



## PERSONAL DATA & PRIVACY MANAGEMENT POLICY

### 1. Scope of application

This policy aims to present the commitment of Pluris Investments SA (hereinafter referred to as PLURIS or Group<sup>1</sup>) in relation to the management of privacy and protection of personal data<sup>2</sup> of the holders whose treatment is under its responsibility and to respond to the requirements of the General Data Protection Regulation and respective national implementing legislation<sup>3</sup>.

It is also intended to demonstrate how personal data will be processed in the context of the activity carried out by the Group and its employees, through the definition of internal rules that comply with the requirements of the Regulation, namely, legitimacy, processing and conservation.

All personal data will be processed and managed under the terms of this policy together with the Information Security Policy, taking into account an inventory carried out and updated of such personal data.

### 2. Roles and Responsibilities

Pluris' Management will ensure that this policy is aligned with the Group's strategy, in order to guarantee its continuous improvement in terms of information security and privacy.

The Data Protection Officer (EPD) is responsible for ensuring compliance with the Regulation's requirements in a continuous and systematic manner, that all rights of the holders are being fulfilled and that the appropriate security controls are operationalized for the purposes here defined.

PLURIS Management designates and attributes to the Data Protection Officer (or "DPO" – Data Protection Officer) the functions and responsibilities described above in relation to all Group companies.

All Group employees, as well as its subcontractors - where applicable - are responsible for collaborating with and complying with and enforcing the commitments of this policy.

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<sup>1</sup> By Group, it is understood all companies that are directly or indirectly participated in at least 10% of their share capital by Pluris Investments, S.A.

<sup>2</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and subsequent amendments.

<sup>3</sup> Law No. 58/2019, of 8 August (and its subsequent amendments) which ensures the implementation in the national legal order of the General Data Protection Regulation.



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In the case of river ships and seagoing ships, there is still room for the definition of a "Local DPO" per ship, whose mission is to exercise the functions of a local DPO when the ships are in a cruise situation, and which will act in accordance with the rules of this policy.

### 3. Holders of personal data

In order to carry out its activities and associated processing purposes, personal data are collected by Pluris from the following sources:

- Corporate customers by contract
- Registered customers through web tools
- Customers for ticketing acquisition
- Internal employees and contracted service providers
- Suppliers and service providers
- Visitors of physical land or nautical facilities.

### 4. Guarantee of Confidentiality and Privacy of Personal Data

The personal data identified in this Policy will be processed by Pluris as the entity responsible for the processing of personal data.

In order to guarantee the confidentiality and privacy of data, the Group ensures that they will only be accessed by employees formally authorized to carry out their duties.

The responsibilities of each employee in matters of Security, Privacy and Personal Data Protection are detailed in the contracts signed with Pluris, including the confidentiality and secrecy obligations to which they are attached.



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### 5. Identification of the person responsible for the processing of personal data

The person responsible for the processing of personal data is Pluris Investments, S.A., headquartered at Rua de Miragaia 103, 4050-387, Porto, Portugal, with the legal person registration number 508 767 881.

The PLURIS group leads a group of companies to which the responsibilities and obligations arising from this Policy apply.

### 6. Data Protection Impact Assessment

In cases where data processing operations are likely to result in a risk whose level is not accepted by the group, PLURIS will carry out, before the processing begins, an impact assessment with the aim of identifying and treating them.

### 7. Collection, processing, sharing and retention of personal data

#### a) Collection of personal data

##### 1. For situations that do not involve web tools

Personal data is collected directly in the following ways:

- Spontaneous applications or response to job offers sharing the Curriculum Vitae
- Filling out paper forms
- Capture of images and videos in fixed installations and on board sea or river ships
- Biometric data
- Email
- Telephone (for employees)
- When purchasing ticketing, marketing products or other materials purchased in physical stores or Group ships, including catering services



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Personal data can be collected indirectly, through the following ways:

- Importing the content of the Curriculum Vitae for the registration of human resources.
- Data import with shared responsibility with contracted commercial partners
- Marketing outlets, catering services or the like
- Job candidate selection companies
- Medical service providers
- Life insurance service providers

The collection of sensitive personal data will only be carried out for cases that are strictly necessary and justified by the activity carried out by PLURIS and its Group and in accordance with the legislation in force.

