

## **INFORMATION**

**Atrium BIRE, SIGI, S.A.** (fully identified below) in its capacity as controller, provides, pursuant to the GDPR (General Data Protection Regulation; Regulation (EU) 2016/679 of 27 April 2016) and any further legislation on data protection that is applicable, upon collection of personal data included in your report under Law no. 93/2021, of 20<sup>th</sup> December and Decree-Law no. 109-E/2021, of 9<sup>th</sup> December, the following information:

<b>1. Identity and contacts of the controller</b>	Atrium BIRE, SIGI, S.A., with register and fiscal number 517.060.132, with share capital of Euros 37.000.000,00, and registered address at Lugar do Espido, Via Norte, 4470-177 Maia
<b>2. Categories/Types of personal data</b>	The personal data may include the following types of personal data: (i) any identification or contact data of the whistleblower (or informant) provided in the report; (ii) any different personal data the whistleblower reveals in its report; (iii) any personal data of the informant the Controller may already have and which proves necessary for the adequate investigation and assessment of the violation reported.
<b>3. Contacts of the data protection officer</b>	The controller has not appointed a data protection officer.
<b>4. Purpose(s) of processing</b>	Compliance with the law on the protection of whistleblowers, notably receiving the report and managing the inherent investigation and the communications with the informant.
<b>5. Legal basis for the processing</b>	Legal Obligation: Law no. 93/2021, of 20 <sup>th</sup> December and Decree-Law no. 109-E/2021, of 9 <sup>th</sup> December
<b>6. Recipients or categories of recipients of the personal data</b>	i) SÉrvulo & Associados – Sociedade de Advogados, SP, RL, as an external entity subcontracted by the Controller for the receipt of reports as its "Subcontractor" within the meaning of this term in the GDPR; ii) competent authorities if the breach of the law reported is to be further reported to them.
<b>7. Transfer of personal data to third country/international organisation</b>	Not applicable
<b>8. Storage period of personal data</b>	The personal data will be stored for the maximum period of 5 (five) years. However, any personal data communicated by the Whistleblower in the report and which is not relevant for the management of the reported violation will be deleted immediately.

<b>9. Existence of automated decision-making including profiling</b>	Not applicable
--	----------------

Additional Information:

A – Rights of the data subject

- The data subject may exercise before the controller with respect to the personal data concerning him/her and upon verification of the applicable legal conditions, the following rights:

**Right of access,**

**Right to rectification,**

**Right to erasure (right to be forgotten),**

**Right to the restriction of processing,**

**Right to object,**

**Right to data portability.**

For more information on the data subject's rights and the legal conditions for their exercise, please refer to articles 15 to 22 of the GDPR.

The data subject has also **the right to lodge a complaint with the competent supervisory authority.**

- The data subject can exercise its rights by e-mail to the following address:  
[dataprotection@sonaesierra.com](mailto:dataprotection@sonaesierra.com)

B – Provision of personal data: the provision of personal data in this context is neither a statutory or contractual requirement, nor is it a requirement necessary to enter into a contract; the data subject is not obliged to provide his/her personal data and should he/she choose not to no consequences will derive from it except for the impossibility to communicate to him/her the measures taken should he/she not have provided his/her contact.