

Privacy & Data Protection Policy

This Privacy and Data Protection Policy regulates the processing of personal data and aims to ensure compliance with Regulation (EU) 2016/679, of the European Parliament and of the Council (General Data Protection Regulation – GDPR), in force since May 25, 2018. The aforementioned legal framework also includes Law No. 58/2019, of August 8, which ensures, at national level, the implementation of the GDPR.

In order to continue to develop and improve our service provision, we believe that the Protection of your Data is essential in the development and performance of our activities. To do this, the following information will be essential:

- Responsible for the Processing of your Personal Data;
- The Data Protection Officer;
- Information we collect;
- How we use the information we collect;
- Legitimate interest;
- How we treat and protect personal information;
- How long we keep the information we collect;
- Information we share;
- Data transfer;
- Your rights and choices;
- Updates to our Privacy Policy;
- How to contact us.

In this privacy policy, we describe the types of personal data or personal information we collect, how we use it, how we treat and protect the information we collect, for what purpose and for how long we store it, who we share it with, who we share it with, we transfer and the rights that individuals can exercise in relation to the use of their personal data. We also describe how you can contact us and exercise your rights.

Responsible for the Processing of your Personal Data:

Our privacy policy provides a framework for the processing of personal data collected by Promarinha, SA, with headquarters at Rua da Ribeira Nova, nº46, 1º Esq, 1200-376 Lisboa, NIPC 500874905 referred to as the Data Controller. This privacy policy applies to candidates, employees, crew members and other human resources, suppliers and customers.

The Data Protection Officer:

Promarinha appointed a Personal Data Protection Officer, who assumes a fundamental role in organizing and monitoring the Data Processing activities carried out and ensuring their respective legal compliance.

The Data Protection Officer has the following functions:

- Control the compliance of the treatments carried out by Promarinha, with the Data Protection laws in force in the various Member States and/or the Union;

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Approved:



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- Provide advice to Promarinha within the scope of personal data processing activities;
- Cooperate with the Control Authorities of the respective Member States of the European Union (in Portugal the CNPD - National Data Protection Commission);
- Establish a point of contact with the Control Authorities and their respective Data Subjects, on any issues related to Data Protection matters.

You may at any time, in writing, contact Promarinha's Data Protection Officer, for any questions related to Data Protection and your Privacy via the email address pedro.martins@promarinha.pt

Information We Collect:

We may collect personal data in various ways, for example, through our website and social media; at our events; via telephone and email; through in-person applications; or in interactions with customers and suppliers. Depending on the nature of the relationship, we may collect a range of personal data, namely (in accordance with the Law):

- Contact information (such as name, postal address, email address and telephone number);
- Username and password, when registering on our sites.
- Information you give us about friends or other people you would like us to contact. (The Data Controller assumes that the other person has already given their prior consent to such communication);
- References you provide to us about job candidates, with whom you work or have worked;
- Other information you may provide to us, for example through surveys, or
- Through the "Send us a message" functionality on our website.

If you are a temporary worker or job seeker applying for a job, we may also collect the following types of personal data (in accordance with the Law):

- employment and training history;
- spoken languages and other employment-related qualifications;
- Social Security number, national identifier, or other identification number
- date of birth;
- bank account number;
- citizenship and information about residence permits or work visas;
- information about social benefits;
- tax information;
- information provided by references;
- information contained in your resume, information provided about your professional interests and other information about your qualifications for employment.
- information you provide to us about other people, such as emergency contacts.

and, when required by law, or with your consent:

- disabilities and health information;
- test results, criminal history and other background.

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How we use the information we collect:

The Data Controller collects and uses the data collected for the following purposes:

- provide recruitment and placement solutions;
- process payments;
- manage our relationships with customers;
- where permitted by Law, and in accordance with the Cookies Policy, send correspondence regarding open recruitment and placement opportunities and other communications;
- when permitted by Law, communicate and manage participation in special events;
- respond to questions and complaints from individuals;
- carry out, evaluate and improve our activity (including the development, analysis and improvement of our services);
- manage our communications; performing data analysis; accounting, auditing and others;
- protect, identify and seek to prevent fraud and other illegal activities, claims and other liabilities; It is
- comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies.

