantee that:

- a) There is no undue access or unauthorised utilisation of personal data;
- b) The personal data is stored correctly and in keeping with the purposes for which they were collected; and
- c) The personal data remain available for processing within the scope of the purposes of their authorised processing.

SHARING THE PERSONAL DATA OF DATA SUBJECTS

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

AdP SGPS may transmit the personal data of subjects to third parties that process data on behalf of AdP SGPS, which requires access by these entities to these data, and, when this is the case, takes appropriate, contractually stipulated measures in order to ensure these entities provide sufficient guarantees appropriate to the implementation of technical and organisational measures, and acting only in accordance with our instructions.

RIGHTS OF DATA SUBJECTS

AdP SGPS informs users that, as the owners of data, they hold the following rights:

- **Request information** about the personal data we hold on them and, when affirmative, what the data are and why we have it in our possession.
- **Request access** to your personal data, receiving a copy of whatever personal data we hold on you and thereby verifying that we are handling it legitimately.
- **Request rectification** of the personal data that we hold on you at any moment with this rectification spanning both incomplete and incorrect data.
- **Request elimination** of your personal data with such requests possible at any moment

when the personal data reaches the end of its storage period or when data processing is no longer authorised. You equally hold the right to request that we eliminate or remove your personal data in cases when you have exercised your right to reject such processing.

- **Denial of personal data processing** in cases that depend on a public or a legitimate interest (or those of third parties) and there is a valid motive for such opposition. You also hold the right to reject in cases when we are carrying out processing of your personal data for purposes associated with direct marketing.
- **Request limitations on data processing** requiring the suspension of personal data processing.
- **Withdrawal of consent** under the specific circumstances in which data subjects have provided their consent for the collection, processing and transfer of their personal data for a specific motive, data subjects retain the right to withdraw their consent for that specific 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 you may deliver your request by letter to Rua Visconde de Seabra no. 3, 1700-421 Lisbon.

We may then need you to confirm specific information details in order to guarantee your identity and right to access the information (or of exercising any of the other rights).

This represents another security measure appropriate to guaranteeing that personal information is not unduly released to any person lacking any such right of receipt.

Irrespective of any other administrative or judicial approval, data subjects hold the right to submit complaints to the National Data Protection Commission or any other authority with such competence under the terms of the law should you consider that your data are not subject to appropriate and legal handling by AdP SGP in accordance with both the applicable legislation and the terms of this present Policy.

ALTERATIONS TO THE PRIVACY POLICY

AdP SGPS reserves the right to, at any moment and for whatever motive deemed pertinent, undertake modifications and updates to the current Policy with any such alterations duly conveyed on the website and the microsites. We would recommend that data subjects regularly consult this page to remain updated on any subsequent alterations.

Irrespectively, should these alterations imply substantial changes as regards the ways in which your data are handled, AdP SGPS shall notify data subjects through the contact details that they have provided and/or through placing notification in a prominent place on the website and the microsities.

SPEAK TO US

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

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