### **2. For situations involving web tools**

Personal data is collected directly through the organization's official web tools, namely online shopping websites, or indirectly through marketing automation tools and online advertising from duly authorized subcontractor partners and in full compliance with our policy on the privacy of personal data .

Indirect collections may also take place through subcontracting partners regarding the placing of orders, namely, the acquisition of ticketing for access to exhibitions or company services.

The cookie management policy complements this theme, presenting the “opt-in” and “opt-out” options that are available for this component of the websites.

The holder of personal data may also opt-out of online advertising services on social tools, namely, on Facebook, Google Ads, Instagram and LinkedIn.

### **b) Processing of personal data**

#### **I. For situations that do not involve web tools**



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For:	Purpose of treatment	Grounds/Justification
Appliance job management	Curriculum analysis and interview selection.	Management of the life cycle of hiring an employee
	Contact with the candidate at the various stages of the process.	
	Data retention for upcoming opportunities.	
	Contact with the candidate for new opportunities	
HR Management	Administrative management of human resources. Processing of remuneration. Issuance and processing of the medical fitness record. Analysis of the availability of employees for hotel operations on board river ships. Registration in the company's contacts and access directory. Announcement of birthdays via internal newsletter and personal SMS	Operational management of the organization support area
Physical Security	Access control. Capture of video surveillance images. Attendance record (time control). Registration of guests and visitors.	Control of the physical security of buildings, ships and other infrastructure supporting business operations
Internal and External Communications	Publication of news, testimonials, images and videos on the company's website, in the internal newsletter, company newspaper and on social media.	Promotion of the company and the events in which it participates
Commercial Management	Registration of customer contact in ERP and customer files. Registration and filing of commercial proposals. Invoicing, transport and delivery of products. Sending information, advertising campaigns, marketing and newsletters. Web Site Registration. Management of service claims.	Management of the business relationship with the customer
Financial Management	Billing and collections. Processing of refunds and returns. Information sharing with accounting service providers.	Operational management of the support area
Purchase Management	Registration of suppliers in ERP and supplier files. Consultation of supplier contacts and registration of activities.	
Technical Assistance	Requests for technical assistance of various equipment to contracted partners	Management of the service provided by third parties
Works Licencing	Application for a degree in works and creation of the respective buildings and support and maintenance infrastructure	Construction and maintenance management
Information Systems Management	Account management of e-mail systems and related services. Management of employee access to systems at the service of the company.	Access control
	Preparation of computers and mobile phones for delivery to the employee. Preservation of employee data for the above purpose.	Service provision to employees

There will be no use of personal data for the purpose of creating and using sales profiles or indicators of products, regions or trends.



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## 2. For situations involving web tools

Such activities include:

For:	Purpose of treatment	Grounds/Justification
e-Commerce recrutuung	User registration on websites, online stores, social media tools or marketplaces	Legitimate interest to provide web customer service
	Service request management on websites	
	Communication with the user/customer in the various phases of the service request process	
	Preservation of registered customer data for new service requests	
	Data transfer to digital marketing promotional newsletters sending platform	
	Data transfer for online advertising on social media	
	Customer support service ("online" or by phone)	
	Reporting with results of marketing and advertising campaigns.	
	<b>Management of candidates for vacancies in the Company</b>	

### c) Sharing of personal data

#### 1. For situations that do not involve web tools

In addition to the sharing purposes described below, no others may be carried out, unless expressly authorized by the Data Protection Officer.

Purposes arising from the activity of Pluris Investment SA and its Group companies, inter alia:

- Social Security;
- Communication with tax, customs or other legal entities;
- Communication of complaints or violations of privacy;
- Communication with the DPO;
- Port security and immigration control;
- Labor registration & pay roll;



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- Issuance of medical certificate for maritime or similar purposes;
- Compliance with registration and union obligations;
- Creation and registration of an Insurance policy;
- fulfillment of fiscal and customs obligations.