All processing of personal data will be carried out based on appropriate legal grounds (lawful grounds), which may fall into several categories, including:

- the consent of the data subject;
- compliance with a legal or contractual requirement, for example ensuring that remuneration and taxes are paid;
- the legitimate interest of the Controller, for example, allowing the user to access our Website.

In addition to the grounds listed above, if you are a crew member, employee, service provider or recruitment and placement candidate, we will use the information described in this Privacy Policy for the following purposes:

- provide recruitment and placement opportunities;
- provide you with HR, payroll, performance management and disciplinary services;
- provide you with additional services, such as training;
- assess your suitability and qualifications as a candidate for recruitment and placement;
- perform data analysis, for example, analyzing our candidate base; evaluate individual performance and skills; use information to match individuals and potential opportunities, and analyze hiring practice trend data.

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Legitimate Interest:

The Data Controller may process personal data for certain legitimate business purposes, namely:

- When the processing allows us to improve, modify, personalize or improve our services for the benefit of our clients and candidates;
- Identify and prevent fraud;
- For direct advertising purposes;
- Provide you with communications when we believe they will be of interest to you;

Whenever we process data for these purposes, we will ensure that we respect the rights of those concerned. They have the right to object to such processing and, if they wish, they can do so by contacting us as described at the end of this policy, with the exception that when exercising their right to object, this may affect our ability to provide a service for the benefit of the target.

How We Treat and Protect Personal Information:

We also process the personal data we collect by automated means, for the purposes defined above and for the period of time strictly necessary, in order to ensure that personal data is only kept for that period.

We adopt appropriate technical and physical measures to protect the personal data you provide to us against accidental, illegal or unauthorized destruction, loss, alteration, access, disclosure or use.

Promarinha preserves the confidentiality and integrity of data and protects it in accordance with this Data Protection Policy and all laws in force.

How Long Do We Keep the Data We Collect:

We store the personal data we collect in our systems, in order to allow the identification of data subjects, for no longer than the time necessary for which the data was collected (in the recruitment, selection, placement and management of crew members) or for the which data is subsequently processed.

We determine the necessary period, taking into account the need to keep the collected personal data stored, to provide the services contracted with the user, to safeguard a legitimate interest of the Data Controller and the existence of specific legal obligations, which make the processing necessary by the period determined by Law.

Information We Share:

We do not disclose personal data collected, except as described in this privacy policy or in separate policies communicated in a timely manner when providing a service.

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We may also share a recruitment and placement candidate's personal data with clients who may have job opportunities available or an interest in employing our candidates, and with others we work with, such as consultants and subcontractors, for employability purposes. of the candidate.

In addition, we may disclose personal data if we are required to do so by law or as a result of legal process, to maritime authorities, police or other government officials, based on a lawful request, and when we believe that disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of illegal activity.

Data Transfers:

The countries to which we may transfer the personal data we collect may be located inside or outside the European Union.

If we transfer your information to other countries, we will protect that data as described in this privacy policy and in accordance with the Law.

We may transfer the personal data we collect to countries where the information was originally collected. Such countries may not have the same data protection laws as the country in which you initially provided the personal data.

Rights as a Data Subject:

The data subject has the right to request from Promarinha access to personal data concerning him, its rectification or erasure, the limitation of the processing of his data and data portability, when technically possible. The data subject may object, at any time, to the processing of previously given consent. He also has the right to lodge a complaint with the supervisory authority, National Data Protection Commission, CNPD (in accordance with articles 15 to 22 of the GDPR).

Updates to Our Privacy Policy:

This Privacy Policy will be reviewed/updated at least annually, upon Management Review, to reflect changes in our privacy practices and legal requirements. If there are significant changes, we will notify those affected, either by email or by publishing a prominent notice on our website or social media.

How to Contact Us:

If you have any questions, comments, complaints or to exercise any rights regarding personal data, you should contact our Data Protection Officer: Pedro Martins

Rua da Ribeira Nova, nº46, 1º Esq., 1200-376 Lisbon

email: pedro.martins@promarinha.pt