

PRIVACY POLICY

The respect for the privacy and rights of personal data subjects is very important to the Quadrante Group, in strict compliance with the General Data Protection Regulation (“GDPR”), as well as other applicable laws related to data protection.

In order to ensure that data subjects are provided with all necessary information to give free, specific, informed and unambiguous consent, the Quadrante Group has adopted this Privacy Policy. This Policy sets out the terms and conditions governing the processing of personal data by the Quadrante Group and explains how data subjects may exercise their rights under applicable data protection laws.

1 WHO IS THE CONTROLLER?

The personal data controllers concerning personal data collected through the website, clients, potential clients, partners, suppliers, partners, whistleblowers and reported persons and employees, are:

Infraconsult – Engenharia e Consultoria Unipessoal, Lda., tax registration number 505175738, headquarters at Estrada do Seminário, Nº4 – Edifício C – Piso 1 Sul, 2614-523, phone number 210067200, fax 210067299;

QUADRANTE, Engenharia e Consultoria, S.A., tax registration number 504092502, headquarters at Avenida da Boavista nº 1837, 2º Andar, 2.1, Edifício Torre Burgo, 4100-133 Porto, phone number (+351) 214070270, fax 218437939, and e-mail quadrante@quadranteglobal.com;

PROCESL – Engenharia Hidráulica e Ambiente, SA, tax registration number 501683631, headquarters at Estrada do Seminário, Nº 4 – Edifício C – Piso 1 Sul, 2614-523 Amadora, phone number (+351) 210067200, fax 210067299, and e-mail geral@procesl.pt;

ECOPROGRESSO – Consultores em Ambiente e Desenvolvimento, Lda., tax registration number 506273873, headquarters at Estrada do Seminário, Nº 4 – Edifício C – Piso 1 Sul, 2614-523 Amadora, phone number (+351) 210067200, fax 210067299, and e-mail geral@ecoprogresso.pt;

3 DRIVERS - ENGENHARIA, INOVAÇÃO E AMBIENTE, S.A., tax registration number 506506770, headquarters at Avenida Conde de Valbom, nº 6, 6º piso, 1050-068 Lisboa, phone number (+351) 216026334 and e-mail 3drivers@3drivers.pt;

QUADRANTE CMS, LDA., tax registration number 519188675, headquarters at Estrada do Seminário, Nº 4 – Edifício C – Piso 1 Sul, 2614-523 Amadora, phone number (+351) 214070270;

EXE-QUADRANTE, LDA, tax registration number 516512889, headquarters at na Estrada do Seminário, Nº 4 – Edifício C – Piso 1 Sul, 2614-523 Amadora, phone number (+351) 214070270, fax 218437939.

COMP4SS, ENGENHARIA E CONSULTORIA, S.A., tax registration number 517706784, headquarters at Estrada do Seminário, 4, Edifício C, Piso 1 Sul, Alfrapark, 2614-523 Amadora, Portugal, phone number (+351) 210067200 and fax 210067299.

2 WHICH DATA ARE PROCESSED AND HOW ARE THEY COLLECTED?

The companies of the Quadrante Group which are controllers only collect data that is appropriate, pertinent and restricted to the necessities related to the purposes for which data are processed, namely:

- a) Clients, potential clients, suppliers, partners, counterparts, as well as their respective representatives and employees, whether natural persons or representatives of legal persons: identification and contact data (such as name, professional address, telephone number and e-mail address), professional data (such as job title, company, department and professional role), personal photographs where relevant for professional identification purposes, billing data (such as invoicing address, tax identification number and payment references) and financial and patrimonial data (such as bank account details strictly necessary for payments), data relating to the professional relationship and activity, curricula vitae, academic and professional qualification documents, certificates of qualifications, declarations or certificates issued by professional orders or associations, identification card data (such as document type, number and validity date, where legally required), and any other personal data whose processing is necessary for the performance of a contract, the execution of pre-contractual steps or compliance with legal obligations.
- b) Contact requests (including professional contacts): identification data such as name, professional role and e-mail address;
- c) Applications: identification data such as name, date of birth, nationality, current residence; data related to education and work experience, such as academic degree, specialisation degree, educational institution and any data included in curricula;
- d) Employees: identification and contact data, professional and employment-related data, financial, patrimonial and family-related data, data relating to the professional relationship and activity (such as data strictly necessary to document the existence, management and execution of the employment relationship), including data relating to remuneration, benefits and statutory deductions, training records, working time and attendance records, occupational health and safety information, including data processed within the scope of occupational medicine services, medical fitness certificates and information relating to medical leave and temporary incapacity for work, insurance-related data, including data relating to workplace accidents and related insurance claims, performance management data and disciplinary records, trade union membership data and related payroll deductions where applicable, as well as data relating to the use of corporate systems strictly within the scope of the employment relationship, including access logs and security-related data, insofar as necessary for compliance with legal obligations or the management of the employment relationship;
- e) Physical access control and parking management:

