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# Corticeira Amorim

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## Privacy Policy

(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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### 1. Corticeira Amorim's Commitment

Protecting privacy and personal data is one of Corticeira Amorim's fundamental commitments to its stakeholders.

Corticeira Amorim undertakes to safeguard the right to data protection, as regards information provided voluntarily and authorised by the Data Subject, which will be treated confidentially, as per current law. Such personal data will not be marketed or sold to third parties.

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.

Corticeira Amorim advises you to read this Privacy Policy and any updates.

### 2. Data controller and data protection officer

The party responsible for collecting and processing your personal data will be Corticeira Amorim, which will inform you of its activity, provide the service or supply the product, and in this context will decide what data is collected, the means by which it is processed and the purposes for which it is used.

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 stakeholder, clarifying issues regarding the processing of their data by Corticeira 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.

### 3. Personal data, personal data subjects and categories of personal data

#### What is personal data?

Personal Data is any information, of any nature and in any medium, concerning an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, for example through a name, an identification number, location data, an electronic identifier or other elements allowing the identification of that natural person.

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**AMORIM**

Corticeira Amorim, SGPS, S.A.

Edifício Amorim I

Rua Comendador Américo Ferreira Amorim, 380

4535-186 Mozelos, Portugal

[www.corticeiraamorim.com](http://www.corticeiraamorim.com)

Sociedade Aberta

Capital Social: € 133 000 000,00

Pessoa Coletiva e Matrícula: PT500077797

C.R.C. de Santa Maria da Feira – Portugal

[instagram: amorimcork](https://www.instagram.com/amorimcork)

## Who are data subjects?

The Stakeholder, a natural person, to whom the data relates and who has used Corticeira Amorim's services or products. For example, a Corticeira Amorim stakeholder will be a contact with whom a contract has been concluded for the supply of a good or the provision of a service. This group of stakeholders also includes contacts that may be targeted by Corticeira Amorim's advertising campaigns or promotional offers, as well as those who request information on the products and services marketed by Corticeira Amorim.

In this regard, Corticeira Amorim points out that it also protects personal data and respects the rights of these stakeholders.

## What categories of personal data do we process?

Identification Data	Examples
Identification and contacts	Name; company; address; telephone; mobile; fax; e-mail; position.

## 4. Personal Data Processing Basis, Purposes and Duration

### On what basis may Corticeira Amorim process your personal data?

Consent: when you have express prior consent – in writing, orally or by checking an option – and if that consent is free, informed, specific and unambiguous. Examples are your consent to send direct marketing messages; profiling; or

Contract performance and pre-contractual formalities: when the processing of personal data is necessary for the conclusion, performance and management of the contract entered into with Corticeira Amorim, such as for information requests, the preparation of service proposals, the provision of services, contact/complaint management, invoicing/collection/payments; or

Compliance with a legal obligation: where the processing of personal data is necessary to comply with a legal obligation to which Corticeira Amorim is subject, such as the communication of data to police, judicial, tax or regulatory bodies; or

Legitimate interest: when the processing of personal data corresponds to a legitimate interest on the part of Corticeira Amorim or third parties, such as for example improving service quality or detecting fraud, when the reasons for their use should prevail over the rights of the data subjects.

### For what purposes and for how long does Corticeira Amorim process your personal data?

Your personal data is only processed by Corticeira Amorim for the period of time necessary to achieve the defined purpose or, as applicable, until you exercise your right to object or be forgotten, or withdraw consent. After the end of the respective retention period, Corticeira Amorim will delete or anonymise the data, provided it does not have to be kept for another ongoing purpose.

Purposes	Examples of purposes
<b>Sales Marketing</b>	Marketing or sale of new products or services Analysis of consumer profiles Adapting and developing new products or services
<b>Institutional communication</b>	Sending institutional information about Corticeira Amorim and its Business Units – educational/awareness initiatives about the sector, activity and products
<b>Customer Management and Service Delivery</b>	Contact, information or request management Complaints management Invoicing, collection and payment management Communications within the contractual relationship.
<b>Accounting, Fiscal and Administrative Management</b>	Accounting, invoicing Commission management

	Tax information, including sending information to the tax authority.
<b>Litigation Management</b>	Judicial and extrajudicial collection Management of other conflicts.
<b>Physical security control</b>	Video surveillance of the premises

Where there is a legal or contractual obligation to comply, failure to provide personal data may give rise to a breach of that obligation.

