

Privacy Policy (WEBSITE)

INTRODUCTION

The protection of privacy and personal data is a priority for INTEGRITY, S.A. - hereinafter as INTEGRITY - (PT509072054, headquartered at Avenida D. João II, n° 43, 9° Piso, Parque das Nações, 1990-084 Lisboa, Portugal), whose trading name is Devoteam Cyber Trust (the cybersecurity unit of the Devoteam Group), and a clear commitment assumed by us.

The present Privacy Policy describes in detail the terms under which INTEGRITY treats personal data as the entity responsible for their processing, which are collected and processed in strict respect and compliance with the provisions of the personal data protection legislation in force at all times.

This policy concerns the privacy practices within the activity carried out by INTEGRITY, namely in its websites. The personal data you provide us during your interaction with the various services will be treated with the guarantees of security and confidentiality required by the legal framework regarding the protection of personal data.

INTEGRITY respects the best practices in the field of security and protection of personal data, and to this end has taken the necessary technical and organisational measures in order to comply with the legislation on personal data and ensure that the processing of personal data is lawful, fair, transparent and limited to the authorised purposes.

The access and use of the services and websites by the user assumes that the user has read, understood and accepted the Terms of this Privacy Policy.

WHAT DOES THIS POLICY COVER?

This Privacy Policy applies exclusively to the collection and processing of personal data for which INTEGRITY is responsible, within the scope of the services and products made available to its Clients/Users and in all situations in which a processing of personal data by INTEGRITY occurs.

INTEGRITY's websites may include links to other websites that are not part of INTEGRITY. The provision of such links is made in good faith, and INTEGRITY cannot be held responsible for the collection and processing of personal data carried out through these websites, nor assuming any responsibility for such

websites, namely as to their accuracy, credibility and functionalities made available on them.

PRIVACY

INTEGRITY respects your right to privacy. The data requested are intended for the provision of the service requested by you, and no personal data will be collected that is not necessary for the provision of the service or without your consent.

Interaction with INTEGRITY's websites does not require user information, except when, for expressly identified purposes, registration is declared necessary and either by the user authorised according to the following terms.

DATA CONTROLLER (RESPONSIBLE FOR TREATMENT)

INTEGRITY AS DATA CONTROLLER:

- Ensures that the processing of your personal data is carried out within the scope of the purposes for which they were collected;
- Collects, uses and retains only the personal data necessary for the purpose in question;
- Treats personal data for legally prescribed purposes or for the provision of services at your request.

PROCESSOR (SUBCONTRACTANT)

As a subcontractor, INTEGRITY undertakes to comply with the privacy and personal data processing agreements entered into with the entities responsible for data processing.

TERMS OF USE

The use of INTEGRITY's websites presupposes the acceptance of this Privacy Policy.

INTEGRITY's websites do not store or collect personally identifiable information for the purpose of disclosure or sale to third parties for marketing purposes to the consumer or sending emails on behalf of third parties.

COLLECTION OF PERSONAL DATA AND INFORMATION FROM USERS

For those cases where it seems necessary and/or mandatory, INTEGRITY requests your express consent before using the information for purposes other than those expressly provided in this Privacy Policy.

➤ CONSERVATION PERIOD

INTEGRITY keeps the personal data according to the purpose of its collection:

- In accordance with the legislation that regulates the process;
- for another period as long as agreed and with the consent of the holder;

Personal data is kept for the period necessary for the purposes for which it was processed.

➤ PERSONAL DATA SHARING

INTEGRITY may only share personal data with third parties, complying with the legal and/or contractual provisions and obligations in force according to the cases, including but not limited to:

- Regulatory authorities, courts and/or official bodies.

RIGHTS OF DATA HOLDERS

The rights of Data Holders are provided for and determined in accordance with the applicable legislation.

In cases where the data processing is based on the consent of the data subject, the data subject may withdraw it, without prejudice, however, to the validity of the processing until that date.

Without prejudice to any other means of administrative or judicial appeal, the data subject may lodge a complaint with the competent supervisory authority under the law, specifically, the National Commission for Data Protection (www.cnpd.pt).

CHANGES TO PRIVACY POLICY

INTEGRITY reserves the right to change its Privacy Policy, therefore we advise you to regularly consult this document.

The changes are deemed to come into force from the date of their publication in this site, making express reference to the date of update.

FINAL CONSIDERATIONS

Any aspects related to the processing of personal data, the exercise of the rights of the holders of personal data, or any other questions about this policy, should be directed to the following contacts:

INTEGRITY, S.A.

Avenida D. João II, n° 43, 9° Piso,

Parque das Nações, 1990-084 Lisboa, Portugal

Or

E-mail: privacy@integrity.pt

DATE OF LAST UPDATE

DECEMBER 19TH, 2025