

DATA PROTECTION AND PRIVACY POLICY

GALP ENERGIA, SGPS, S.A., together with the companies of the Galp Group, ("GALP") respect your privacy and value the relationship they have with you. This Data Protection and Privacy Policy aims to inform you about the way GALP processes your Personal Data and ensures your privacy in the development and carrying out of its activities, namely:

- Controller of your Personal Data
- Principles applicable to the protection of your Personal Data
- Personal Data, Processing of Personal Data and Data Subjects
- Category of Personal Data that GALP processes
- Purposes of the processing of your Personal Data
- Lawful Bases
- Storage period of your Personal Data
- Sharing of your Personal Data
- International Flows of Personal Data
- Your rights and how you can exercise them
- The Data Protection Officer
- Security of your Personal Data
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1) Controller of your Personal Data

The Controller of your Personal Data is the company of the GALP Group which, individually or in conjunction with the other GALP Group companies, provides services and/or supplies products to you, determining to this end, without limitation:

- The Personal Data that have to be processed in the context of providing services and/or supplying products;
- The Purposes for which the Personal Data are processed; and,
- The means to be used for the processing of the Personal Data.

2) The Principles applicable to the protection of your Personal Data

The Processing of your Personal Data is carried out according to the general principles enunciated in the General Data Protection Regulation ("GDPR"), namely:

- In the context of the relationship established, GALP guarantees that your Personal Data will be processed lawfully, fairly and transparently ("Principle of lawfulness, fairness and transparency");
- GALP collects your Personal Data for certain explicit and legitimate purposes and does not subsequently process the same Data in a way incompatible with those purposes ("Principle of purpose limitation");
- GALP ensures that only Personal Data are processed that are appropriate, relevant and limited to what is strictly necessary for the purposes for which they are processed. ("Principle of data minimisation");
- GALP takes appropriate measures so that inaccurate Personal Data, bearing in mind the purposes for which they are processed, are deleted or rectified without delay ("Principle of accuracy");
- GALP stores Personal Data in such a way that it allows them to be identified only during the period necessary for the purposes for which they are being processed. ("Storage limitation principle");
- GALP ensures that your Personal Data are processed in a way that ensures their security, including protection against unauthorised or unlawful processing and against loss, destruction or accidental damage, adopting all appropriate technical and organisational measures to that end ("Principle of integrity and confidentiality").

3) Personal Data, Processing of Personal Data and Data Subjects

"Personal Data" are all information and/or elements that, regardless of how they are stored, can identify you or make you identifiable, directly or indirectly, to GALP, in particular by reference to an identifier, for example a name, an identification number, your location data and/or online identifiers, or to one or more specific elements of your physical, physiological, genetic, mental, economic, cultural or social identity.

"Personal Data Processing" means the operation or set of operations performed on the Personal Data of Data Subjects, via automated or non-automated means, from the gathering of information until its destruction. Within this cycle, among others, are included: recording, organisation, structuring, storage, adaptation or alteration, recovery, consultation, use, disclosure via transmission, dissemination or otherwise making available, comparison or interconnection, limitation, deletion. The concept of Personal Data Processing is quite broad and shall be applicable to all operations or sets of operations performed by GALP with reference to your Personal Data.

In the context of the activities carried out by GALP, the "Data Subject" is, without limitation, the customer and/or former customers, potential customers, investors, partners, candidates for a job, employees and ex-employees, employees of partners, suppliers and contractors and their employees, applicants and claimants, visitors and individuals captured in CCTV images and all those individual people that have a relationship with GALP and who are the subjects of the Personal Data.

4) Category of Personal Data that GALP processes

In the carrying out of its activities, GALP processes Personal Data from a significant set of categories of Data Subjects.

The personal data collected by GALP always depends upon the nature of the interaction, but may include the following:

