

# Talent Acquisition -Privacy, Personal Data Treatment and Cookies Policy

Confidentiality: Public Information



# PRIVACY AND PERSONAL DATA TREATMENT POLICY

This communication explains what we do with your data, fully reflecting our personal data protection policy.

This policy was written with the purpose of protecting our Users' data, strictly respecting the existing regulations in EU law on data protection and privacy for all individuals, namely the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, hereinafter "GDPR").

#### WHO WE ARE

"Devoteam" is a reference to the Devoteam group in Portugal, which includes a number of companies, including BOLDINT, S.A. (NIPC 509216595, headquartered at Av. Dom João II 43, 1990-084 Lisboa, Portugal, email bold@devoteam.com and telephone number +351 217 959 541), entity responsible or co-responsible for the collection and processing of your personal data, that decides which data are collected, the means of processing and the purposes for which the data are processed.

Therefore, when in this Policy we refer to Devoteam, we are referring to BOLDINT, S.A. as well as to each of the Companies that constitute the respective Group in Portugal.

If you wish to contact us regarding our use of your Personal Data or object to the processing of your Personal Data, please send an email to our Data Protection Officer at pt.compliance@devoteam.com.

#### II. DATA COLLECTION AND PURPOSE OF ITS TREATMENT

The collected personal data will be processed and stored by Devoteam and are intended to respond to requests from users through the available communication channels regarding the submission of applications for current or future employment opportunities in our company.

In order to find the best job offers Devoteam, collects the following personal information: name, e-mail, telephone, birth date, professional experience, educational information and data in curriculum vitae with or without photo, which are willingly provided by you in our available communication channels. We note that the data in question are only those required and do not exceed the original purpose for which they were collected.

Pg. 2 of 7

Rev. 3.0

Date: 20/06/2022



Without prejudice to compliance with legal rules regarding the retention and transmission of data for legal or legally enforceable purposes, the data provided will be processed automatically, only being required for recruitment purposes (for current, future employment opportunities or for a spontaneous application).

Data will be kept in an internal database, so that at any time they can be accessed by Devoteam employees and used for recruitment purposes in the context of professional opportunities that may arise.

Data collected may also be used for recruitment activity purposes, such as the selection and management of applications, promotion of current and future job opportunities, and employer brand events.

The treatment of the data mentioned above is legitimised by its consent, that is given in a free, spontaneous and clarified form. Consent can be withdrawn, at any time, without affecting the lawfulness of the treatment already carried out, by simply sending an email to <a href="mailto:pt.compliance@devoteam.com">pt.compliance@devoteam.com</a>.

# III. COMMUNICATION TO THIRD PARTIES OF PERSONAL DATA

Within the scope of the purposes mentioned above and only when concrete employment opportunities arise, Devoteam may transfer the data collected to its clients or potential clients based in Portugal, inside or outside the European Union. Only the essential data for the same recruitment will be given (name and data enclosed in the curriculum vitae), and all the necessary security measures will be taken.

#### IV. SECURITY MEASURES

Rev. 3.0

Date: 20/06/2022

Devoteam declares that it has implemented and will continue to implement the necessary technical and organisational security measures to ensure the protection of all personal data provided and prevention of its modification, loss, unauthorised treatment and / or access, considering the current state of technology, the nature of the stored data and the risks to which they are exposed.

We use or subcontract secure data networks, protected by robust firewalls and password protection systems.

We may subcontract a variety of services to suppliers to meet our needs for hosting, authentication, storage and telecommunications, etc., including without limitation the storage of personal data. We shall not be responsible (including, without undue limitation) nor be liable for acts of our suppliers or subcontractors, in case of data transfers.



We may use third parties to help us operate our websites and applications, authenticate users and provide additional services, and may share personal data with our service providers or product suppliers to or through websites (eg: website hosting companies or databases providers, authentication service providers, address hosting companies, e-mail service providers, analytics companies, distribution companies and other similar service providers who use this information on our behalf).

