

Website Privacy and Security Policy

Background

Zolve – Logística e Transportes, S.A. (“Zolve”) and **Zolve España – Logística y Transporte, SAU, Zolve Santander SAU, Zolve Madrid SAU e Zolve Vitoria SAU (“Zolve Spain”)** make up the recently established Iberian group of undertakings dedicated to temperature-controlled food product logistics and distribution. Although merged, each of the enterprises retains an autonomous and independent business structure.

Both entities, although maintaining their corporate structure, adopt uniform and standardised procedures regarding the processing of personal data collected through this website, or through any other channel, application, or other, in order to meet the intended purposes.

Accordingly, this privacy and security policy aims to provide regulations and clarity for all personal data subjects in terms of how and why personal data collected through the single website is processed by both enterprises, in Portugal and Spain.

Zolve and **Zolve Spain** act as personal data controllers, each of them being responsible for determining the reason for processing the personal data collected, and fulfilling and monitoring compliance with all contractual and non-contractual obligations provided for under current legislation in Portugal and Spain.

The personal data entered on the www.logifrio.com website is collected via the contact forms provided by **Zolve** and **Zolve Spain** for the purposes duly identified in this privacy and security policy.

The rules set out in this privacy and security policy do not supersede any clauses contained in any specific agreement with any customer, partner, supplier, contractor or employee of **Zolve** and **Zolve Spain**. This policy may supplement and/or complement the information contained in the various sectoral privacy agreements or policies established and internally implemented, but cannot replace them under any circumstances.

Scope of Application

This privacy and security policy applies to all personal data processed directly or indirectly by **Zolve** and **Zolve Spain**, as collected during the use and navigation of the www.logifrio.com website or upon completion of the contact form provided in the “Contact Details” and “Recruitment” section.

Personal data is considered to be any information of any nature and in any medium (physical, sound, image) concerning an identified or identifiable natural person, whereby an identifiable person is one who can be identified directly or indirectly, for example by their name, identification number, location data, electronic identifier, or other elements that can lead to the identification of said natural person.



By providing **Zolve** and/or **Zolve Spain** with their personal data, the subject and user of the website acknowledges and declares that:

- ❖ They are of legal age, this being 18 years old in both Portugal and Spain;
- ❖ They give their express, informed, full and unconditional consent to the collection and processing of their personal data for each of the purposes set out in this privacy and security policy, being perfectly aware that it may be withdrawn at any time, without the need for any justification and/or additional cost.

In terms of processing the personal data collected in this way, **Zolve** and **Zolve Spain** may specifically define sectoral and special privacy and security policies that improve, develop or specify certain aspects relating to the type of personal data shared and the processing carried out for the purposes indicated or new purposes that may be identified. These sectoral privacy and security policies will be made known to the personal data subjects and customers or users of the **Zolve** and **Zolve Spain** website through the previously agreed means.

The personal data controllers are:

ZOLVE – Logística e Transporte, S.A.

Headquarters: Zona Industrial de Riachos, Estrada do Relvas, 2350-375 Riachos;

Zolve España – Logística y Transporte, SAU.

Headquarters: Calle Yunque, 8, Pol. Ind. San José de Valderas 28918 Leganés, Madrid

Zolve Madrid S.A.U

Ctra. Villaverde – Vallecas, km 3.800
Mercamadrid, C/Eje, parcela H3 B
28053 Madrid

Zolve Santander S.A.U

Prolongación António Lopez, s/n
Depósito Franco
39009 Santander

Zolve Vitoria S.A.U

Ctra. De Bergara, 58
01520 Durada, Álvara

You may contact **Zolve** and **Zolve Spain** about any questions related to this privacy and security policy via the following contact details:

Email: GDPR@logifrio.com

Telephone: +351 249 839 700 or +34 902 43 42 41



Registered post with acknowledgement of receipt to **Zolve** – Zona Industrial de Riachos, Estrada do Relvas, 2350-375 Riachos or **Zolve Spain** - Calle Yunque, 8, Pol. Ind. San José de Valderas 28918 Leganés, Madrid.

