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PRIVACY POLICY

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GENERAL PROVISIONS

Information is an essential asset of the Navarra Group and its privacy is a fundamental pillar.

The General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) has only strengthened the procedures already in place in the Group regarding the personal data of employees, customers, suppliers, service providers or any other partner.

The Navarra Group, as the controller of the data it collects, guarantees that the data is processed in accordance with the obligations arising from the GDPR.

Secrecy, confidentiality and responsibility are keywords for all its employees.

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NATURE OF OUR BUSINESS

The Navarra Group was founded in 1977 in the city of Braga, located in the industrial area. Its main business activities are extrusion, surface treatments, thermal break profile assembly and profile machining and precision cutting for a wide variety of applications. The commercialisation of aluminium profiles and accessories are also two major areas of its activity.

Navarra - Extrusão de Alumínio is the current head office of the Group and is the company with the largest aluminium extrusion capacity in Portugal, concentrating all the Group's industrial processes.

In the commercial area, the company Navarra II - Aluminium for Architecture, and the company Haste - Comércio de Alumínio commercialise and distribute aluminium systems for architecture, respectively, of the Navarra brand in 7 distribution units in Portugal and of the Haste brand in 5 distribution units in Portugal.

The companies N.2.A. and Navarra Moçambique are commercial units located in the cities of Luanda - Angola and Maputo - Mozambique.

Also, in the Portuguese-speaking African countries, in Mozambique, the Group owns a lacquering plant under the designation TAMOZ.

The management of the Navarra Group gathers the wisdom of more than 40 years of experience in the sector and the energy and innovation of the youth that represents it. Its activity is guided by the strictest ethical and legal principles, always respecting the privacy of all those whose personal data it collects and processes, whether they are employees, customers, service providers or others.

Although the Group's main activity does not consist of the direct processing of personal data, this is presented as accessory to its activity and therefore its processing is guaranteed in compliance with the obligations arising from the GDPR.

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CONTROLLER

The Navarra Group needs to collect, access and process personal data inherent and related to its main activity, which implies that it assumes the position of Data Controller with all the inherent obligations and duties:

CONSTITUTION:

NAVARRAPAR - SGPS, S.A.

NAVARRA - Extrusão de Alumínio S.A.

NAVARRA II - Alumínio para Arquitetura, S.A.

HASTE - Comércio de Alumínio, Lda.

CORINA - Imobiliária, S.A.

TAMUZ - Tratamento de Alumínio de Moçambique, Lda.

NAVARRA MOÇAMBIQUE, Lda.

N.2.A., Lda.

Head office: Navarra – Extrusão de Alumínio, S.A.

Avenida Doutor Domingos Soares, nº 18, 4710-670 Braga, Portugal

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Apartado 2476, 4701-971 BRAGA, PORTUGAL

Telephone: + 351 253 603 520/Fax: + 351 253 677 005

geral@navarraaluminio.com

DATA PROTECTION OFFICER

In order to ensure permanent compliance of internal practices regarding the protection of personal data and to efficiently guarantee the rights of data subjects, Navarra - Extrusão de Alumínio S.A. has appointed a Data Protection Officer who plays a key role in promoting a data protection culture within the organisation and contributes to compliance with the GDPR, such as data processing principles, data subjects' rights, records of processing activities, security of processing, and notification and reporting of data breaches.

The Data Protection Officer (DPO) can be contacted via e-mail dpo@navarraaluminio.com.

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PURPOSES AND GROUNDS FOR PROCESSING

The Navarra Group processes personal data exclusively to:

- A) Execution of contracts to which the data subject is a party, or for pre-contractual steps at the request of the data subject;
- B) Protection of the vital interests of the data subject or of another natural person;
- C) Compliance with legal obligations to which the controller is subject;
- D) the purposes of legitimate interests pursued by the controller or a third party, except where the interests or fundamental rights and freedoms of the data subject are overriding which require protection of personal data, in particular where the data subject is a child;
- E) If the data subject has given his or her consent to processing for one or more specific purposes.