Category of Personal Data	Personal Data (📌 list of examples)
Identification and contact data 📌	📌 Name, surname, citizen card number, postal address, landline or mobile phone number, fax number, email address and/or other similar contact information.
Demographic data 📌	📌 Country, gender, age and date of birth, language, general education and professional history, as well as data of general interest about work.
Business data for providing GALP services and/or products 📌	📌 Counter reader, universal installation code (CUI, Código Universal de Instalações) and delivery point code (CPE, Código de Ponto de Entrega), data indicated on the invoice, consumption data, payment data, vehicle data, especially the licence plate number and product model, data arising out of information in the context of response to any questions, requests or complaints, data resulting from the collection of opinions, evaluations of GALP services and/or data associated with information about the subject's preferences and interests, to the extent that they are related to the products and/or services provided by GALP.
Payment Data 📌	📌 Tax identification number, credit and/or debit card numbers, security code numbers, payment dates, amounts of debt or payments received and/or other related billing information.
Account Data 📌	📌 Method of acquisition of or subscription to products and/or services, their transactions, billing history and customer loyalty, within the

	context of the GALP services that they use or any other related information.
Data on preferences ⓘ	ⓘ Information on the preferences and interests of subjects, insofar as this is related to products and/or services, and on the method via which the subject prefers to receive information.
Data from social networks ⓘ	ⓘ Information shared on social networks in the interaction with GALP, where transparency is ensured through the existence of appropriate privacy policies.
Identification and contact data in control of accesses and/or capturing and recording of images by CCTV devices	Data associated with access such as time of entry and exit, location, person to contact, reason for visit and/or data regarding the vehicle and images captured by the video surveillance system.
Location Data ⓘ	ⓘ Data from the Global Positioning System (GPS) when the user allows services based on location and/or when they opt to provide information related to location during the registration of a product and/or service.
Security credentials data ⓘ	ⓘ User ID, passwords, answers to password recovery questions and/or other similar security information needed to authenticate and access GALP accounts and services.
IT usage data ⓘ	ⓘ User ID, functions, rights, session start and finish times, computer name and/or IP address and/or traffic data and content of calls made.
<i>Cookies</i>	ⓘ Information gathered when we use <i>cookies</i> , <i>web beacons</i> , <i>pixels</i> and/or other technologies, including, but not limited to, for advertising purposes.

We stress that you will not be required to share your Personal Data with GALP. Nevertheless, if you choose not to share your personal information, in some cases GALP may not be able to provide the desired services or supply the desired products, guarantee certain specialised features and/or respond effectively to certain questions that you may have.

5) Purposes of the processing of your Personal Data

The development and performance of various activities pursued by GALP means the existence of a significant set of specific, explicit and legitimate purposes for the processing of your Personal Data, such as:

Purposes	Purposes of Processing (ⓘ non-exhaustive list)
Accounting, Tax and Administrative Management	Customer Management Vendor Management Administrative Management Economic and Accounting Management
Commercial and Marketing Activity	Contacts Management Customer Management for providing GALP services and/or products Customer support Marketing Online advertising Opinion surveys and polls Customer loyalty
Definition and Analysis of Profiles	Definition of profiles Dynamic analysis of profiles Development of predictive models Improvement and innovation in GALP services and products Research and analysis of analytical information
Call Recording	Proof of contractual relationship Monitoring the quality of service Emergency
Capture and Recording of Images via CCTV Devices	Video-surveillance for the security of people and goods

Access Control Management	Access control for the protection of people and goods
Human Resources Management	Selection of personnel and recruitment
Electronic Communications Management	Management of use of <i>websites</i> and mobile applications Storing of traffic/location data
Scientific research or analysis of statistical information	Improvement and innovation in GALP services and products
Litigation Management	Collections management and credit recovery Providing information to judicial, administrative, supervisory and/or regulatory authorities
Compliance with Contractual and/or Legal Obligations	Transferring Data to Third Parties Prevention of fraud and security

6) Lawful Bases

Regarding the “Lawfulness Principle” enshrined in current and future data protection laws, in developing and performing its activities, GALP only processes your Personal Data when there is a lawful basis that legitimises the processing, namely:

Lawful Bases	What do they consist of?
Consent ⓘ	ⓘ GALP will only process your Personal Data if you consent to the respective Processing via a free, specific, informed and explicit declaration of willingness, by which you accept, by a declaration (in writing or orally) or a positive unambiguous act (by filling in an option), that your Personal Data may be the subject of Processing.
Pre-contractual procedures or the execution of a contract ⓘ	ⓘ GALP may process your Personal Data if they are needed, without limitation, for the execution of a contract to provide services and/or supply products to

	which it is a party as Contractor, Client, Supplier and/or partner, or in order to carry out pre-contractual procedures for your order.
Compliance with a legal obligation ⓘ	ⓘ GALP may process your Personal Data to ensure and guarantee compliance with legal obligations to which it is subject by the laws of a Member State and/or the European Union.
Defence of vital interests of the Data Subject ⓘ	ⓘ GALP may process your Personal Data to ensure the defence of your vital interests, especially when such Processing is essential to your life.
Legitimate Interests ⓘ	ⓘ GALP, other Controllers or Third Parties, may process your Personal Data provided that this Processing does not prevail over your interests and fundamental rights and freedoms.