Both **Zolve** and **Zolve Spain** own the www.logifrio.com website and are equally responsible for processing the personal data collected and shared when using and navigating the site and completing the contact forms provided.

The same website also shares content primarily related to logistics and food distribution activity in the Iberian market (Portugal and Spain) as well as various campaigns promoting food quality, the sustainable and ecological distribution of perishable food products, or others related to seasonal food activity, always focusing on cooperation between both enterprises in Portugal and Spain.

Why Zolve and Zolve Spain process your personal data

Personal data is collected when navigating the www.logifrio.com website and through contact forms with certain aims, subject to your consent:

- a. Content management - which consists of the collection of personal data, subject to consent from the customer/user of the website, for the purposes of receiving, consulting and disseminating promotions, news, or other information related to the activities conducted by **Zolve** and **Zolve Spain**;
- b. Management of the contractual relationship – we may collect your personal data to facilitate the sale and purchase of our services, respond to requests for clarification, queries or questions related to our services and/or anything else related to the activity of **Zolve** and **Zolve Spain**. To meet this objective, the personal data will be collected via the contact form provided and the personal data subject will be responsible for completing it.
- c. Cookies/Pixel Tags – collection of personal data to determine the number of users, understand how users access the www.logifrio.com website, and identify their behaviour and preferences within the site.
- d. Management of the pre-contractual relationship – collection of personal data as part of external recruitment and selection processes, through the receipt of spontaneous applications to fill job vacancies. Personal data will be collected when the appropriate form is completed in the website’s “Recruitment” section, which allows the candidate to apply for a position at **Zolve** or **Zolve Spain**.
- e. Management of whistleblower complaints - collection of personal Data for the processing of whistleblowing complaints made through the form in the section of the whistleblowing portal and, where applicable, to carry out the corresponding internal investigation.

Personal Data will also be processed by Zolve and Zolve Spain, within the scope and for the performance of any existing contract and, whenever necessary, to ensure compliance with any legal obligation and/or defend its legitimate interests.

Grounds for personal data processing

- a. Consent of the interested party:

For cases where this is necessary and whenever legally required, we will request express, explicit, informed, full and unconditional consent before accessing and using your Personal Data for each of the processing purposes, or for any different purpose, even related to any of the above.

The personal data subject’s consent is granted by selecting the option *“I accept the terms and conditions of this privacy and security policy, providing my express and informed consent to the processing of my personal data for the following purposes:*

- ❖ *Content management – for marketing and promotional purposes, through newsletters, news, promotions, and other information related to the activities of Zolve or Zolve Spain”.*
- ❖ *Management of the contractual relationship – for any queries about the activities of Zolve and Zolve Spain, as a way of ensuring that any reply is sent promptly in order to meet the needs of any customer/user of the website.*
- ❖ *Cookie/Pixel tag management – to automatically collect personal data in order to*



ensure the customer and/or user of the website has a better experience and enjoys access to all functionalities. Similarly, personal data may also be collected to identify the user's behaviour, according to their preferences, or the areas they consult".

b. Legal obligation:

The data contained in the whistleblowing portal form is handled in accordance with applicable legislation on data protection and on the protection of whistleblowers.

Spain	Portugal
Lei Orgânica nº 3/2018, de 5 de dezembro, protection of personal data and guarantee of digital rights.	Lei 58/2019, de 8 de agosto, GDPR implementing law.
Lei 2/2023, de 20 de Fevereiro, on the protection of people who report regulatory violations and the fight against corruption.	Lei 93/2021 de 20 de dezembro, establishing the general regime for the protection of whistleblowers.

c. Performance of a contract and legitimate interest:

Personal data may be processed in the context and for the performance of any existing contract and, where necessary, for the defense of the legitimate interests of Zolve and Zolve España.

