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# Corticeira Amorim

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## Privacy Policy for Employees and Collaborators

(Approved by the Board of Directors of Corticeira Amorim, S.G.P.S., S.A. at a meeting held on 06 December 2021)

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As an employer, we need to retain and process your personal data as part of our employment/service relationship. We will retain and use data to ensure AMORIM operates smoothly and to effectively manage our relationship with you, during the recruitment process, while you are working with us, upon termination of your contract and after you have left AMORIM, always in accordance with the General Data Protection Regulation (“GDPR”) and applicable national legislation.

If you do not provide us with your personal data, we may be unable, in some circumstances, to fulfil our contractual and legal obligations and will inform you in a timely manner.

The processing of personal data is subject to rules of transparency, honesty, integrity and confidentiality, ensuring that such information is processed in accordance with the law in force. The processing of personal data also complies with the National Commission for Data Protection (CNPD) exemptions nos. 1, 3 and 4, of 1999.

Corticeira Amorim has implemented the appropriate technical and organisational measures with a view to protecting personal data against accidental or unlawful destruction or alteration, as well as preventing unauthorised access to and unlawful processing of such data.

Employees authorised to access personal data are bound by the duty of confidentiality.

### **Identification and contact details of the controller and the data protection officer**

AMORIM will be responsible for collecting and processing your personal data for the purposes of the GDPR and applicable national laws.

Corticeira Amorim also has a Data Protection Officer (DPO), who (i) monitors data processing compliance with applicable regulations, (ii) is a point of contact with the Customer, clarifying issues regarding the processing of their data by AMORIM, (iii) collaborates with the supervisory authority, (iv) provides information and advises the controller or processor on their obligations in the area of privacy and data protection.

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**AMORIM**

**Corticeira Amorim, SGPS, S.A.**

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## The personal data we process

Identification Data	Examples
Identification and contacts	Name; Citizen Card No.; Tax ID No. (NIF); Social Security No. (NISS); Address; Date of birth; Telephone and mobile
Other identification data	Qualification Certificates; Union membership no.; Photograph; Dependents' names; Family members' NIF; Dependents' date of birth
Bank details	IBAN
Health information	Medical and professional aptitude form
Biometric data	Fingerprints

## Why we process your personal data

We are required to retain your personal data for the purposes listed below:

1. Firstly, we must process your personal data on the basis of our employment/service relationship, including for the purposes of managing wages and entitlements, attendance and holidays, work visas and business travel;
2. We also use your data, including your photograph, to allow you to be identified correctly, for example on the intranet and the internal platform [linkpeople.amorim.com](http://linkpeople.amorim.com), in the e-mail exchange service and in other tools;
3. We process your health data in accordance with the legally applicable Occupational Health and Safety provisions or with your [consent](#);
4. We only process your biometric data for the purposes of access control, [meal reservations](#), and in accordance with the law;
5. To protect our facilities, we use a video surveillance system, through which your image can be captured. We retain the images taken for a limited period of time, in accordance with applicable law. We do not use these images for performance evaluation purposes, but we must be able to review them in the event of security incidents or upon request by law enforcement or judicial authorities;
6. Since we need to ensure the resources are being used correctly, including telephones, computers and laptops, internet, and also for security reasons, we carry out limited monitoring of such resources, in accordance with the National Data Protection Commission's guidelines in this regard;
7. Likewise, if you use a company car, we need your personal data for the applicable documentation and/or supporting equipment, without prejudice to the mandatory safeguarding of your privacy;
8. We sometimes use your personal data with the aim of improving AMORIM's efficacy, for example with training activities and through performance evaluation.

## Legal grounds for processing personal data

The storage and processing of your personal data will allow us to:

- a) Perform the existing work or service contract, particularly with regard to points 1 and 2 of the previous section;
- b) Comply with legal obligations, in accordance with points 3 and 4 of the previous section, without prejudice to the possibility of obtaining consent;
- c) Ensure AMORIM's security, proper function and efficiency, in accordance with our legitimate interests, as per the remaining points 5 to 8 of the previous section.

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## Sharing personal data with third parties

Personal data will not be marketed or sold to third parties. However, we may share your personal data with third parties where necessary for the purpose of complying with contractual or legal obligations or due to our legitimate interest as an employer, unless such interest should not override your interests or fundamental rights and freedoms. Third parties could be:

- a) Public Authorities (Tax Authority, Authority for Working Conditions, and also Social Security);
- b) Bank entities for the purpose of payroll processing;
- c) Insurers in the case of occupational accident insurance or other types of insurance;
- d) Car rental/leasing companies;
- e) Companies that process any flexible benefits provided to you, for example meal vouchers, among others;
- f) Travel agencies or transport companies, in the event of business travel;
- g) Embassies and consular offices of the countries where you currently reside for work purposes (work visas);
- h) Police and judicial authorities, in the event of incidents concerning the security of the premises;
- i) Training companies, whenever AMORIM employees or collaborators undergo training.

