

PRIVACY POLICY (PLATFORMS)

INTRODUCTION

The protection of privacy and personal data is a priority for INTEGRITY, S.A. - hereinafter as INTEGRITY - (PT509072054, headquartered at Avenida D. João II, nº 43, 9º Piso, Parque das Nações, 1990-084 Lisboa, Portugal), whose trading name is Devoteam Cyber Trust (the cybersecurity unit of the Devoteam Group), and a clear commitment assumed by us.

The present Privacy Policy describes in detail the terms under which Devoteam Cyber Trust treats personal data as the entity responsible for their processing, which are collected and processed in strict respect and compliance with the provisions of the personal data protection legislation in force at all times.

This policy concerns the privacy practices within the activity carried out by Devoteam Cyber Trust, namely in its platforms. The personal data you provide us during your interaction with the various services will be treated with the guarantees of security and confidentiality required by the legal framework regarding the protection of personal data.

Devoteam Cyber Trust respects the best practices in the field of security and protection of personal data, and to this end has taken the necessary technical and organisational measures in order to comply with the legislation on personal data and ensure that the processing of personal data is lawful, fair, transparent and limited to the authorised purposes.

The access and use of the services and platforms by the user assumes that the user has read, understood and accepted the Terms of this Privacy Policy.

WHAT DOES THIS POLICY COVER?

This Privacy Policy applies exclusively to the collection and processing of personal data for which INTEGRITY is responsible, within the scope of the services and products made available to its Clients/Users and in all situations in which a processing of personal data by Devoteam Cyber Trust occurs.

INTEGRITY's platforms may include links to other websites that are not part of INTEGRITY. The provision of such links is made in good faith, and Devoteam Cyber Trust cannot be held responsible for the collection and processing of personal data carried out through these websites, nor assuming any

responsibility for such websites, namely as to their accuracy, credibility and functionalities made available on them.

PRIVACY

Devoteam Cyber Trust respects your right to privacy. The data requested are intended for the provision of the service requested by you, and no personal data will be collected that is not necessary for the provision of the service or without your consent.

Interaction with Devoteam Cyber Trust 's platforms does not require user information, except when, for expressly identified purposes, registration is declared necessary and either by the user authorised according to the following terms.

DATA CONTROLLER

Devoteam Cyber Trust as Data Dontrroller:

Ensures that the processing of your personal data is carried out within the scope of the purposes for which they were collected;

Collects, uses and retains only the personal data necessary for the purpose in question;

Treats personal data for legally prescribed purposes or for the provision of services at your request.

PROCESSOR

As a Processor, Devoteam Cyber Trust undertakes to comply with privacy and personal data processing agreements entered into with the Controllers.

TERMS OF USE

Devoteam Cyber Trust treats the data of clients / collaborators/ partners and suppliers, in the context of consulting, auditing and technological consultancy services in the areas of information security,

The use of the Devoteam Cyber Trust Platforms presupposes acceptance of this Privacy Policy, which occurs when the user registers on the Platforms for the first time. Registration only takes place after consent has been given by the user.

Devoteam Cyber Trust Platforms do not store or collect personally identifiable information for the purpose of disclosure or sale to third parties for marketing purposes to consumers or sending emails on behalf of third parties.

COLLECTION OF PERSONAL DATA AND INFORMATION FROM USERS

Devoteam Cyber Trust proceeds in accordance with the personal data protection legislation in force.

➤ CATEGORIES OF DATA HANDLED BY DEVOTEAM CYBER TRUST (NON-EXHAUSTIVE INVENTORY):

- Identification and Contacts – Name and email.
- Security Data - Authentication information on sites and Platforms (user identifier, password, access logs).

➤ COLLECTION AND PURPOSES OF PERSONAL DATA COLLECTED (EXAMPLES - NOT EXHAUSTIVE):

- Platform Access - Data collection to enable the management, control and security of users to the platform.

For those cases where it seems necessary and/or mandatory, INTEGRITY requests your express consent before using the information for purposes other than those expressly provided in this Privacy Policy.

➤ BASIS OF LAWSUIT

Data processing by Devoteam Cyber Trust, in the context of this Policy, is only carried out when at least one of the following situations occurs:

- If the data subject has given their consent to the processing of their personal data for the purpose described above;
- Processing is necessary for the execution of a contract to which the data subject is party (service contracts provided by Devoteam Cyber Trust to Customers).

