

## Data Protection

Grupo Your, as a provider of outsourcing services, processes personal data for the purpose of carrying out its duties.

### 1. Data Controller

Grupo Your is responsible for processing the personal data it collects and uses to fulfill its duties. Grupo Your processes categories of personal data that are strictly necessary, appropriate, and relevant to the pursuit of public interest purposes assigned to it by law, under powers of public authority, or in compliance with a legal obligation.

### 2. Collection of Personal Data

Grupo Your may collect data for the pursuit of its duties:

- Directly from the data subjects themselves;
- Indirectly through third parties (e.g., supervised institutions).

### 3. Security of Personal Data

Grupo Your implements technical and organizational measures to ensure that the processed personal data is not used by unauthorized third parties and is not lost. Personal data stored for processing by Grupo Your is in a secure environment.

The institutional websites of Grupo Your are covered by HTTPS, meaning that any communications between the user's browser and Grupo Your's servers are encrypted.

However, if you intend to contact Grupo Your or its employees by email, the confidentiality of the transmitted information cannot be guaranteed due to email protocol configurations. Therefore, it is recommended to communicate with Grupo Your only through the designated channels for confidential information.

### 4. Categories of Personal Data

The categories of personal data processed by Grupo Your for the fulfillment of its institutional functions and how these data are processed are detailed below.

#### a. Prudential and Behavioral Supervision Function

Possible categories of data to be processed:

- o Name;
- o Image;
- o Date of Birth;

- Identification Document;
- Tax Identification Number (NIF);
- Nationality;
- Place of Birth;
- Permanent residence or fiscal domicile;
- Email;
- Phone;
- Mobile phone;
- Gender;
- Marital status;
- Profession/position and employer entity;
- Financial data;
- Information on decisions applying penalties, security measures, fines, ancillary sanctions, or other sanctions;
- Information on held public positions;
- Family relationships.

Grupo Your, in the exercise of its supervisory functions, may process personal data of various data subjects (including shareholders, members of management bodies) of supervised entities, for purposes such as:

- Monitoring and surveillance of compliance with applicable legislation and issuance of supervisory measures;
- Examination of requests for information and/or complaints submitted by individuals and promotion of necessary actions for their satisfaction;
- Determination of potential conflicts of interest in granting credit to members of social bodies and holders of qualified interests;
- Acquisitions, increases, or decreases of qualified interests;
- Public interest archive;
- Authorization for the establishment of entities and revocation of granted authorization;
- Evaluation of the suitability of members of social bodies and essential function holders, as well as revocation of authorization for the exercise of functions;
- Authorization for the exercise of activity and revocation of such authorization;
- Disclosure of information in compliance with legal obligations;
- Issuance of recommendations, specific determinations, corrective measures, and other supervisory measures;
- Inhibition of the exercise of voting rights held by qualified participants;
- Qualification of interests by official decision of the supervisor;
- Recording of information subject to special registration and publication on Grupo Your's website, in applicable cases;
- Revocation of granted authorization or cancellation of granted registration.

Personal data may be disclosed to third parties on behalf of the exercise of public interest functions or public authority vested in Grupo Your and for compliance with legal obligations.

Personal data processed for these purposes may be retained for varying periods, depending on the nature of their specific purpose.

b. Employment and Service Contracts

Possible categories of data to be processed:

- Name;
- Date of Birth;
- Identification Document;
- Tax Identification Number (NIF);
- Permanent residence or fiscal domicile;
- Email;
- Marital status;
- Profession/position and employer entity;
- Career (evolution and vicissitudes);
- Data on professional training;
- Information on decisions applying penalties, security measures, fines, ancillary sanctions, or other sanctions;
- Academic qualifications;
- Family composition;
- Seizures;
- Annual income statement;
- Union membership;
- Identification of real estate – cadastral number;
- Workplace;
- Professional organizations;
- Attachments;
- Payroll;
- Ownership of cash deposit/securities accounts.

Grupo Your processes the personal data of its employees in the context of fulfilling the employment contract entered into with them. This processing may have various purposes, including career progression management, admission and termination of the contractual relationship, exemptions, loans, judicial discounts, analysis of worker requests, and provision of training.

These data may be retained for varying periods after the end of the contractual relationship, depending on the specific purpose of processing within contractual management.

Similarly, the data may be transmitted to various authorities, such as the:

- Tax Authority

- Training entities
- Compensation Fund for Work
- Guarantee Fund for Compensation for Work
- Insurers
- Social Security
- Fund and Pension Fund Management Company
- Courts.

Grupo Your also processes personal data in the context of contractual relationships with its suppliers and subcontractors.

#### c. People Recruitment

Possible categories of data to be processed:

- Name;
- Image;
- Identification Document;
- Tax Identification Number (NIF);
- Career (evolution and vicissitudes);
- Data on professional training;
- Information on decisions applying penalties, security measures, fines, ancillary sanctions, or other sanctions;
- Family composition;
- Proficiency in foreign languages;
- Employer entity;
- Academic qualifications;
- Electronic identifiers;
- Workplace.

This personal data is processed based on the consent of the data subject, obtained prior to the provision of data by the candidate.

During recruitment, the data subject's information may be transmitted to Grupo Your service providers responsible for parts of the candidate selection process.

#### d. Users of the Institutional Website

Possible categories of data to be processed:

- Name (event forms);
- Date of Birth (event forms);
- Tax Identification Number (NIF) (event forms);
- Permanent residence or fiscal domicile (event forms);
- Email (event forms and contact with the company);
- Employer entity (event forms);
- IP address (cookies).

Grupo Your does not collect personal data of users of its website without

obtaining their prior consent (e.g., through form completion or consent to use cookies).