Category of personal data

The following personal data will be processed by **Zolve** and **Zolve Spain**:

- ❖ Contact details – telephone number, mobile number, email address, postal address;
- ❖ External identification data – name, tax identification number (purely for processing contract formalities and for pre-contractual management with respect to filling job vacancies);

All personal data collected is appropriate, restricted and proportionate to each of the processing purposes described above.

Both **Zolve** and **Zolve Spain** process the personal data collected automatically (through cookies) and manually (through the completion of contact forms for each of the purposes), scrupulously observing all of the legal grounds for processing and obtaining the express, explicit and informed consent of the customer and/or user of the website for the required purposes, such as marketing and advertising campaigns, content management and the monitoring of information downloaded and collected through the website. For more information about cookies, consult our cookies policy at <https://logifrio.com/wp-content/uploads/2023/02/Politica-de-cookies-ENG-Jan-23.pdf>

Collection of Personal Data

Zolve and **Zolve Spain** collect personal information when the customer or user provides personal data directly via the contact form on the website, or when cookies are activated to collect personal information that allows the customer and/or user to be identified.

The personal data provided in the contact form will be processed automatically, being exclusively handled and used in order to directly reply to the message sent. Personal data collected via the contact form will not be entered into any database without the express consent of the subject. Information marked (*) in the contact form is mandatory. Failure to complete any mandatory information will make it impossible to analyse the information requested in relation to the enquiries and/or services sought, as the case may be.

The personal data collected for content management, namely for receiving newsletters, news or information related to the activity of **Zolve** and **Zolve Spain** will be processed automatically, and all information will be sent to the customer and/or user after their express and informed consent has been granted. Personal data will not be entered or shared in other software without the consent of the personal data subject.

The personal data collected when submitting spontaneous applications will be processed automatically and entered into the **Zolve** and/or **Zolve Spain** database, depending on the recipient selected by the user. The personal data collected will be stored in the respective database so that it can be assessed and so that a job vacancy can be subsequently filled. Once the application form has been completed, the user will receive an email, addressed to the indicated email address.

The personal data collected through the web form of the whistleblowing portal are entered into the infraction report management software, so that they can be managed by authorized persons designated as channel managers. Once the form has been completed, the user receives a code to accompany his report and an email message confirming receipt of the report.

Personal data storage and maintenance period

Zolve and **Zolve Spain** process and store the personal data of their customers and/or users of the www.logifrio.com website in line with the related purposes, retaining the data only for the period strictly necessary and appropriate for meeting each of the processing purposes described above.

Therefore:

- ❖ For content management – **Zolve** and **Zolve Spain** will store personal data as long as the consent granted by the personal data subject is not withdrawn as regards sending newsletters or any other promotional information or information concerning the activity of both enterprises;
- ❖ For managing the contractual relationship – whenever personal data is provided in the contact form in order to answer any questions related to the activity of **Zolve** or **Zolve Spain**, or to request any clarifications, the personal data will be handled and processed until a reply is sent and duly received by the personal data subject. Once this purpose has been fulfilled, the personal data entered will be deleted and/or anonymised, depending on the procedure adopted by each of the enterprises. If the contact form is completed to conclude any contractual relationship, the personal data will be stored in the **Zolve** and/or **Zolve Spain** database for contact purposes, to manage the contractual relationship, and for any other purposes provided for in Zolve's internal privacy and security policy.
- ❖ For managing the pre-contractual relationship – where personal data is provided and collected for the purpose of submitting an application for a job vacancy, the personal data will be stored in the **Zolve** or **Zolve Spain** database for a period of one year, after which it will be deleted or anonymised, depending on which is deemed most appropriate. If the user withdraws their consent to the processing of their personal data, indicating that they do not wish to have their personal data stored in the respective database, **Zolve** and **Zolve Spain** will immediately delete all said data collected through the website, including the CV.
- ❖ For cookies/pixel tag management – the storage and processing periods for data collected through cookies installed on the website are defined in the cookies policy, which may be consulted at www.logifrio.com.
- ❖ Management of whistleblowing communications and, if applicable, subsequent investigation: The data of the author of the received communication and, where applicable, of third parties, will be kept in the system only for the time necessary to carry out the management of the complaint, the its further investigation and the fulfillment of legally established obligations.