PERSONAL DATA PROCESSING OPERATIONS

The only purpose of the personal data collected from its employees, clients and service providers, among others, is to gather the necessary information for the conclusion of the respective contracts and provision of services.

In its activity, the Group collects personal data at the moment of signing employment contracts, provision of services, purchase and sale or others, and at the moment of recruitment and selection, negotiations or contractual or pre-contractual diligences or others.

The only purpose of the data collected is for the conclusion of contracts (employment, purchase and sale, provision of services, among others), the provision of services to the data subjects and the development of their activity, fulfilling the legal and contractual obligations inherent to these contracts and their activity.

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SHARING OF PERSONAL DATA

Personal data collected in the course of the Navarra Group's business may be shared between the above companies, namely between the human resources, health and safety, marketing, management control and continuous improvement and commercial departments.

DATA PROCESSING GUARANTEES

The Navarra Group bases all its activities and extends the same requirement to third parties and subcontractors, according to the following data processing rules:

- _ Personal data will be processed in compliance with the legal regime for data processing, with this privacy policy and with the guarantee of a legal, loyal and transparent processing;
- _ The data collected is merely instrumental to our activity, being used to pursue a determined, specific and legitimate purpose, with no further processing incompatible with these purposes;
- _ Respects the Data Minimisation Principle, collecting only the data considered adequate, relevant and necessary for the purposes of collection and processing;
- _ In compliance with the Principle of Accuracy, the company keeps its data accurate and up-to-date whenever necessary, adopting and making available to its holder all measures necessary to ensure its permanent accuracy and correction, namely the right of rectification;
- _ Assumes the principle of storage limitation in such a way that it is possible to identify the subject only for the period necessary for the purposes for which the data is processed;

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_ The processing of data is in accordance with the Security Principle - protecting your data from possible unlawful and unauthorised processing, preventing any loss, destruction or unexpected damage by adopting all appropriate technical and organisational measures to ensure the security, integrity and confidentiality of data;

_ Its legitimacy for processing personal data is based on the consent of the data subject, when this is the sole cause of legitimacy, on the need to comply with the contract or pre-contractual procedures, to safeguard the vital interests of the data subject or of a third party, as well as in compliance with legal obligations or whenever the processing is necessary for the purposes of the legitimate interests of the company;

_ Whenever consent to the processing of data is requested, the Group will provide the necessary information as to the finalities of the processing and will comply with them.

SECRECY AND CONFIDENTIALITY

All Navarra Group internal and external employees have the obligation to ensure confidentiality and protection of information, as stipulated in the General Data Protection Regulation, and are obliged to keep absolute secrecy about any information or knowledge of a technical, business or other nature, acquired necessarily or involuntarily, during or as a result of the employment relationship, concerning the Navarra Group or any other persons, natural or legal, connected with it, namely other employees, clients and suppliers, unless previously authorised in writing.

Any reproduction, copy, modification, public communication, distribution or any other kind of disclosure, either free of charge or in exchange for payment, of any documents, including computer programs, publications, information contained in databases, or any other intellectual material belonging or relating to the Navarra Group or to any third party related to it, is strictly forbidden unless previously authorised in writing.

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SUBCONTRACTORS

The Navarra Group's concern to ensure confidentiality and privacy in the processing of personal data extends to its subcontractors, from whom it requires sufficient guarantees of data processing in compliance and obedience to the processing rules arising from the GDPR.

In view of the above, ensures the data subjects' confidence in the processing of their data, secrecy and confidentiality in accordance with all data processing rules and this privacy policy, as well as internal orders, instructions and procedures to respect the data subject's privacy

IMAGE RIGHTS

Your image will always be protected, and the Navarra Group will only capture, use or disclose it with your prior consent, or that of your legal representative, and always when justified by the need to facilitate work, for commercial or educational purposes, to preserve the collective memory, or to identify you for security reasons, or to facilitate communication.

Regarding the image, the holder of this right may, at any time, request the withdrawal of consent for future uses.