## Transfer of personal data to third countries

AMORIM may need to transfer your personal data to a third country outside the European Union that is not on the list of countries that the EU has already considered to have adequate levels of personal data protection in place. In such cases, AMORIM will ensure that data transfers are carried out in strict compliance with applicable legal regulations.

## How long your data is kept

Physical and digital data will be kept by AMORIM for the period strictly necessary and legally required, after which it will be deleted. The legal time periods currently in force are as follows:

- Recruitment: records of recruitment processes (e.g. invitations, vacancy notices, number of applications, number of candidates in interviews, test results): 5 years (Article 32 of Law no. 7/2009 of 12 February), after which time the records will be destroyed or anonymised;
- Employee Register: 5 years after the employee leaves the company, during which time it is possible to make corrections in tax and social security matters;
- Training and Performance Evaluation: until the termination of the employment relationship;
- Evidence of contribution compliance to the social security and tax authorities, pay slips and salary processing: 10 years (or 12 years for documents relating to the 2014 and 2015 tax periods), the period required for retaining accounting documents (Article 123 of the Portuguese Corporate Tax Code or "CIRC");
- Biometric record: data should only be kept during the performance of duties, and must be deleted after termination of employment;
- Video surveillance images: data will be kept for a maximum of 30 days (Article 31 of Law no. 34/2013 of 16 May);
- Health information: data will be kept for minimum of 40 years (Article 46 of Law 102/2009).

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## Your rights

Under the GDPR and applicable national law, you have a number of rights regarding your personal data:

Right of Access - the right to obtain confirmation of what personal data is being processed and information about it, such as the purposes for which the data is being processed, storage periods, etc.

Right to Rectification - the right to request the rectification of personal data which is inaccurate or to request that incomplete personal data be completed.

Right to Restriction - the right to request that processing of your personal data be restricted, such as: (i) suspending processing or (ii) restricting the scope of processing to certain categories of data or processing purposes.

Right to Erasure or "right to be forgotten" - the right to have your personal data deleted, provided that there are no valid grounds for keeping it, such as cases where AMORIM has to retain the data to comply with a legal obligation or because a legal process is under way.

The controller will notify each recipient to whom personal data has been disclosed of any rectification or erasure of personal data or any restriction of processing, unless such notification proves impossible or involves disproportionate effort. If the data subject so requests, the controller will provide them with information on said recipients.

Right to Portability - the right to receive the data you have provided to us in a commonly used and machine-readable digital format or to request the direct transmission of your data to another entity that becomes the new controller of your personal data, but in this case only if technically possible.

Right to Withdraw Consent - the right to withdraw your consent for data processing at any time.

Right to Object - the right to object to processing on the grounds of legitimate interest, provided that there are no compelling or legitimate grounds overriding your interests, rights and freedoms or for defending a right in legal proceedings.

Right to Notification - the right to be notified immediately if your personal data is violated. The same notification is provided by the employer to the CNPD.

Profiling and Automated Decisions - AMORIM may profile customers based, for example, on their personal preferences or interests, in particular to provide services, enhance the quality and experience of products and services or tailor direct marketing communications, provided that such processing is necessary for the conclusion or performance of the contract between the data subject and AMORIM or is based on the data subject's consent.

Where the processing of personal data, including processing for profiling purposes, is entirely automated (without human intervention) and could produce legal effects concerning you or significantly affect you, you shall have the right not to be subject to any decision based on such automated processing, save for the exceptions provided by law, and shall have the right to have AMORIM take appropriate measures to safeguard your rights and freedoms and legitimate interests, including the right to have human intervention in AMORIM's decision-making and the right to express your point of view or challenge the decision taken on the basis of an automated processing of personal data.

Right to complain - In the event that the data subject believes that the respective processing is not in accordance with the law, they must immediately notify the controller of their disagreement so that the situation can be assessed and possibly remedied as soon as possible, as the case may be. The data subject also has the right to lodge a complaint with the supervisory authority, the CNPD, if they consider that AMORIM has not complied with the requirements of the GDPR or applicable national legislation in respect of their personal data.

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## How can you exercise your rights

The exercise of rights is free of charge, except in the case of a manifestly unfounded or excessive request, in which case a reasonable fee may be charged taking into account the costs involved.

The information should be provided in writing but may be provided orally if requested. In this case, AMORIM must verify your identity by means other than oral.

Requests should be answered within 30 days at the latest, unless the request is particularly complex.

You may exercise your rights by contacting the following address: [dpo@corticeira.amorim.com](mailto:dpo@corticeira.amorim.com).

Mozelos, 06 December 2021