

Created: *[Signature]* RESP. QAS

 Approved: *[Signature]*
**RESUMO:**

REBONAVE has already implemented the new General Regulation on Data Protection (RGPD), thus complying with the legislation on protection of personal data in force.

This document defines REBONAVE's Data Protection Policy, available to all our stakeholders, through the company's website.

**INDEX**

|  |   |
|--|---|
| 1. OBJECTIVE AND SCOPE .....                       | 1 |
| 2. DEFINITION OF PERSONAL DATA .....               | 1 |
| 3. RESPONSIBLE FOR THE PROCESSING OF DATA .....    | 1 |
| 4. PERSONAL DATA AND ITS TREATMENT .....           | 1 |
| 5. PURPOSE OF THE DATA PROCESSING .....            | 2 |
| 6. CIRCULATION OF DATA .....                       | 2 |
| 7. ACCESS, RETIFICATION AND DISPOSAL OF DATA ..... | 2 |
| 8. SAFETY OF DATA .....                            | 2 |
| 9. UPDATES .....                                   | 2 |

**1. PURPOSE AND SCOPE**

The purpose of this document is to establish and maintain a certain level of data protection that:

- Be in compliance with applicable legal provisions on data protection;
- Be in line with the needs of customers, partners and employees;
- Enable effective business processes;
- Allow REBONAVE to maintain a positive external image in the market.

**2. DEFINITION OF PERSONAL DATA**

Personal data shall mean all information of any kind and regardless of the medium in which it is stored, relating to personal characteristics or material circumstances of a natural or identifiable person (the data subject), including, but not limited to, the address, policy number, actuarial information, claims, profession and other details such as health status, income or financial position.

**3. RESPONSIBLE FOR DATA PROCESSING**

REBONAVE-Towage and Maritime Assistance, headquartered at Ladeira da Ponte de São Sebastião, number three, in Setúbal, corporate entity 502134259, is responsible for the processing of your personal data, committing to process them with total transparency and respect for the reservation of their private life, as well as for their fundamental rights, freedoms and guarantees, ensuring full compliance with the Law on Protection of Personal Data (Law no. 67/98, of October 26).

**4. PERSONAL DATA AND ITS TREATMENT**

REBONAVE does not collect any personal data about you unless you voluntarily choose to provide your data by completing the various records or contact forms available.

By submitting your data to REBONAVE, either by registering or by contacting, you are expressing your authorization regarding the processing of your personal data under the terms set forth in this "Privacy Policy".

The data provided will be treated by REBONAVE in accordance with the legally applicable precepts, namely:

- Licitly treated;
- Collected for a specific purpose, explicit and legitimate, and cannot be treated for other purposes;
- Accurate and up-to-date;
- Preserved in a way that allows the identification of their holders only during the necessary period (2 years for mailing purposes). After the stipulated period, the data will be erased or, alternatively, made anonymous.

## **5. PURPOSE OF THE DATA PROCESSING**

The personal data that REBONAVE collects about you will be used for the following purposes:

- Provide you with information regarding products, services or events, directly or indirectly related to the organization;
- Develop marketing actions;
- Conduct customer satisfaction surveys;
- Data processing of employees in the context of the employment contract;
- Any other additional objective directly related to the original purpose for which they were originally collected.

## **6. CIRCULATION OF DATA**

REBONAVE undertakes not to transmit to any third party the personal data collected about you, except in the following circumstances:

- Transmission of the necessary elements for the delivery of services to the transport companies, when necessary;
- Request by the administrative or judicial authorities;
- Danger or consummation of fraud or other illegal activities, such as attacks on REBONAVE's technology and information systems.

## **7. DATA ACCESS, RECTIFICATION AND ELIMINATION**

You are entitled to obtain, freely and without restrictions, the right to access, rectify, update or delete your personal data, by written request through the email [qas.rebonave@rebonave.pt](mailto:qas.rebonave@rebonave.pt).

## **8. DATA SECURITY**

REBONAVE uses standard security measures to prevent your personal data from being viewed or used by unauthorized third parties. Except in case of fraud or gross negligence, REBONAVE shall not be liable for any damages it may suffer due to any loss, unauthorized access, misuse or alteration of the data collected, attributable to the unauthorized or fraudulent conduct of third parties.

## **9. UPDATES**

REBONAVE may, at any time, update or change the information in this "Privacy Policy", so it is recommended that it be viewed periodically.

For any additional clarification, REBONAVE can be counted through the telephone 265 530 040 or by e-mail [qas.rebonave@rebonave.pt](mailto:qas.rebonave@rebonave.pt)