The personal data to which we have access is information necessary for the exercise of the Group's activity and will remain allocated to this activity, and cannot be used for any other purpose.

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SECURITY MEASURES



The Navarra Group uses security measures, including authentication tools, to help protect and maintain the security, integrity and availability of your personal data.

Makes the necessary arrangements to ensure secure processing of personal data in particular, precautionary measures to protect personal data against loss or misuse, and uses security procedures to prevent unauthorised access to such personal data.

All the personal data it collects is stored in servers that offer security guarantees, and submits its systems and security policies to periodic reviews to ensure that the data is safe and secure.

It also respects the confidentiality of your information and does not sell, distribute or in any other way make it commercially available to any third party. The Navarra Group is committed to keeping your information confidential in accordance with applicable legislation.



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RETENTION PERIODS

Retains your data only for as long as is necessary for the purpose for which it was collected.

Once the maximum retention period has been reached, your personal data will be securely destroyed.

RIGHTS OF DATA SUBJECTS

1) Right of Access: Data subjects have the right to know whether their personal data are being processed or not and to access information that is being processed about them such as the purposes of the processing and the categories of personal data processed. Also, have the right to know, where available, the origin of the data if it was not provided by the data subject. Have the right to know which are the entities acting on behalf of and in the name of the controller, third parties to whom the data is disclosed, the data retention period or the criteria used to determine that period, whether their data is subject to automated decision making and profiling. Also, if applicable, what is the underlying rationale as well as the relevance and consequences of the data processing, and, if your personal data are transferred to countries or international organisations outside the European Economic Area, what safeguards are in place so that personal data continue to enjoy an adequate level of protection after the international transfer;

2) Right to Rectification: data subjects have the right to rectify personal data when they are inaccurate or outdated;

3) Right to Erasure: data subjects have the right to request deletion of personal data only in the following circumstances:

- _ The data is no longer necessary to achieve the purpose for which it was collected and there is no legal requirement to retain it for any longer;
- _ the data subject withdrew the consent, on which the legitimacy of the processing was based;
- _ personal data are being processed in violation of the law, which requires justification on the part of the data subject;

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The background of the page features a light gray shield icon on the left side. Overlaid on the shield and the rest of the page are several glowing, wireframe spheres of varying sizes. These spheres are composed of a grid of lines and are filled with binary code (0s and 1s). The spheres appear to be floating and slightly blurred, creating a sense of depth. The overall color scheme is a mix of light grays, whites, and soft blues, giving it a clean, modern, and tech-oriented look.

- _ Opposition to data processing for marketing purposes, including the profiling that may be associated with it;
- _ When the data subject has objected to the processing pursuant to Article 21(1) of the GDPR, and there are no overriding legitimate interests of the controller;
- _ Data must be deleted as required by law;
- _ Consent for data processing has been given by the data subject's legal representatives under Article 8 of the RGPD.

Data subjects also have the right to have links disassociated from the list of results displayed after a search under the data subject name (delisting) on Internet search engines. Such hyperlinks must be individually specified in the request.


There are situations in which the right to erasure of data, as indicated, may not apply, in particular where processing of the data is necessary for the exercise of freedom of expression and information or on grounds of public interest in the area of health or for the purpose of exercising legal claims.

4) Right to Restrict Processing: It is the right that allows, for a certain period of time, data processing to be limited in its use, that is, "frozen", and the data cannot be communicated to third parties, transferred internationally, or deleted.

Data subjects have the right to obtain the limitation of data processing in the following situations:

- _ When the data subject objects to the accuracy of the data until the controller has verified the quality of the data;
- _ Where the data subject has opposed the processing of the data until it is ascertained which legitimate interests prevail;
- _ Where the data are required by the data subject for the purposes of exercising a right in legal proceedings, even if no longer needed by the controller;
- _ When data are unlawfully processed and the data subject does not wish them to be erased, but rather limited in their use (until such time as legal action can be taken against the controller).

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the data subject has the right to be informed by the controller before the restriction on processing, which he or she has requested, is lifted.