Personal data may be shared with entities subcontracted for the aforementioned purposes, under the terms of the contracts entered into with them. Pluris only uses subcontractors that guarantee, under the terms of the law, the implementation of appropriate technical and organizational measures to protect your data through subcontractors' agreements, thus ensuring the defense of their rights under the applicable data protection law.

The sharing of data classified as sensitive will only be carried out with legal entities, partners providing medical services and the like.

These data sharing will, as a rule, take place in the European space.

There are specific situations that require the sharing of data for entities outside the European space, namely:

- With the port authorities: for security and immigration control purposes on sea cruise ships, in accordance with the applicable legal provisions.
- With Group companies: to support activities of legitimate interest, ensuring the minimization of the processing of personal data

## 2. For situations involving web tools

In addition to the sharing purposes described below, no others may be carried out, unless expressly authorized by the Data Protection Officer.

Purposes arising from marketing, electronic payments and other services involving the use of electronic tools:

- Conducting advertising campaigns
- Advertising in virtual places like Google Ads, Facebook, Instagram and LinkedIn;
- Operational needs in the interconnection with HiPay and Paypal and other electronic payment gateways using credit cards;



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- Sending news, campaigns and personalized offers to the client.

There is room for sharing data with formally authorized subcontractors for the purposes of digital marketing, and the personal data involved in these sharing are subject to the consent of the respective holder, with the possibility of performing an "opt-out" at any time.

These shares can give rise to data transfers outside the European space, in cases of segmentation of digital marketing campaigns with intercontinental subcontracting partners. In these cases, the organization will take care to implement security controls appropriate to each identified risk situation, as well as assuring the holder the guarantee of the unconditional execution of their rights and all the requirements of the General Data Protection Regulation.

#### **d) Storage of personal data**

The period of time for which personal data will be kept varies depending on the purpose for which the data is processed.

Purpose of Data Preservation	Period of Retention	Grounds/Justification	
Legal Documents	10 years	Being applicable the legal regime in place.	
Job appliance data	5 years		
Human resources data	1 year		
Labour medicine data	5 years		
Data regarding unavailability for service justification	1 year		
Data regarding medical maritime certification <ul style="list-style-type: none"> <li>▪ For normal utilization or</li> <li>▪ When investigations may be carried out</li> </ul>	30 days 45 days		
Attendance records	5 years		
Video surveillance: <ul style="list-style-type: none"> <li>-In normal use</li> <li>- When in support of inquiries</li> </ul>	30 days 45 days		
Publications containing personal data of employees	Until the end of term of the agreement		In accordance with the operational needs and the strategy of the Company.
Publications containing personal data	3 years		
Data related to services/orders to customers by contract	3 years	In accordance with the operational needs and the strategy of the Company.	
Data related to services/orders to customers by Web	3 years	In accordance with the operational needs and the strategy of the Company.	
Photographs and videos of visitors and customers at events and exhibitions	1 day	Only available during the visiting day to the services	



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Marketing and advertising related data	until “opt-out” is made	Incllude cookies”, “newsletters” and sending of SMS
Data related to results of marketing and advertising campaigns	3 years	In accordance with the operational needs and the strategy of the Company
Privacy violation complaints	5 years	Legal court procedure support
Auditing registration	5 years	Legal court procedure support
Litigation and Judicial Procedures	20 years: Ordinary statutory period; 3 years: In tort liability; 5 years: Contractual liability.	- for setting up law suits or making defence of our rights (judicially or extra judicially)

Retention is understood as the secure storage of data, in digital or paper format, ensuring access management conditions to guarantee confidentiality, integrity, availability of information and non-repudiation, as well as its preservation under the appropriate conditions of use as a function of the defined time.

Legal requirements that require the retention of personal data for a minimum period for each purpose will be fulfilled.

