

P-003CA | Personal_Data_Protection_and_Privacy_Policy - Employees

Personal Data Protection and Privacy Policy - Employees

Floene Energias, SA (hereinafter “Floene”) and the companies of the Floene Group, process the personal data of all its workers, jobseekers, interns or trainees, temporary workers, members of corporate bodies, legal representatives or any other third parties with whom you have a contractual employment relationship (hereinafter “Employees”) for various purposes.

This Personal Data Protection and Privacy Policy provides detailed information on how Floene, and the companies of the Floene Group, treat the personal data of its Employees in accordance with the applicable legislation on the protection of personal data and privacy. This Data Protection and Privacy Policy is not an integral part of the employment contract.

1. Who is responsible for the processing of your personal data?

The Floene company, or the companies of the Floene Group, with whom you signed your employment contract is responsible for the processing of your personal data.

2. What personal data is processed?

The Floene company, and the companies of the Floene Group, can process various categories of personal data, namely:

Personally Identifiable Information	As full name, age, height, weight, sex, date of birth, address, nationality, place of birth, language, identification document, photo, SSIN, TIN, signature, social security level, marital status, name and TIN of the household member, number of dependents, driving license, date of death, geographic location, video footage, military status, residence visa, marriage certificate, proof of address
Data related to the professional situation	As an employer, mechanographic number, professional category, function, functional group, organizational unit, professional situation, workplace, department / area, start date of employment, date of beginning of employment, date of restart of employment, date suspension of employment, date of termination of employment, reason for leaving, seniority, working hours, duration of work, date / time of entry / exit, attendance and absenteeism, user company, type of contract, duration of contract, professional aptitude certificate number, spouse's employer statement, last promotion date, committee member, union number, union name, disciplinary sanctions, performance evaluation, performance certificate for the previous school year, criminal record



Recruitment data	As application date, interview results, admission test / proof results, curriculum vitae, qualification certificate
Training data	As training name, training area, training initiative, training period, training duration, training schedule, training qualification level, training assessment, literacy skills, skills, professional qualification
Financial situation data	Such as income and remuneration, financial contributions and social security, regular financial commitments, pensions, premiums, liens, expenses, subsidies, tariff, amount owed, date of default, date of end of default, number of arrears, number of days in arrears, number of income holders, declaration of benefits, registration receipt and tuition fees, pledged assets, bankruptcy / insolvency, quality assessment reports, risk class, credit risk, return of checks, shareholder position
Data on payment methods and transactions	Such as account number, IBAN, transaction number, transaction description, transaction date, transaction amount, number of transactions, card number, card name, card activation date, card expiration date, CCV , BIN code, check number, electronic invoicing, invoice number, SEPA mandate
Health data	Such as the doctor's professional ID number, disability indicator, type / degree of disability, special needs, type of exam, exam date, exam results, alcohol and drug test results, medical discharge date, number of days of discharge, medical fitness record, fitness record recommendations, medical report, disability certificate
Contact details	Such as phone / cell phone number, internal extension, fax number, e-mail address, IM address, date / time of contact, place of origin of the contact, preferential contact, contact person, emergency contact, IMEI
Vehicle data	As registration, registration date, vehicle brand, vehicle model, chassis number, chassis number, Via Verde movements, Via Verde identifier reference, parking space
Data arising from legal proceedings	Such as lawsuits, number of the lawsuit, litigation process, type of proceeding, outcome of the proceeding, amount petitioned, criminal offenses and claims, identification of the last due diligence, date of the last due diligence, preferred credits, attachment of credits
Data arising from complaints	Such as claim number, claim date, claim description, claim origin, claim reply date



Insurance-related data	Like type of insurance, insurance policy number, insurance start date, insurance validity, insurer, insurance receipt date, life insurance - number of months of covered salary, life insurance covered monthly salary, insurance premium, claim date, claim reporting date, description of occurrence, claim number, compensation amount, accident location, green card number
Authentication and access data	As user account, username, password, date of creation, validity of access, registration of entries and exits
Web browsing data	As electronic identifier (Mac, IP), date / time of connection start, date / time of connection end, place of origin of web browsing, URL visited, website, host name
Data from satisfaction surveys	As satisfaction index, preference factors, opinion, areas of interest

3. How does the Floene company, and the companies of the Floene Group collect your personal data?

The Floene company, and the companies of the Floene Group, collect your personal data mainly through direct collection, that is, from information provided directly by you. Your personal data can also be obtained from other employees, their superiors, the Personnel Department or third parties (e.g. references from a previous employer, tax information from the tax administration or social security contribution information or court notices). In certain circumstances, your personal data may also be collected indirectly via monitoring devices (e.g. through video surveillance systems), within the limits permitted by applicable law.