1. Visitors and temporary badge holders: identification data such as name and, where strictly necessary for security purposes, identification document number and contact details (e.g. mobile phone number), collected for the purposes of access control, security and internal record keeping.
 2. Employees (permanent access badges): identification and contact data, including the employee's name and corporate e-mail address, processed for badge issuance, access management, internal security control and facilities management purposes.
 3. Employees requesting temporary access cards (in case of loss or forgetfulness): name, identification document details and mobile phone number, solely for verification and internal control purposes.
 4. Parking card allocation: name of the employee and the respective company within the Quadrante Group, recorded in an internal control file for space allocation and security management purposes.
- f) Whistleblowers and reported persons, within the scope of the whistleblowing channel: identification and contact data (where applicable), data contained in reports, supporting evidence and investigation records, and any other personal data strictly necessary for the handling, investigation and resolution of reports, in accordance with applicable legal requirements;

Personal data are collected by various means, namely through the completion of forms available on Quadrante Group's website, by sending e-mails, telephone contacts, the provision of professional business cards, the submission of requests for proposals or quotations, the submission of employment applications, the use of digital platforms and whistleblowing channels or the conclusion of contracts and the provision of services by the Quadrante Group.

As a rule, the Quadrante Group companies do not intentionally process special categories of personal data within the meaning of Article 9 GDPR, such as data revealing political or philosophical beliefs, religious beliefs, private life or racial or ethnic origin, as well as data concerning health, sex life or genetic data. However, in the context of employment relationships, certain special categories of data may be processed where strictly necessary to comply with legal obligations or to exercise specific rights in the field of employment law, in accordance with Article 9(2)(b) GDPR. This may include, in particular, occupational health data, information relating to medical leave or temporary incapacity, workplace accidents, and trade union membership data where required for payroll deductions or other legally mandated purposes.

3 WHAT ARE THE LEGAL GROUNDS AND THE PURPOSES FOR PROCESSING PERSONAL DATA?

The companies of Quadrante Group only process personal data when reasonable legal grounds exist.

The categories of personal data and data subjects identified in Section 2 are processed exclusively for the purposes set out below, in compliance with the principle of purpose limitation.

The processing of personal data relating to the categories of data subjects identified in Section 2 is carried out on the basis of the performance of contracts, the carrying out of pre-contractual steps,

compliance with legal obligations and, where applicable, the legitimate interests of the companies of the Quadrante Group, in accordance with points (b), (c) and (f) of Article 6 (1) GDPR.

Such processing is intended, in particular, for the following purposes:

- a) contract conclusion and performance;
- b) client, partner and supplier management and the provision of services;
- c) recruitment, personnel selection and human resources management;
- d) payroll processing, including remuneration, benefits, expense reimbursements, statutory deductions, tax and social security withholdings, enforcement of wage garnishments and non-nominative statistical processing, where required or permitted by law;
- e) occupational health and safety management;
- f) professional training and skills development;
- g) working time, attendance and absence control;
- h) performance management and disciplinary procedures, strictly within the limits permitted by applicable labour law;
- i) fulfilment of mandatory insurance obligations, including occupational accident insurance;
- j) network and systems management, including the support, monitoring, maintenance, testing and continuous improvement of infrastructures, applications and digital platforms;
- k) information security, including access control, authentication, logging, monitoring, incident management and cybersecurity measures;
- l) Physical access control, visitor management and parking allocation for security and facilities management purposes;
- m) administrative, accounting and tax management, including invoicing, payments, reporting and compliance with statutory obligations;
- n) dispute and litigation management, including judicial and extrajudicial claims and the exercise or defence of legal rights;
- o) management of the whistleblowing channel, including the receipt, analysis, investigation and resolution of reports, in accordance with applicable legal requirements;
- p) customer experience management and service quality monitoring;
- q) customer satisfaction assessment;
- r) commercial and business development activities;
- s) professional communications and the preparation and submission of proposals or quotations;
- t) public relations and corporate communication activities, including the dissemination of institutional and professional content through social media platforms (such as LinkedIn, Facebook and Instagram), where applicable and in accordance with the relevant legal basis;
- u) analytics and service improvement activities;

- v) processing of personal data in the context of corporate reorganisation, merger, acquisition or financing transactions involving the companies of the Quadrante Group, where and to the extent that such processing is necessary for the completion of the relevant transaction and in accordance with applicable law.

