



Privacy Policy

Altice Portugal Whistleblowing Channel

Altice's whistleblowing channel was created with the aim of promoting the safe reporting of any breach of national and European Union rules, as well as any irregularities that contravene the internal procedures, policies and regulations of Altice Portugal and its subsidiaries.

The whistleblowing channel can be used anonymously, without the need to share personal data. However, if the whistleblower chooses not to remain anonymous, use of the channel will result in their personal data being processed. In addition, data may be collected on the person(s) being reported and/or witnesses. This Policy is therefore intended to clarify for the data subject the processing of their personal data collected through the Altice Portugal whistleblowing channel.

Responsible for treatment

The data controller is Altice Portugal, S.A. (hereinafter "Altice Portugal or "Altice").

Personal data collected and processed

The following personal data may be processed within the whistleblowing channel:

- The whistleblower (if the report is not anonymous): full name, e-mail address, relationship with Altice Portugal and/or its subsidiaries, as well as any other data included in the description of the report, in attached files or in clarifications provided by the whistleblower;
- From the accused: the data that the whistleblower indicates in the description of the report;
- Witnesses: name, e-mail address and other data provided by the whistleblower in the description of the report or in attached files.

Purpose of processing and legal basis

The personal data collected through the whistleblowing channel will be processed for the purposes of managing reports, investigating and resolving offences related to acts or omissions that contravene the rules contained in European Union acts, as well as national rules that implement them in the civil, criminal and administrative offence spheres. The data will also be processed for the purposes of communication with the whistleblowers when their identity is known, as well as with third parties as witnesses called in to investigate and resolve the report.

These personal data processing activities may be based on:

- I. The fulfilment of a legal obligation of Altice Portugal, namely regarding the protection of whistleblowers and the obligation to establish an internal whistleblowing channel;
- II. Altice's legitimate interest in collecting and investigating the submitted reports, as well as in learning about the matters reported that could call into question the organisation's principles and values.

Transfer of Personal Data

Communications received through the whistleblowing channel are handled by the relevant Altice Portugal department and analysed by a restricted team, subject to confidentiality obligations.

Personal data may be shared with independent service providers who assist in the investigation and processing of reports. These service providers will process the data in strict compliance with the obligations of secrecy, personal data protection, confidentiality and information security.



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Altice may also transmit the data to other entities, which act as data controllers, using it for their own purposes, if the conditions of lawfulness provided for in the General Data Protection Regulation (GDPR) are met, namely public authorities such as Judicial Courts and competent Regulatory Entities.

Retention of Personal Data

Under the terms of Directive (EU) 2019/1937 and Law no. 93/2021 of 20 December, the personal data that is the subject of a report will be kept and stored for a period of five years. The period will be counted from the date on which the processing of the report is closed and, independently of this period, during the pendency of judicial or administrative proceedings relating to reports.

Any data that is no longer considered relevant for processing the report will be deleted immediately.

Personal Data Security

Altice Portugal has taken the necessary precautions to preserve the security of the personal data that may be processed within the scope of the management of the whistleblowing channel, adopting the measures provided for in Law no. 93/2021, of 20 December and Resolution 765/2009 of the National Data Protection Commission (CNPD) on the Principles Applicable to the Processing of Personal Data for the Purpose of Internal Communication of Acts of Irregular Financial Management (Ethics Guidelines), or other relevant Resolutions that may be issued by the CNPD in these matters.

Altice Portugal has put in place safeguard procedures for the entire process of receiving, registering, analysing and deciding, so that the guarantees of completeness, integrity and confidentiality are ensured at all times.

International data transfers

Altice Portugal will endeavour to ensure that the processing of personal data takes place entirely within the European Economic Area. In exceptional cases and when absolutely necessary to achieve the processing purposes described in this Policy, Altice Portugal may transfer personal data collected through the whistleblowing channel to third countries or international organisations. Such transfers will take place to destinations that have an adequacy decision from the European Commission or that are subject to the appropriate safeguards provided for in the legislation, such as the adoption of standard contractual clauses for the transfer of personal data (pursuant to Article 46 of the GDPR). When carrying out such transfers, Altice Portugal will guarantee additional measures to ensure that personal data have a level of protection essentially equivalent to that existing in the European Union.

Rights of the Data Subject

The data subject may, at any time and free of charge, exercise their rights of access, rectification, erasure and restriction of processing, or the right to object to processing. Such requests should be addressed to Altice's Data Protection Officer, whose email address is dpoalticeportugal@altice.pt.

The data subject can also lodge a complaint with the Supervisory Authority, the National Data Protection Commission, via the website: www.cnpd.pt.

Changes to the Policy

Altice Portugal reserves the right to amend, add to or revoke this Policy, in whole or in part, at any time.

Any changes will be immediately publicised on this same online page. If they involve a substantial change in the way your data is processed, we will notify you of these changes using the contact details you have provided.