When such a minimum period is not imposed, personal data will be kept only for the period strictly necessary to pursue the purposes for which the data were collected or are further processed or, if and when applicable, for the period determined by the data protection authority competent authority, after which the data will be permanently erased in secure mode.

**8. Use & Purpose of Cookies:**

Cookies are used to personalize content and advertisements based on visitor characteristics, interact with social media features, analyse website traffic, as well as support implemented security controls.

Depending on the visitor's options for website pages, data may be shared with our social media partners, for advertising purposes, for analyzing traffic and navigation through website pages and social media tools within the scope of this policy.

Under no circumstances will personal data be collected through cookies.

**a) Types of cookies:**

Cookies are text files that can be used by websites to make the user experience more efficient.





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According to current legislation, cookies may be stored and operated on the equipment the visitor accesses if they are strictly necessary for the website to function.

For all other types of cookies we allow the holder of personal data to exercise their right to informed consent.

Some cookies may be installed automatically by our business partners, always in an explicit way for visitors.

### **b) Websites may use the following types of cookies:**

#### **Ba) Required**

The necessary cookies support the execution of basic functions such as navigation between pages and the respective traceability.

It is important to note that the website may not function properly without these cookies, and as such, they are considered fundamental and justified.

#### **Bb) Statistical or Functional**

Statistical cookies help the website manager to understand how the visitor interacts with the pages that make it up, collecting and processing information anonymously.

#### **Bc) Marketing**

Marketing cookies are used to track visitor access and page usage sequence.

They allow the personalization of ads or other marketing materials to be displayed and that are relevant and appealing to the visitor, making the browsing experience more personalized and dynamic.

The website visitor, and as such holder of personal data, must select, in each available box, the type of cookies that he/she authorizes.

By clicking on the "I Accept" button, you are acknowledging your acceptance of this cookie policy and confirmation of authorization for the type of cookies selected.

### **9. Rights of holders**

Data subjects will be guaranteed the conditions to exercise their rights provided for by the general data protection regulation.

The Data Protection Officer appointed by the group will be involved in all matters relating to the protection of personal data, and should preferably be put in writing to the email address



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[dpo.mysticinvest@mysticinvest.com](mailto:dpo.mysticinvest@mysticinvest.com) any questions that the holders of personal data have understand necessary.

If the data subject intends to file a complaint or report a violation of privacy, the data subject may communicate through the email [complaint.mysticinvest@mysticinvest.com](mailto:complaint.mysticinvest@mysticinvest.com) or directly with the control authority that you select.

Alternatively, the holder will have at his disposal a communication portal via the web, where he will be able to carry out all the interactions mentioned above and obtain information on the processing of such requests.

Following the registration of complaints or violations of privacy, the Group undertakes to inform the holder of each step and progress in the process of making their complaint, without prejudice to compliance with the deadlines defined by the regulation.

### 10. Review and continuous improvement

This policy will be reviewed annually, or whenever there are significant changes in the inventory of personal data and/or computer or documental supports.

Each of these revisions will give rise to a new version of this document.

### 11. Disclosure and publication

The Privacy Management Policy is classified as publicly accessible information. (please see - Information classification policy) and will be available for consultation via the Internet, either on the institutional website, on the business support tools on the Internet and also on the group's social networks.

During the reception process, new employees will be given knowledge of this Policy, as well as the mandatory participation of those in training and awareness-raising in matters of security, privacy and protection of personal data that will be part of the reception process will be part of this process.

After publication and dissemination of the policy, employees are obliged to:

- Protect the information assets in your charge;
- Collaborate in the respective risk management;
- Participate in any event that may jeopardize information security;
- Comply with and enforce this policy.



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Employees may consult this Policy at any time through the document management platform of the group's internal network.

Entities/employees who, for reasons inherent to their role, do not have access to the platform, will be aware of this policy by sharing it in the appropriate format for each case.

**12. Term of Policy**

This policy was approved by the Management of the Pluris group and becomes effective on the date it is published.

Any subsequent changes will be effective immediately upon posting.

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