

This Privacy Policy establishes the terms under which Altice Portugal collects, uses, stores and shares personal data within the scope of managing the malpractice reporting channel. This channel is intended for the communication of events related to:

- **Human Rights and Social Responsibility:** practices such as child and/or forced labour, discrimination and inequality, harassment, limitation of freedom of expression or association, inadequate working conditions and health and safety at work, as well as actions to support the community;
- **Environment:** waste management, energy efficiency, sustainable use of natural resources, protection of biodiversity and natural habitats;
- **Market Practices:** misleading advertising and marketing, conformity and safety of products and services, consumer safety and privacy, provision of information on sustainable consumption and violations of applicable laws, standards or regulations.

The channel can be used anonymously, without the need to share personal data. In any case, if the author of the participation chooses not to remain anonymous, the use of the channel will result in the processing of their personal data. In addition, data may be collected on third parties involved in the event (e.g. witnesses). This Policy is therefore intended to clarify for the data subject the processing of their personal data in the context of the management of malpractice reports.

Responsible for treatment

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

Personal data collected and processed

The use of the malpractice reporting channel does not necessarily imply the provision of personal data. However, the author of the report may choose to include personal data in their report. The following personal data may therefore be processed:

- The author of the participation (if the participation 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 participation, in attached files or in clarifications provided by the author; and
- Third parties and witnesses involved in the participated event: the data that the author indicates in the description of the participation.

Purpose of processing and legal basis

The personal data collected through the malpractice channel will be processed for the purposes of managing reports, investigating and resolving practices that contravene the Altice Portugal Group's Code of Ethics and Conduct and the rules contained in European Union acts, as well as national rules that enforce them in the civil, criminal and administrative offence spheres. The data will also be processed for the purpose of communicating with the author of the report when their identity is known.

These personal data processing activities may be based on:

- I. Altice Portugal's legitimate interest in collecting and investigating the reports submitted, as well as in finding out about matters that may call into question the organisation's principles and values.
- II. The fulfilment of a legal obligation at the expense of Altice Portugal, including the communication of illicit practices to the competent authorities, when necessary.

Transfer of Personal Data

The communications received are processed by Altice Portugal 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.

Altice Portugal 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

The personal data collected will be kept for the period strictly necessary to fulfil the purposes of the processing, and in accordance with the applicable legal deadlines. At the end of this period, the data will be securely deleted, unless further processing is necessary for the fulfilment of new legal obligations or for the protection of the rights and legitimate interests of the Data Controller.

Any data that is not considered relevant for the processing of the participation will be deleted immediately.

Personal Data Security

Altice Portugal has taken the necessary precautions to preserve the security of the personal data processed within the scope of channel management from improper practices, adopting the appropriate technical and organisational measures to ensure the integrity and confidentiality of the personal data collected, protecting it

against unauthorised access, alteration, loss, disclosure or destruction, including, in particular, data encryption and access control.

In particular, 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.

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 Portugal'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.