



Patricia Pilar
GRUPO

Code of Conduct Data
Protection - RGPD

2025

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A hand is shown drawing a white upward-pointing arrow on a light blue background. The hand is holding a white marker. In the foreground, there is a white line graph with several vertical bars of increasing height, suggesting growth or progress. The overall image has a light blue tint.

01 | Objective

01 | Objective

This Code of Conduct establishes the principles, guidelines, and standards that must be followed by the Patricia Pilar Group of companies, referred to as the **Patricia Pilar Group**, to ensure full compliance with the General Data Protection Regulation (GDPR - Regulation (EU) 2016/679 of April 27, and respective updates) and to ensure the protection of personal data of employees, customers, and partners.



02 | Scope of Application

02 | Scope of Application

This Code applies to:

- All companies within the Patricia Pilar Group.
- All employees, service providers, consultants, and partners who, in any way, have access to or process personal data in the course of their activities.

A hand is shown placing a wooden block on top of a stack of four other wooden blocks. The blocks are light-colored wood with a visible grain. The background is a solid light blue color. The text '03 | Fundamental Principles' is overlaid on the left side of the image.

03 | Fundamental Principles

03 | Fundamental Principles

3.1. Lawfulness, Fairness, and Transparency

The processing of personal data will be carried out legally, fairly, and transparently, ensuring that data subjects are aware of the purpose and legal basis for the processing.

3.2. Specific and Legitimate Purpose

Personal data will be collected for specific, explicit, and legitimate purposes and will not be processed in a manner incompatible with the initial purposes.

3.3. Data Minimization

The collection and processing of data will be limited to what is strictly necessary to fulfill the declared purposes.

3.4. Data Accuracy

We ensure that personal data is accurate, up-to-date, and corrected whenever necessary.

3.5. Storage Limitation

Personal data will be stored only for the time necessary to fulfill the purposes for which they were collected or in compliance with legal requirements.

3.6. Integrity and Confidentiality

Data will be processed securely, protected against unauthorized access, loss, destruction, or damage, through the implementation of appropriate technical and organizational measures.

3.7. Responsibility

The Patricia Pilar Group assigns the Ethics and Sustainability Department the responsibility to demonstrate compliance with GDPR regulations and to implement the necessary measures to ensure the protection of personal data.

If you have any questions or need more information about the use of your personal data, you may contact us through the following channels:

- **Address:** Rua Poço do Arroz nº 2, Casal da Lapa, 2560-030 A dos Cunhados – Dep. Ética e Sustentabilidade
- **In Person:** Departamento de Ética e Sustentabilidade
- **E-mail:** rgpd@patriciapilar.pt

A hand is holding a large, green checkmark sign with a white border. The sign is tilted upwards and to the right. The background is a solid teal color.

04 | Data Subject Rights



04 | Data Subject Rights

The Patricia Pilar Group respects and guarantees compliance with the rights of data subjects:

1

Right of Access:

Request information about processed data.

2

Right to Rectification:

Correct inaccurate or incomplete personal data.

3

Right to Erasure:

Request the deletion of data, except when processing is necessary.

4

Right to Object:

Object to processing in certain situations.

5

Right to Data Portability:

Request the transfer of data to another controller.

6

Right to Restriction of Processing:

Restrict processing in specific cases.

7

Right to Complaint::

File complaints at any time with the Data Protection Officer (DPO), and if not satisfied, contact the data protection authority CNPD - National Data Protection.

A hand holding a yellow highlighter over an open book. The background is blurred, showing a person in a green shirt. A large, semi-transparent green letter 'G' is overlaid on the right side of the image.

05 | Obligations of Employees and Partners

05 | Obligations of Employees and Partners

All employees and partners of the Patricia Pilar Group must:

1

Comply with this Code of Conduct and other internal data protection policies;

2

Process personal data only when authorized and with appropriate legal basis;

3

Maintain confidentiality about processed personal data, even after the end of the professional relationship;

4

Report security incidents or data breaches to the Ethics and Sustainability Department.



06 | Security Measures

06 | Security Measures

To ensure the protection of personal data, the Patricia Pilar Group implements technical and organizational measures such as:

- Physical access control to systems and personal data;
- Continuous monitoring to protect data;
- Employee training on data protection;
- Secure data storage

07 | Data Protection Officer (DPO)



07 | Data Protection Officer (DPO)

The Patricia Pilar Group has appointed the Ethics and Sustainability Department as the Data Protection Officer (DPO), responsible for:

- Monitoring compliance with GDPR and this Code.
- Acting as a contact point between the Group's companies, data subjects, and competent authorities
- Providing internal guidance and training on data protection

Contact details of the DPO:

- **Address:** Rua Poço do Arroz nº 2, Casal da Lapa - 2560-030 A-dos-Cunhados - Dep de Ética e Sustentabilidade
- **E-mail:** rgpd@patriciapilar.pt
- **Phone:** 910 495 366

In accordance with Article 38(5) of the GDPR, the DPO is bound by a duty of professional secrecy concerning all matters related to their functions, which continues even after the end of their tenure.

All data processors, including subcontractors and any individuals involved in data processing, are also subject to a duty of confidentiality in addition to professional secrecy obligations under the law.



08 | Data Breaches

08 | Data Breaches

In the event of a personal data breach, the Data Protection Officer will:

- Notify the competent authority within 72 hours, when applicable;
- Inform affected data subjects if the breach poses a high risk to their rights and freedoms;
- Implement corrective measures to mitigate damage and prevent future incidents.

A close-up photograph of a hand tipping a domino over a row of others. The dominoes are light-colored wood. The first domino on the left is falling, and the hand is tipping the fifth domino, which is about to fall. The background is a solid light blue-grey color.

09 | Sanctions

09 | Sanctions

Failure to comply with this Code of Conduct may result in:

- Disciplinary actions in accordance with applicable legislation.
- Termination of contracts in the case of partners or service providers.
- Legal and administrative sanctions as provided by the GDPR.

10 | Disclosure



10 | Disclosure

The Group ensures the dissemination of this Code of Conduct to employees, service providers, business partners, and stakeholders through various channels, including:

Company Website

The Code is published on the official company website at **www.patriciapilar.pt**, easily accessible to all employees and stakeholders;

Internal Channels

The Code is also communicated through internal channels to reach all employees and ensure access to the information;

Printed Format

A printed version of the Code is available so that everyone, including employees without online access, can consult it with ease;

Actions

Through training actions aimed at disseminating and ensuring knowledge acquisition and individual commitment by employees.

Any questions related to the interpretation or application of this document should be forwarded to the Ethics and Sustainability Department via email at **denuncias@patriciapilar.pt**.



11 | Code of Conduct Review

11 | Code of Conduct Review

This Code of Conduct will be periodically reviewed to ensure compliance with applicable legislation and evolving data protection practices.

Approved on: 31 / 12 / 2024



Patrícia Pilar

G R U P O