Where personal data are collected through the Quadrante Group's website, such data are processed solely for specific, explicit and legitimate purposes, in accordance with the principles of lawfulness, fairness, transparency and purpose limitation set out in Article 5 GDPR.

Personal data provided by data subjects through the website for the purposes of submitting contact requests, requesting proposals or quotations, or submitting applications are processed on the basis of point (b) of Article 6 (1) GDPR, insofar as such processing is necessary to respond to the data subject's request and to carry out pre-contractual steps prior to the possible conclusion of a contract.

Where the processing of personal data is necessary for compliance with a legal obligation to which the companies of the Quadrante Group are subject, including obligations arising from accounting, tax, labour, whistleblowing or other applicable regulatory legislation, such processing is carried out pursuant to point (c) of Article 6 (1) GDPR, which permits the processing of personal data where it is legally required and does not depend on the data subject's consent.

Where personal data collected through the website are intended to be processed for purposes that are not strictly necessary to respond to the data subject's request, namely, marketing communications, information about events or other similar informational or promotional content, such processing is carried out exclusively on the basis of the data subject's prior consent, in accordance with point (a) of Article 6 (1) GDPR.

Accordingly, personal data collected through the Quadrante Group's website may be processed in order to respond to contact requests, send proposals or quotations, provide information about services, manage recruitment processes and, where applicable and subject to the data subject's consent, send marketing and informational communications.

4 TO WHOM ARE PERSONAL DATA CONVEYED?

Personal data processed by the companies of the Quadrante Group may be disclosed to third parties solely where such disclosure is necessary for the purposes described in this Privacy Policy, for the performance of contracts, for the carrying out of pre-contractual steps, for compliance with legal obligations or for the pursuit of the legitimate interests of the companies of the Quadrante Group, in accordance with article 6 GDPR, and always subject to the principles of data minimisation, confidentiality and security.

In this context, personal data may be disclosed, in particular, to the following categories of recipients:

- a) Companies within the Quadrante Group, within the scope of shared services, internal reporting, institutional communications, internal training, improvement of service offerings and operational, administrative and financial management;

- b) Clients and partners, including public and private entities, consortium partners and other contractual counterparts, where such disclosure is necessary for the execution of projects, the provision of services, participation in public or private procurement procedures, contract management, technical coordination or compliance with contractual obligations;
- c) Service providers and processors, processing personal data on behalf of the companies of the Quadrante Group, namely in the areas of information technologies, hosting and maintenance of systems and platforms, cloud infrastructure, information security, recruitment, human resources management, occupational health and safety, accounting, auditing, consultancy, legal support, marketing, communications and customer satisfaction surveys, under agreements ensuring compliance with the GDPR;
- d) Administrative bodies, public authorities and official entities, including, by way of example, tax authorities, social security institutions, courts, regulatory authorities, embassies, consulates and local authorities, where such disclosure is required or permitted by law;
- e) Lawyers, solicitors and internal and external auditors, for the purposes of dispute and litigation management, the exercise or defence of legal rights in judicial or extrajudicial proceedings and compliance with legal and regulatory obligations;
- f) Electronic and technological platforms, including, in particular, public procurement platforms, recruitment platforms, digital service delivery platforms, enterprise management systems (such as ERP and CRM systems), electronic invoicing platforms, document management systems, professional communication and collaboration tools, cloud hosting infrastructures, information security and monitoring systems, as well as other technological infrastructures necessary for the activities of the companies of the Quadrante Group;
- g) Third parties involved in corporate reorganisation, merger, acquisition, disposal or financing transactions, as well as their respective advisers, lawyers and auditors, insofar as such disclosure is necessary for the completion of those transactions and is legally permitted.

Personal data collected through the Quadrante Group's website may also be disclosed between companies of the Quadrante Group and to service providers where necessary to respond to contact requests, manage recruitment processes, send marketing communications or comply with legal obligations, and shall not be disclosed for purposes other than those set out in this Privacy Policy.

In all cases, the disclosure of personal data is limited to what is strictly necessary and is carried out subject to the implementation of appropriate technical and organisational measures to ensure the protection, confidentiality and integrity of personal data.