### **What are the deadlines for processing and storing personal data?**

Corticeira Amorim processes and retains your personal data in accordance with the purposes for which they are processed. There are cases in which the law requires that data be processed and retained for a minimum period of time, namely 10 years for data necessary for notifying the Tax Authority for accounting or tax purposes or data relating to bookkeeping, as well as 7 years for the purpose of combating money laundering and the financing of terrorism.

However, whenever there is no specific legal obligation, then the data will only be processed for the period necessary to fulfil the purposes that motivated their collection and retention and always in accordance with the law and National Commission for Data Protection (CNPD) guidelines and decisions. Thus:

Corticeira Amorim will process and retain your personal data for as long as it maintains a contractual relationship with you.

With regard to the video surveillance of its premises, Corticeira Amorim will only keep recordings of images and respective personal data for a maximum period of 30 days.

Corticeira Amorim may keep other personal data for periods longer than the duration of the contractual relationship, either based on your consent, or to ensure rights or duties related to the contract, or because it has legitimate interests that justify it, but always for the period strictly necessary for the fulfilment of the respective purposes and in accordance with the CNPD's guidelines and decisions.

## **5. Mode and timing of personal data collection**

### **When and how do we collect your personal data?**

We collect personal data with your consent or within the scope of commercial relationships established with Corticeira Amorim.

The data may be collected orally, in writing or through Corticeira Amorim's website.

## **6. Privacy policy for recruitment**

The personal information and data contained in the Curriculum Vitae or other similar document or contact form for employment, sent or completed by any job applicant, by email or other means, may be subject to automated processing for the purpose of recruiting and selecting candidates.

By providing the aforementioned information and personal data to the company, the candidate gives their consent for them to be processed by the company.

Said data may be communicated to companies in the Corticeira Amorim group, as well as transferred to the database of other companies based outside of Portugal belonging to said group (where applicable) with the purpose of providing a larger area of employment opportunity.

Where the Group's recruiters are located in countries outside the European Area, the Company assures the data subject that such international transfer takes place in accordance with the law.

Any sensitive data provided, only where legally admissible, will be processed for the purposes of recruiting and selecting candidates if relevant and pertinent to these purposes, with the data being deemed as provided based on the data subject's consent.

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Corticeira Amorim will retain candidates' personal data for the time necessary to achieve the aims for which they were collected, for a maximum period of five years, in accordance with labour law (Article 32 of the Labour Code). However, if the candidate is selected, the personal data will be used to draw up the respective contract and will be included in his/her file.

## 7. Data subject rights

### What are your rights?

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.

The right to see/hear or obtain a copy of e.g. invoices, written agreements or recorded calls.

Right to Rectification - the right to request the rectification of personal data which is inaccurate or to request that incomplete personal data be completed, e.g. address, tax identification number, e-mail address, telephone contact details, or other.

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 Corticeira 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 transfer 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 or Right to Object - the right to object to or withdraw your consent for data processing at any time, such as in the case of data processing for marketing purposes, as long as there are no legitimate interests overriding your own interests, rights and freedoms, such as for example to defend 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 - Corticeira Amorim may profile stakeholders 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 Corticeira 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 Corticeira Amorim take appropriate measures to safeguard your rights and freedoms and legitimate interests, including the right to have human intervention in Corticeira 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 - the right to lodge a complaint to the supervisory authority, the CNPD, in addition to the company or the DPO.

### 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.

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The information should be provided in writing but may be provided orally if requested. In this case, Corticeira 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)

## **8. Transfer of Personal Data**

### **Under what circumstances is your personal data communicated to other entities, subcontractors or third parties?**

Your data may be transferred to subcontractors in order for them to process it on behalf of Corticeira Amorim. In this instance, Corticeira Amorim will take the necessary contractual measures to ensure that subcontractors respect and protect the stakeholder's personal data.

The data may also be transferred to third parties – entities other than Corticeira Amorim or the subcontractors – if the data subject has consented, or entities to whom the data must be communicated by law, such as the tax authority.

### **Under what circumstances does Corticeira Amorim transfer your data to a third country?**

Corticeira 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, Corticeira Amorim will ensure that data transfers are carried out in strict compliance with applicable legal regulations.

Mozelos, 06 December 2021