

Protection Policy and Personal Data Treatment in the Selection and Recruitment Process

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1. INTRODUCTION

This document presents the terms in which SISTRADE intends to inform its Candidates of the general rules for the processing of personal data, which is always collected and processed with strict regard to and in compliance with the provisions of the personal data protection legislation in force, namely Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27th April 2016 ("GDPR").

SISTRADE respects the best practices in the field of security and protection of personal data, having for this purpose taken the necessary technical and organizational measures in order to comply with the legislation on the protection of personal data and ensure that the processing of personal data is lawful, fair, transparent and limited to authorized purposes.

SISTRADE is committed to the protection and confidentiality of personal data, having adopted the measures it deems appropriate to ensure the accuracy, integrity, and confidentiality of personal data, as well as all other rights regarding the respective owners.

2. SCOPE

This Personal Data Protection Policy applies exclusively to the collection and processing of personal data in the Recruitment and Selection Process for which SISTRADE is responsible for processing.

3. PERSONAL DATA

Personal data is any information, of any nature and regardless of its respective medium, including sound and image, relating to any one identified or identifiable person.

An identifiable person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number, location data, electronic

identifiers or one or more elements specific to their physical, physiological, genetic, mental, economic, cultural or social identity.

4. COLLECTION OF PERSONAL DATA

As part of the Human Resources Management Processes, SISTRADE ensures the confidentiality and security of the personal data collected, processed and stored. Applicants, by submitting their application, agree to the collection and processing of their identification, contact, professional and demographic data and information.

Data may also be collected from third parties, such as recruitment companies or professional references.

5. PROCESSING OF PERSONAL DATA

The processing of personal data consists of an operation or set of operations carried out on personal data or sets of personal data, using automated or non-automated means, namely collection, registration, organization, structuring, conservation, adaptation, recovery, consultation, use, disclosure, dissemination, comparison, interconnection, limitation, deletion or destruction.

Responsible for the processing of Personal Data

The entity responsible for the processing of personal data is SISTRADE which determines the purposes and means of processing.

For this purpose, if the subject of personal data needs to contact the data controller, he/she may send written communication addressed to the controller at the following address:

- E-mail: recrutamento@sistrade.com
- Letter addressed to the data controller, to the following address:
SISTRADE Software Consulting, S.A.

Travessa da Prelada, 511
4250-380 Porto, Portugal

6. PURPOSES OF THE PROCESSING OF PERSONAL DATA

SISTRADE processes the data provided by candidates with a view to potential recruitment and selection of job and/or internship opportunities. SISTRADE does not transfer the data to third countries or international organisations.

7. STORAGE PERIOD OF PERSONAL DATA

SISTRADE only retain recruitment records made during the five years period in accordance with current employment legislation.

8. COMMUNICATION OF DATA TO OTHER ENTITIES (THIRD PARTIES AND SUBCONTRACTORS)

SISTRADE may need to share your personal data with third parties acting on its behalf or providing services to them, however, it will not be sent or forwarded outside the European Union. This will be kept secure at all times and will only be shared with third parties where strictly necessary. In particular, your personal data may be disclosed to the following entities:

- Service providers, such as: IT services and systems administration, cloud storage and other software to meet the needs and management of the data within the scope of the activity developed;
- The Portuguese government or any other public authorities or national regulatory authorities, where SISTRADE is required to do so by any applicable laws.

9. DATA OWNER RIGHTS

The inherent rights as a data subject are as follows:

- i. Right of Access - The data subject has the right to access, to know, the data that the controller has about him or her.
- ii. Right to Rectification - The data subject may demand that the existing data concerning it be accurate and up to date, and consequently has the right to request its rectification, that is, its correction.
- iii. Right to erasure - The right to erasure of personal data ("right to be forgotten") is defined by the right of individuals to prevent the further processing of their data and to have it erased when it is no longer necessary for the purposes for which it was collected.
- iv. Right to Correct Data and Right to Oppose - If the data subject considers that its personal data is incorrect, incomplete or inaccurate, it has the right to rectify or complete it, without undue delay. The data subject may also object at any time to the processing of their personal data on grounds relating to their particular situation, where the processing is: necessary for the performance of a task carried out in the public interest or in the exercise of official authority; in the legitimate interests of the controller or a third party; and for the re-use of the data for a purpose other than that for which it was originally collected, including profiling.
- v. Right of Portability - Data subjects have the right to access their personal data free of charge.
- vi. Where processing is based on consent or on a contract, the data subject may also request that their personal data be returned to them or transmitted to another company. This is the right to data portability. The data must be presented in a commonly used format that can be read automatically.

- vii.** Right to limitation of processing - Limitation of processing allows the data subject to request the controller to restrict access to personal data or to suspend processing activities.
- viii.** Right to protection against automated decisions - Data subjects have the right not to be subject to any decision taken solely on the basis of automated processing. However, there are some exceptions to this rule, such as in the case where data subjects give their explicit consent to the use of automated decisions.
- ix.** Right to withdraw consent - In cases where data processing is carried out on the basis of your consent, you may withdraw consent at any time.

10. CHANGES TO SISTRADE'S PERSONAL DATA PROTECTION POLICY

SISTRADE reserves the right, at any time, to make readjustments or changes to this Personal Data Protection Policy, these changes being duly publicized via the different communication channels of SISTRADE. For that reason, you should periodically review this Privacy Policy to stay informed about how to help protect the personal data we collect. Use of the service constitutes acceptance of the terms of this Privacy Policy and any updates.

11. POLICY DISCLOSURE

This Policy is disclosed on the SISTRADE's intranet and website, as well as internally disclosed to all SISTRADE employees.

12. EDITION HISTORY

Edition	Date	Description
1	06-02-2023	Initial Edition
2	20-06-2023	Overall Policy Review