However, by completing forms provided by Grupo Your or by contacting it through designated channels, Grupo Your may process the data for specific purposes.

Grupo Your's institutional website uses cookies to access some of its content and the effectiveness of its features, so it is recommended to read Grupo Your's cookie policy.

Consent for cookies can be given and withdrawn at any time. Regarding cookies, Grupo Your's institutional website uses Google Analytics, and it cannot be guaranteed that personal data is not transferred to or needed to be transferred to U.S. authorities.

Additionally, Grupo Your is not responsible for the content or privacy policies of other linked pages, so it is advisable to separately read those policies.

e. Social media

Possible categories of data to be processed:

- Name;
- Image;
- Voice.

Grupo Your may process photographs and videos of data subjects to document its activities and events.

Personal data processed by Grupo Your for events is stored based on the consent of data subjects and is deleted once the purpose for processing is fulfilled.

Moreover, Group Your is present on various social media platforms, each with its own privacy and data protection policy. These social networks may be used for institutional communication purposes.

## **5. Transfer of Personal Data**

In the course of institutional functions, and whenever required or legally and contractually permitted, Grupo Your may transfer personal data to other entities.

### **5.1. Management of Cookies and Institutional Website**

The management and maintenance of Grupo Your's institutional website and its functionalities are handled by service providers located in third countries outside the European Economic Area (EEA) or whose parent companies are established outside the EEA.

The use of these services implies that Grupo Your cannot guarantee that personal data processed by these service providers cannot be transferred to a third country.

## 5.2. Exercise of Rights by Data Subjects

Grupo Your provides data subjects, in accordance with the law, with the appropriate means to exercise their rights to information, access, rectification, complaint, limitation, or deletion of their data. Data subjects can exercise their rights by:

- . Via postal mail; or
- . By email to [geral@grupoyour.pt](mailto:geral@grupoyour.pt).

If they believe their rights have not been properly addressed or wish to file a complaint, they can contact Grupo Your through the following means:

- By e-mail: [geral@grupoyour.pt](mailto:geral@grupoyour.pt)
- By postal mail:
  - Espaço Your
  - Rua Cidade de Córdoba 2A
  - 2610-038 Alfragide
  - Portugal

## 5.3. Right of Access

The data subject has the right to receive a copy of the personal data held by Grupo Your that concerns them, as well as to obtain information on how Grupo Your utilizes this data.

This right can be exercised at any time, provided Grupo Your retains the personal data of the data subject and without prejudice to any specific restrictions.

## 5.4. Right to Rectification

The data subject has the right to request the update or correction of personal data concerning them if it is incorrect, outdated, or incomplete.

This right can be exercised at any time, provided Grupo Your retains the personal data of the data subject.

## 5.5. Right to Erasure

The data subject has the right to request the deletion of their personal data from the records and systems of Grupo Your.

This right only applies in specific circumstances, namely when the purpose for processing ends, or if the data subject withdraws their consent for processing and there is no other legitimate basis.

This right cannot be exercised if personal data is necessary for legal obligations or tasks carried out in the public interest or in the exercise of public authority.

## 5.6. Right to Limit Processing

The data subject can request that Grupo Your restrict the type of processing done on their personal data, i.e., Grupo Your can only keep them stored, with some exceptions. This right can only be exercised in a limited range of situations, including:

- Between the moment the data subject disputes the accuracy of the personal data stored by Grupo Your and the moment Grupo Your provides its response.
- If personal data is being processed unlawfully, but the data subject does not want it deleted.
- If Grupo Your no longer needs the personal data, but the data subject needs it for judicial purposes.
- If the data subject has objected to the processing of their data, and Grupo Your is verifying whether the legitimacy of the processing overrides the rights and interests of the data subject.

## 5.7. Right to Data Portability

The data subject has the right to obtain their personal data in a format that allows them to transfer it to a third-party institution, provided the legitimacy basis for processing is the consent of the data subject, the fulfillment of contractual obligations, and if processing is carried out in an automated manner.

If technically possible, the data subject can request that Grupo Your directly transfers their personal data to the third-party institution.

However, this right cannot be exercised if the legitimacy basis for processing is compliance with a legal obligation or the exercise of functions of public interest or public authority by Grupo Your.

Therefore, this right cannot be exercised concerning many of the personal data stored by Grupo Your, as most of these are processed for the obligations of the institution and the pursuit of public interest.

#### 5.8. Right to Object

The data subject has the right to object to the processing of their personal data by Grupo Your in certain circumstances.

Regardless of the data subject's objection, Grupo Your may continue to use the personal data of the data subject if there is a legitimate basis justifying it or if the data is necessary for judicial purposes.

This right can be exercised concerning processing carried out by Grupo Your in the public interest.

#### 5.9. Rights Regarding Automated Decisions and Profiles

The data subject has the right not to be subject to any decision based solely on automated processing (without human intervention) that produces legal effects or significantly affects them.

This right can only be exercised concerning automated decisions.

This right cannot be exercised if the decision is authorized by the law of the European Union or the Member State to which the data controller is subject.

#### 5.10. Revocation of Consent

The data subject has the right to revoke their consent to any processing activity carried out by Grupo Your whose legitimacy basis was consent at any time.

However, the revocation of the data subject's consent does not affect the lawful processing of personal data collected until the moment of consent revocation.

#### 5.11. Complaints to the Supervisory Authority

The data subject has the right to file a complaint with the National Data Protection Commission (CNPD) at any time if they believe that Grupo Your is not conducting lawful processing of their personal data or is not properly addressing their requests for the exercise of rights.



## **6. Doubts and Questions**

In case of doubts regarding any aspect of this data protection notice, you may contact Grupo Your at the following address [geral@grupoyour.pt](mailto:geral@grupoyour.pt).