

Sonae IM's Recruitment Privacy Notice

1. Commitment to Comply with Applicable Data Protection and Privacy Laws

Sonae IM is committed, at all times, to comply with the applicable laws regarding, namely, Data Protection, Privacy and Information Security, in order to protect your personal data when processed by Sonae IM.

This Recruitment Privacy Notice has the purpose to inform and set out the basis on which the personal data collected from you or that you provide to Sonae IM will be processed by Sonae IM in connection with Sonae IM's (or Sonae IM's affiliate companies) recruitment processes.

Where you apply for a job opening posted by Sonae IM, these provisions will apply to Sonae IM's processing of your personal data in addition to Sonae IM's Data Protection, Privacy and Cookies Policy, accessible through the following link: https://sonaeim.csod.com/clientimg/sonaeim/emailUploads/Geral/Recruitment/Privacy_Policy_SONAE_IM.pdf.

2. Who we are

Sonae Investment Management – Software and Technology, SGPS, S.A. (“Sonae IM”), duly established under the laws of Portugal, with a share capital of € 25.650.000,00, with registered office located at Lugar do Espido, Via Norte, 4470-177 Maia, Portugal, and which is registered under the Commercial Registry Office of Maia under number 505 195 011, is the responsible company for providing the corresponding services and running the website **www.sonaeim.com**, by which the users have web access to Sonae IM's information about its commercial activities, as developed from time to time, and job opportunities posted by Sonae IM.

3. Collection and Processing of Personal Data

The types of personal data that may be subject to processing by Sonae IM for the purposes below defined are the following:

- Name;
- E-mail;
- Phone number;
- Address;
- Date of birth;
- Qualifications/Experience/Employment history;
- Skills and expertise;
- Information about your company, such as the name and your role within the company, to the extent applicable.

Sonae IM may search various public professional databases which may include your personal data (include your CV or Resumé), to find possible candidates to fill Sonae IM's job openings. Sonae IM may also receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

Where Sonae IM finds you or obtains your personal data in this way Sonae IM, if processed by Sonae IM to fill a job opening posted by Sonae IM, the corresponding processing information related to your personal data will be made available to you in accordance with the applicable data protection laws requirements.

You shall ensure, to the best of your knowledge, the truthfulness and accuracy of the information and personal data that you furnish to Sonae IM.

4. Use and Purpose of Collected Personal Data

Sonae IM may therefore **process your collected personal data for recruitment and selection processes**, which includes applications and CV's review, and internal process of selection in accordance with Sonae IM's identified needs.

Within the said processes, Sonae IM may use your personal data for the following sub-purposes:

- To consider your application in respect of a role for which you have applied to;
- To consider your application in respect of other roles;
- To communicate with you in respect of the recruitment process;
- To enhance any information that we receive from you with information obtained from third party data providers;
- To find appropriate candidates to fill Sonae IM's and/or Sonae IM's affiliate companies job openings.

The legal basis for the said processing is (i) the necessity to take steps at the request of the relevant data subject prior to entering into a contract with Sonae IM and/or a Sonae IM affiliate company, and (ii) the necessity for the purposes of the legitimate interests pursued by Sonae IM and/or a Sonae IM affiliate company in reviewing the applications and submitting the candidates to an internal selection process, in accordance with previous defined criteria.

5. Retention of Personal Data

Sonae IM will retain your personal data for the said purposes for a period of one (1) year after you furnish it or Sonae IM has collected the same, and, in any event, considering any applicable retention period defined by applicable law (legal obligation).

If you wish to change your personal data or request that we no longer use it, in accordance with the applicable law, please contact us through the following e-mail contact: recruitment@sonaeim.com.

6. Data Transfer to Third Parties

Sonae IM does not transfer your personal data to third parties, except where needed for the execution of contracted services and/or for compliance with legal obligations that are applicable to Sonae IM.

Sonae IM may also share and transfer your personal data collected for the purposes hereunder with Sonae IM's affiliate companies for the exclusive purpose of consideration of your application for job opportunities that may be open in such affiliate companies of Sonae IM.

Such transfer to third parties is, in any case, made in accordance with the applicable data protection law, and within the defined purposes and legal basis.

Sonae IM may therefore share the personal data, to the extent strictly necessary, with the following entities:

- Public entities, within the necessary compliance of legal obligations applicable to Sonae IM;
- Sonae IM's affiliate companies for the exclusive purpose of consideration of your application for job opportunities that may be open in such affiliate companies of Sonae IM;
- Service providers that provide services to Sonae IM within the above defined purposes.

In these circumstances and where necessary, Sonae IM will only use subcontracted entities which present sufficient guarantees to carry out appropriate technical and organizational measures in a way that the processing meets the requirements of the applicable standards in accordance with the level of security appropriate to the risk and sensibility of the personal data in question, and such guarantees will be established by contract signed between the Sonae IM and each of these third parties.

7. Your Rights under the GDPR as a Data Subject

Under the, and in accordance with, the GDPR, as data subject and in relation to the personal data processed by Sonae IM, you have the right to request from Sonae IM **access** to, **rectification** or **erasure** of your personal data or **restriction of processing concerning you** or to **object to processing**, as well as the **right to data portability**.

We will use reasonable efforts, within our legal duty, to supply, correct or delete personal data about you on our files.

For the said purposes, please contact us through the following e-mail contact: recruitment@sonaeim.com. Where the processing is based on your consent for the relevant processing and purpose, you have the **right to withdraw consent at any time**, without affecting the lawfulness of processing based on consent before its withdrawal.

Without prejudice of all the means of contact between you and Sonae IM, you have, in any case, the **right to lodge a complaint with a supervisory authority**.