4. What are the purposes and legal grounds for the processing of your personal data?

Your personal data are processed for the purposes of human resource management and security of people and property, the main processing activities being identified in the table below:

Treatment activities			
Recruitment and selection	Human resource Management		Processing of wages and benefits
Time / attendance control	Training	Occupational Health and Safety	Insurance management
Retirement / preretirement	Management of disciplinary sanctions	Administrative management	Financial management



Economic and accounting management			Litigation management	
Opinion Surveys	Profile definition and analysis	Audits	Logic access control	
Physical access control	Management of websites and applications		Video surveillance	
Device monitoring	Traffic data management		Access credential management	
Cookie Management	Sending notifications and alerts	Contract management	Events organization and management	
Hobbies and contests	Management and maintenance of information systems and technologies		Whistleblowing	

In any activity, the processing of personal data is legitimized by one of the following grounds of lawfulness:

- Execution of the contract to which the Employee is a party or the pre-contractual steps necessary to affect his hiring;
 - Legitimate interest pursued by the Floene company, by the companies of the Floene Group or by a third party unless the interests or fundamental rights and freedoms of the Employee that requires the protection of their personal data prevail;
 - Compliance with a legal obligation to which the company Floene Energias, SA and the companies of the Floene Group are attached;
 - Employee Consent, in exceptional cases, provided that the act of giving or refusing consent does not have any negative consequences for you;
 - Defending the Employee's vital interests, if he is physically or legally unable to give his consent;
- Exercising public interest functions or exercising public authority in which the Floene company and the companies of the Floene Group are invested.

5. What is the period of retention of my personal data?



Your personal data will be kept for the entire duration of your contract with the company responsible for processing the data.

To the referred conservation period can be added any other period resulting from the fulfillment of a legal obligation applicable to the Floene company, or to the companies of the Floene Group (and for the period defined therein), after the end of the employment contract or, in the case of a procedure administrative or judicial, up to 6 months after the final judgment of the respective sentence.

For certain purposes, the retention period may also be shorter, with personal data, in that case, kept as long as necessary for the purpose for which it was collected.

6. Who are the recipients of my personal data?

If there is a legitimate interest in intra-group data sharing, your personal data may be transmitted, for internal administrative purposes, to other companies in the Floene Group.

Your personal data may also be provided to companies contracted to provide services to the Floene company, or to the companies of the Floene Group. These companies (subcontractors), linked to Floene by written contract, can only process your personal data for the purposes specifically established and are not authorized to process it, directly or indirectly, for any other purpose, for their own benefit or that of a third party.

Your personal data can also be shared with entities with whom Floene, or companies of the Floene Group, establish partnerships, under joint liability agreements.

In compliance with legal and / or contractual obligations, your personal data may be transmitted to third parties, in order to pursue their own purposes, namely to banks and insurance companies, judicial, administrative, supervisory or regulatory authorities and even entities that carry out actions, lawfully. compilation of data, actions to prevent and combat fraud or statistical studies. Floene Energias, SA and the companies of the Floene Group may also transfer their personal data outside the European Economic Area, if justified in the context of the execution of a contract or in compliance with a legal obligation, ensuring that the data are only transferred under a European Commission suitability decision or standard data protection (or similar) clauses approved by the European Commission.

7. How will my personal data be treated?

Your personal data is processed by Floene Energias, SA or by the companies of the Floene Group, in the context of the purposes indicated above and within the limits defined in the Labor Code, in accordance with the Group's internal policy and standards and using technical measures and appropriate organizational measures to promote the respective security and confidentiality, namely in relation to the unauthorized or unlawful treatment of your personal data and the respective loss, destruction or accidental damage. Your data can also be further processed for statistical purposes.



Image data may be used, if not opposed, in unrevised, revised or edited format, in the Floene press database, or in the Floene Group, for informational and non-commercial purposes and also in Floene accounts, or of Floene Group created on social networks.

8. What rights do I have over my personal data?

As a data subject, you have the right, whenever applicable: i) to request access, rectification, limitation, opposition, portability and erasure of your personal data, (ii) file a complaint with the competent supervisory authority or (iii) obtain reparation and / or compensation, if it considers that the treatment carried out violates your rights and / or the applicable personal data and privacy legislation.

You can exercise your rights enshrined in the applicable legislation on personal data and privacy by emailing data.privacy@floene.pt or by internal mail, to the attention of the Floene Ethics Committee.

You can also contact the Floene data protection officer for any questions related to the protection and privacy of your personal data by emailing DPO@floene.pt.

9. Other privacy notices

Without prejudice to the information contained in this document, Floene, and the companies of the Floene Group, may process other personal data or additional data categories, when necessary for the pursuit of a certain purpose and in accordance with the applicable legislation, and you will be notified in advance of such personal data processing.

10. Changes to the Personal Data Protection and Privacy Policy

Floene, and the companies of the Floene Group may, at any time, change this Personal Data Protection and Privacy Policy in accordance with new legal or regulatory requirements or proceed with the respective update, if justified. We advise you to consult this Policy regularly to check for the most up to-date versions.

Last updated date: October 24th, 2022