7) Storage period of your Personal Data

GALP stores your Personal Data only for the period of time necessary to execute the specific purposes for which they were collected. However, GALP may be obliged to store some Personal Data for a longer period, taking into consideration factors such as:

- Legal obligations, under the laws in place, to store Personal Data for a given period;
- Contractual obligations and/or legitimate interest of GALP;
- Terms of prescription, under the laws in place;
- (possible) Disputes; and,
- Guidelines issued by the competent data protection authorities.

During the Processing period of your Personal Data, GALP ensures that they are treated in accordance with this Data Protection and Privacy Policy. As soon as your Data are no longer needed, GALP will delete them securely.

8) Sharing of your Personal Data

Entities with whom GALP shares your Personal Data

Processors ⓘ

Why we share your Personal Data

ⓘ Your Personal Data may be shared with companies hired to provide services to GALP.

Companies hired to provide services are bound to GALP by written agreement, and may only process your Personal Data for the purposes specifically established and are not authorised to process your Personal Data, directly or indirectly, for any other purpose, for their own advantage or that of third parties.

ⓘ Your Personal Data may be shared internally with other GALP Group companies, via an intra-group data-sharing agreement, which will comply with applicable data protection rules depending on the purposes attached to the Processing that is carried out.

Other Controllers and/or Third Parties ⓘ

At your request and/or with your consent, your Personal Data may be shared with other entities.

In compliance with legal and/or contractual obligations, Personal Data may also be transmitted to judicial, administrative, regulatory or supervisory authorities, to energy distribution network operators, to third parties with whom GALP establishes partnerships and also to entities that perform,

lawfully, data-gathering activities, actions to prevent and combat fraud, statistical or market studies.

9) International Flows of Personal Data

GALP may transfer your Personal Data outside the European Economic Area (“EEA”), to locations that may not guarantee the same level of protection.

However, GALP only transfers your Personal Data outside the EEA:

- Through binding rules applicable to GALP companies (*binding corporate rules*);
- When the transfer is made to a location or through a method or in circumstances that the European Commission regards as ensuring adequate protection of your Personal Data;
- When it has implemented data protection clauses similar to those adopted by the European Commission or by a competent data protection authority; or,
- When none of the above apply, but, even so, the law authorises this transfer, for example, if it is required for the declaration, exercise or defence of a right in a lawsuit.

You may request detailed information about security measures that GALP has implemented regarding transfers of Personal Data outside the EEA and, when applicable, a copy of the data protection clauses in force at the GALP Group via the email dpo@galp.com.

10) Your rights and how you can exercise them

As a Subject of Personal Data processed by GALP, you have the right to access, rectification, limitation, portability, deletion and the right to object to the Personal Data Processing, in certain circumstances, which may be exercised under the terms of this chapter of the Data Protection and Privacy Policy.

Rights	What do they consist of?
Right to the provision of information ⓘ	<p>ⓘ You have the right to obtain clear, transparent and easily understandable information about how GALP uses your Personal Data and what your rights are. That is why GALP provides you with all this information in this Data Protection and Privacy Policy.</p>
Right of access ⓘ	<p>ⓘ You have the right to obtain information about the Personal Data that GALP processes (if it is processing them) and certain information (similar to that provided in this Privacy Policy) about how these Data are processed. This right allows you to know and confirm that we are using your Data in compliance with data protection laws.</p> <p>GALP may refuse to supply the requested information whenever, in order to do so, GALP has to reveal Personal Data from another person or the information will have a negative impact on the rights of another person.</p>
Right to rectification ⓘ	<p>ⓘ If your Data are incorrect or incomplete (for example, if your name or address is wrong), you may ask GALP to take reasonable measures to correct them.</p>
Right to deletion of data ⓘ	<p>ⓘ This right is also known as the “right to be forgotten” and, so put simply, it allows you to request the deletion or elimination of your data, provided that there are no valid grounds for GALP to continue to use them or their use is illegal. This is not a generic right to deletion, because exceptions are allowed (for example, whenever these data are required for the defence of a right in a judicial process).</p>
Right to restriction of processing ⓘ	<p>ⓘ You have the right to “block” or prevent future use of your Data while GALP evaluates a rectification request or as an alternative to deletion. Provided that the Processing is limited, GALP continues to be able to store your data, but it cannot use them later. GALP keeps a list of subjects who have requested the “blocking” of future use of their data to ensure that this limitation is respected.</p>
Right to data portability ⓘ	<p>ⓘ You have the right to obtain and reuse certain Personal Data for your own purposes in various organisations. This right applies only to your own Data that you have provided to GALP and that GALP processes with your consent and which are processed by automated means.</p>