➤ CONSERVATION PERIOD

Devoteam Cyber Trust keeps the personal data according to the purpose of its collection:

- During the period in which the institutional and/or service relationship is maintained with the holder of the data and/or with the entity with which the holder collaborates;

- Up to a maximum of 3 months after the end of the service, and/or in accordance with contractual conditions with the respective client, in order to ensure the portability of the information or to respond to any investigation request;
- In accordance with the legislation that regulates the process;
- In accounting and fiscal cases for the entity with which the holder collaborates, according to the legislation in force;
- For another period as long as agreed and with the consent of the holder.

➤ RETURN AND ELIMINATION OF PERSONAL DATA

At the request Devoteam Cyber Trust shall:

- a. Destroy or return all information/ documents/material containing personal data;
- b. Erase all the personal data Information from its computer systems or which is stored in electronic form (to the extent possible); and
- c. Certify in writing that it has complied with the requirements of this clause, provided that a Devoteam Cyber Trust Party may retain documents and materials containing personal data, reflecting, incorporating or based on the PII Information to the extent required by law or any applicable governmental or regulatory authority and to the extent reasonable to permit Devoteam Cyber Trust to keep evidence that it has performed its obligations under the Agreement.

➤ PERSONAL DATA SHARING

Devoteam Cyber Trust may only share personal data with third parties, complying with the legal and/or contractual provisions and obligations in force according to the cases, including but not limited to:

- Regulatory authorities, courts and/or official bodies.

➤ PROTECTION OF PERSONAL

Devoteam Cyber Trust owns and uses the best recommended practices to protect personal data in accordance with the applicable data protection laws.

RIGHTS OF DATA HOLDERS

The user has the right to access, update, rectify, delete, limit and oppose the processing of their data, as well as the right to request their portability, through a request sent to Devoteam Cyber Trust to the contacts described in "Final considerations".

In cases where the data processing is based on the consent of the data subject, the data subject may withdraw it, without prejudice, however, to the validity of the processing until that date.

Without prejudice to any other means of administrative or judicial appeal, the data subject may lodge a complaint with the competent supervisory authority, namely, the National Data Protection Commission (www.cnpd.pt), under the law.

CHANGES TO PRIVACY POLICY

Devoteam Cyber Trust reserves the right to change its Privacy Policy, therefore we advise you to regularly consult this document.

The changes are deemed to come into force from the date of their publication in this site, making express reference to the date of update.

Transfer of Personal Data

As a rule, Devoteam Cyber Trust does not transfer personal data outside the European Union. However, if there is a need to transfer personal data outside the European Union, Integrity ensures a level of protection analogous to the protection determined by legislation in force in the European space, namely that provided for in the GDPR.

In the context of international data transfers, Devoteam Cyber Trust will adopt one of the following procedures:

1. Conclusion of an individual contract or standard contractual clauses adopted directly by the European Commission or by a supervisory authority;
2. Participation of the subcontractor in a certification system or standard accredited or recognized by the EU to guarantee an adequate level of protection;
3. Recognition that the subcontractor's binding corporate rules guarantee an adequate level of data protection, issued by the supervisory authorities;
4. Existence of an adequacy decision relating to the third country, territory or specific sector of that third country, or relating to the international organization in question.

Regarding point 4., it should be noted that, to date, the European Commission has recognized a number of countries that ensure adequate protection (Andorra, Argentina, Canada – Commercial Organizations, Faroe Islands, Guernsey, Israel, Isle of Ma, Japan, New Zealand, Jersey, Republic of Coreia, Switzerland, United Kingdom, United States – Commercial organizations participating in the Data Privacy Framework EU-USA, Uruguay).

FINAL CONSIDERATIONS

Any aspects related to the processing of personal data, the exercise of the rights of the holders of personal data, or any other questions about this Policy, should be directed to the following contacts:

INTEGRITY, S.A.

Avenida D. João II, n° 43, 9° Piso, Parque das Nações
1990-084 Lisboa - Portugal

Or

E-mail: privacy@integrity.pt

DATE OF LAST UPDATE

November 26th, 2025