When processing is limited, the data may only be used with the consent of the data subject, for the purposes of exercising a right in a legal proceeding or defending the rights of a natural or legal person or for strong reasons of public interest.

5) Right to Data Portability: Is the right to receive from the data controller your personal data, in a structured, commonly used and machine-readable format, and the right to transmit them to another controller, only if the data processing in question is based on consent or in a contract and is carried out by automated means. It is also the right to have your data transmitted directly between the data controllers, whenever this is technically possible, but it only covers the data provided.


6) Right to Object: The data subject has the right to object, at any time, to the processing of his/her personal data, for reasons related to his/her particular situation, whenever there is a case of:

- _ A necessary treatment to the exercise of public functions or the exercise of official authority;
- _ The pursuit of the legitimate interests of the controller or third parties;
- _ A reuse of data for a purpose other than that which prompted its initial collection, including profiling.

In these cases, the controller ceases the treatment, unless he/she presents compelling and legitimate reasons that prevail over the rights and freedoms of the data subject, or for the purpose of exercising a right in a legal process.

The data subject has the right to object, at any time and without justification, to the processing of his/her data for direct marketing purposes, including the definition of associated profiles.

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7) Right to withdraw Consent: Data subjects have the right to, at any time, withdraw the consent given for the processing of his/her data, unless there is a legal basis that requires such processing.

8) Right not to be subject to a decision based solely on automated means: Data subjects have the right not to be subject to any automated individual decision, that is, taken solely on the basis of automated processing, including the definition of profiles, that produce effects in the data subjects' legal sphere or that significantly affect the data subject in a similar way. Automated individual decisions may be adopted if such decisions are necessary for the conclusion or execution of a contract between the data subject, are authorized by legislation to which Grupo Navarra is subject or are based on explicit consent.

The Navarra Group does not adopt automated individual decisions, that is, with similar legal effects or significant impacts.

9) Right to Lodge a Complaint: Data subjects also have the right to lodge a complaint with the Supervisory Authority: Comissão Nacional de Proteção de Dados – CNPD - Av. D. Carlos I, 134 - 1.º 1200-651 Lisboa; Tel: 351 213928400, Fax: +351 213976832 and e-mail geral@cnpd.pt or www.cnpd.pt.

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EXERCISE OF DATA SUBJECTS' RIGHTS

- 1) Data subjects may, at any time, exercise their rights by sending a request to the headquarters address or by sending an email;
- 2) Data subjects must be identified with accuracy and be able to prove their identity when exercising their rights;
- 3) Data subjects must keep proof that they have submitted a request to exercise their rights;
- 4) The exercise of rights is free of charge unless requests made by a data subject are manifestly unfounded or excessive, in particular due to their repetitive nature, where the data controller may demand payment of a reasonable fee to cover the administrative costs inherent to the provision of information or communication, or taking the requested measures or refusing to comply with the request.

5) Special situations:

Children - the exercise of rights in relation to children's personal data is carried out by the respective legal representatives, without prejudice to the possibility of them being able to exercise directly, given their age and maturity and situations in which the processing of data already legitimizes the consent of the child, as provided for in article 8 of the GDPR and in article 16 of Law 58/2019, of 8 August.

Deceased persons - the exercise of rights in relation to personal data of deceased subjects, when sensitive data are at stake (paragraph 1 of article 9 of the GDPR) or data relating to the intimacy of privacy, image or data relating to communications, are exercised by whoever has been designated for that purpose by the data subject or, in the absence thereof, by the respective heirs. Also, in accordance with article 17 of Law 58/2019, of 8 August, the data subject can determine the impossibility of third parties to exercise rights over his/her personal data after his/her death.

Co-responsibility - the exercise of rights in relation to the processing of personal data in which there is more than one data controller may be carried out with any of the controllers, regardless of what is agreed between the controllers.

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CHANGES TO OUR PRIVACY POLICY



Grupo Navarra reserves the right to change, modify, add or rectify this Privacy Policy at any time, without the need for any prior notice, and these changes will be publicised.