Right to opposition ⓘ

ⓘ You have the right to object to certain types of processing, for reasons related to your particular situation, at any time during which this Processing takes place, for the purposes of GALP's or Third Parties' legitimate interests. GALP may continue to process these Data if it can prove "overwhelming legitimate reasons for Processing that prevail over your interests, rights and freedoms" or if these Data are necessary for the establishment, exercise or defence of a right in a lawsuit.

Right to submit a complaint ⓘ

ⓘ You are entitled to submit a complaint to the competent supervisory authority, namely, the National Data Protection Commission (CNPD, Comissão Nacional de Protecção de Dados), whenever you believe that the processing of your personal data violates your rights and/or the applicable data protection laws.

You may at any time, in writing, exercise the rights enshrined in the Law on the Protection of Personal Data and other applicable legislation, via the email data.privacy@galp.com.

11) The Data Protection Officer

GALP has appointed a Data Protection Officer, who assumes a critical role within GALP in monitoring processing activities of data carried out and in ensuring their respective legal compliance.

The Data Protection Officer has the following functions:

- a) Controlling compliance of the processing performed by GALP with the provisions of current data protection laws and those connected with the issue of personal data protection in the various Member States and/or in the Union;
- b) Providing advice to GALP;
- c) Cooperating with the Control Authorities of the respective European Union Member States (in Portugal, the CNPD "Comissão Nacional de Protecção de Dados" [National Data Protection Commission]); and,
- d) Establishing a point of contact with the Control Authorities and with the respective data subjects about any issues related to data protection matters.

You may at any time, in writing, contact GALP's data protection officer for any questions related to the protection of data and your privacy via the email dpo@galp.com.

12) Security of your Personal Data

Your Personal Data will be processed by GALP, within the context of the purposes identified in this Policy, according to the GALP Group's internal policy and standards, and with the assistance of appropriate technical and organisational measures to promote their security and integrity, notably in relation to unauthorised or unlawful processing of your personal data and their loss, destruction or accidental damage.

Without limitation, GALP uses logical and physical security requirements and measures to ensure the protection of your Personal Data by preventing unauthorised access, it ensures that the storage of the information is carried out on secure computers in a closed and certified information centre, and that the Data are encrypted whenever possible, it implements audit and control procedures to ensure compliance with the security and privacy policies and, periodically, it reviews security policies and procedures to ensure that GALP's systems are secure and protected.

However, given that the transmission of information via the internet is not completely secure, GALP cannot guarantee the security of your Data when transmitted on an open network.

13) Confidentiality

GALP recognises that the information you provide may be confidential. GALP does not sell, rent, distribute Personal Data, or make them available commercially or in any other way to any third-party entity, except in cases where it needs to share information for the purposes set forth in this Data Protection and Privacy. GALP maintains the confidentiality and integrity of your Personal Data and protects them in compliance with this Data Protection Privacy Policy and all applicable laws.

14) Cookies

GALP uses *cookies* to collect information about the use of the *website*. Whenever you use the *website*, GALP processes your Personal Data collected via the use of *cookies* in compliance with our *cookies policy*. For more information about the use of *cookies*, we advise you to read and review the *Cookies Policy* and to check it regularly to find the most up-to-date versions.

15) Other GALP Privacy and Data Protection Policies

This Data Protection and Privacy Policy does not impair the applicability of data protection and privacy policies of GALP's own *websites*, which should be consulted.

16) Alterations to this Data Protection and Privacy Policy

GALP may periodically alter this Data Protection and Privacy Policy. When it does so, it will publish the updated Data Protection and Privacy Policy, and you are therefore advised to check it regularly. GALP stresses that it shall only use Personal Data in the terms described in the Data Protection and Privacy Policy current at the time the information was collected or authorised by you.

Without prejudice to applicable law, all alterations will take effect as soon as the Updated Policy is published but, whenever GALP has already collected Personal Data about you and/or whenever required by law, GALP may take additional measures to inform you about any material alterations and may ask you to agree to these alterations.