Personal data obtained through our available communication channels are incorporated into a database owned by Devoteam. This database is only accessible to authorised employees for the processing of this data in the exercise of their functions, with all accesses being documented. Appropriate levels of protection have been implemented to prevent data from being changed, deleted or treated without authorization.

#### V. THE EXERCISE OF DATA SUBJECTS' RIGHTS

According to the GDPR regulation, data subjects may exercise at any time their rights of access, correction, deletion, limitation, opposition, portability and withdrawal of consent, by written request using any of the following means, specifying the right or rights the user wishes to exercise:

#### - E-mail:

pt.compliance@devoteam.com

## Address:

Devoteam
Data Protection Officer
Avenida D. João II, nº 43 – 9°
1990-084 Lisboa, Portugal

#### VI. DATA RETENTION

The data provided shall be kept for the necessary period to achieve the purposes they were collected for.

#### VII. CONTROL AUTHORITY

Rev. 3.0

Date: 20/06/2022

Under the legal terms, the data subjects have the right to submit a complaint regarding the protection of their personal data to the competent control authority, the National Data Protection Commission (Comissão Nacional de Proteção de Dados - CNPD).



### **COOKIES POLICY**

#### I. WHAT ARE COOKIES?

The website uses cookies, which are small text files that are sent to the user's computer, cellphone or any other device used to visit a web page and that provide the website owner with information about your navigation or a code that identifies the user (henceforth, "Cookies").

When browsing this web page, there are session cookies and persistent cookies being used, that can belong to the website owner or to third parties.

Session cookies are cookies created to collect and store data while the user is accessing the webpage. These cookies are usually used to store information that is only important for the service provision for one single moment.

Persistent cookies are cookies where the data is stored in the terminal and can be processed and then accessed for a certain period, that is defined by the cookie responsible and can vary between a couple of minutes to several years.

#### II. WEBSITE COOKIES

Rev. 3.0

Date: 20/06/2022

Cookies created or managed by the person responsible for the web page. The web page can use its own persistent cookies with the aim of customising the navigation by recording the default language for repeated visits by a user.

#### III. COOKIES FROM THIRD PARTIES

The following table provides a brief explanation about the cookies we used and why.

Entidade	Finalidade	Mais informações
Facebook	Cookies used to connect with Facebook –	Click <u>here</u> to find more about the
	identification of the user, access browser, and	way Facebook uses your
	the like and share options.	information
AddThis	Save statistical information about social	
	interactions performed.	
Google	These cookies are used to collect information	Clique aqui para saber mais sobre
Analytics	about how visitors use our website. We use	a proteção da privacidade no
	the information to create reports and to help	Google.



Rev. 3.0

Date: 20/06/2022

us improve the site. Cookies collect information anonymously, including the number of visitors, the sites they come from, the pages they have visited, and the number of times an item is shared and how many new visits are due to that sharing.

This website uses data from the Google ad network in connection with Google Analytics to collect information about your visitor's demographics, remarketing lists and other statistical data to know.

better visitor habits. This cross-information between Google Analytics allows us to better communicate with visitors and potential Click <u>here</u> to find more about the privacy protection on Google.

If you don't want Google Analytics to detect the websites you visit, go to

http://tools.google.com/dlpage/ga optout. In this website address you can edit your cookies settings.

#### IV. DEACTIVATION OR ELIMINATION OF COOKIES

Through your settings, most browsers allow you to have a certain control over most cookies. To get more information about cookies, including which cookies were installed and how they can be managed or eliminated, visit <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>.

If you don't want your web visits to be detected by Google Analytics, go to <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>.

# V. UPDATES AND MODIFICATIONS OF THE COOKIES POLICY

Devoteam can modify this Cookies Policy according to new legal or regulatory demands, or to adapt the policy to instructions dictated by the National Data Protection Commission (Comissão Nacional de Proteção de Dados - CNPD) or other law changes. Whenever significant changes are made to the Cookie Policy, these will be communicated to the user, through an informative warning on the editor's web page.



Rev. 3.0

Date: 20/06/2022

If you want to find more information about the way we use Cookies, you can email us at pt.compliance@devoteam.com.

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