5 FOR HOW LONG ARE PERSONAL DATA STORED?

The companies of Quadrante Group only store personal data in a way that allows the identification of data subjects during the period necessary for the purposes for which data are processed, notwithstanding the need to store data for longer periods for the purposes of complying with legal obligations.

Particularly, personal data are deleted after:

- a) In the case of contact requests: 6 months after the request was sent, where no subsequent contact existed;
- b) In the case of personal data collected upon receipt of applications or referral: maximum of 5 years.

6 INTERNATIONAL TRANSFERS OF PERSONAL DATA

The processing of personal data may involve the transfer of personal data to third countries (located outside the European Union or the European Economic Area) or to international organisations, within the scope of the purposes set out in this Privacy Policy, in respect of which no adequacy decision has been adopted by the European Commission.

In such cases, we undertake to implement appropriate security measures to ensure the confidentiality and protection of personal data, in accordance with the applicable data protection legislation. In particular, the transferred data will be subject to the appropriate safeguards provided for by law, and supplementary measures will be implemented where necessary to ensure that personal data benefit from a level of protection essentially equivalent to that afforded within the European Union.

7 WHICH RIGHTS DO THE DATA SUBJECTS HAVE?

Data subjects have the right to exercise the following rights in accordance with the General Data Protection Regulation (GDPR):

- a) Right of access: the right to obtain confirmation as to whether or not your personal data are being processed and, where that is the case, access to such data and to information about the processing operations carried out in relation thereto;
- b) Right to rectification: the right to request the rectification or completion of any personal data that are inaccurate, incomplete or not up to date;
- c) Right to erasure: the right to request the erasure of your personal data, except where their retention is required to comply with a legal or contractual obligation;
- d) Right to restriction of processing: the right to request the restriction of the processing of your personal data where the accuracy, lawfulness or necessity of the processing is contested, in which case the data may be retained solely for the purposes of the establishment, exercise or defence of legal claims;
- e) Right to data portability: the right to receive the personal data concerning you, in a structured, commonly used and machine-readable format, or to request their transmission

to another controller, where the legal basis for the processing is the performance of a contract or your consent;

- f) Right to object: the right to object, on grounds relating to your particular situation, to the processing of your personal data, including the right to request the cessation of the sending of marketing communications relating to a specific product or service, as well as the cessation of all marketing communications;
- g) Right to withdraw consent: the right to withdraw any consent previously given, without affecting the lawfulness of processing carried out prior to such withdrawal.

The Quadrante Group has appointed a Data Protection Officer (“DPO”) in Portugal who acts as the point of contact for all matters relating to the processing of personal data and the exercise of data subjects’ rights.

The DPO may be contacted through the following means:

- E-mail: rgpd@quadranteglobal.com;
- By post to the following address: Avenida da Boavista, No. 1837, 2nd floor, 2.1, Torre Burgo Building, 4100-133 Porto, Portugal.

In your request, you should indicate your identification details, the right you wish to exercise and the relevant grounds for such request. You may be required to provide proof of your identity in order to ensure that any disclosure of personal data is made exclusively to the relevant data subject.

Once analysed, your request will be responded to within the legally prescribed time limits (as a general rule, within 30 days).

Please note that you also have the right to lodge a complaint with the Portuguese Data Protection Authority (Comissão Nacional de Proteção de Dados – CNPD).

8 PROCESSING AS A PROCESSOR

Where the companies of the Quadrante Group act as processors within the meaning of the General Data Protection Regulation, the processing of personal data is governed by a written agreement entered into with the relevant controller, in accordance with article 28 GDPR, which sets out, inter alia, the subject matter, duration, nature and purposes of the processing, as well as the obligations and responsibilities of the parties.

9 HOW IS DATA SECURITY GUARANTEED?

The companies of the Quadrante Group implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, in accordance with Article 32 of the GDPR, taking into account the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of natural persons.

Such measures include, where appropriate, access control mechanisms, confidentiality obligations, security monitoring, incident management procedures, data protection training and other

safeguards designed to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

These measures are implemented as part of the Group's information security governance framework and are reviewed on a regular basis and updated whenever necessary to ensure their continued adequacy and effectiveness.

10 COOKIES AND SIMILAR TECHNOLOGIES

Further information on the use of cookies and similar technologies, including the processing of personal data collected through such technologies, is available in the Cookie Policy, accessible on the Quadrante Group's website.

11 AMENDMENTS TO THIS PRIVACY POLICY

We reserve the right to amend this Privacy Policy at any time. Any material changes will be communicated through appropriate channels. The most up-to-date version of this Privacy Policy will always be made available on the Website.

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