Notwithstanding the above, the personal data subject may at any time object to the storage and processing of their personal data, or simply invoke their right to be forgotten, and may also revoke, at any time or in any circumstances, the consent granted for processing their personal data (where applicable). Whenever any of these rights is duly exercised, **Zolve** and **Zolve Spain** will, as soon as possible, delete or anonymise the personal data in question, depending on which is deemed most appropriate.

Zolve and **Zolve Spain** will retain personal data necessary for compliance with certain legal obligations, particularly fiscal or contractual obligations, which may require that certain personal data be stored for a period of not less than five years, or to safeguard their legitimate interests (defence in the context of any administrative, judicial, extrajudicial or administrative offence proceedings).

Once the storage period has elapsed, **Zolve** and **Zolve Spain** will delete or anonymise the personal data (where possible), provided that it is not to be kept for any of the other remaining purposes.

Communication and sharing of Personal Data

Since they are enterprises in the same group, **Zolve** and **Zolve Spain** share the personal data collected through the www.logifrio.com website among themselves for any of the processing purposes described above.

Similarly, **Zolve** and **Zolve Spain** grant third-party subcontractors access to personal data so that they can provide the services necessary for collecting and managing all the information required for operating the website and subsequently handling and processing said information.

For the same purpose, **Zolve** and **Zolve Spain** employ more specialised subcontractors, who develop and maintain the website and conduct promotional activities related to each of the enterprises.

Zolve and **Zolve Spain** recognize that they may communicate User data within the scope of merger, acquisition and/or incorporation processes in which they find themselves, not considering this communication as a transfer of data to third parties, nor any subcontracted treatment.

Zolve and **Zolve Spain** may also transmit data to third parties within the scope of investigations, inquiries and judicial, administrative and/or similar proceedings, if they are duly ordered by court order to that effect.

In the context described above and for the purposes set out in this privacy and security policy, **Zolve** and **Zolve Spain** share and transfer the Personal Data collected through the website with other subcontracted entities, in which all the essential security measures are implemented to ensure the correctness, integrity, accuracy and confidentiality of personal data, object of treatment, and duly monitored compliance with all legal and contractual obligations. If you wish to access the list of subcontracted entities with which Zolve and Zolve Spain share your data, simply request it via email gdpr@logifrio.com.

Zolve and **Zolve Spain**, in compliance with legal and regulatory obligations, verify and require third-party subcontractors or partners to comply with and implement the same security measures implemented and to undertake to take all precautions and security procedures, depending on the category or type of Personal Data shared and the risks associated with each type of treatment, to protect the security of Personal Data and prevent its distortion, corruption and indiscriminate access to it by unauthorized third parties.

Within the scope of the management of communications of complaints on its internal platform, where applicable, of its subsequent investigation, **Zolve** and **Zolve Spain** may communicate data to the following recipients:

- Persons appointed to manage the channel and investigate complaints.
- Public authorities with competence in the matter in case it is necessary to communicate the case.
- Entity appointed to resolve the case.
- Where appropriate, the person being investigated, so that you can present your defence.
- The decision taken will be transmitted to the workers' legal representatives.

Subcontractors

Zolve and **Zolve Spain** are not responsible for the content of privacy and security policies issued by subcontractors, nor for any published or associated content or links posted and referenced on each of the web pages. All content published on the web pages of each subcontractor is their sole responsibility.

Transfer of personal data

Zolve and **Zolve Spain** and subcontracted entities/partners will process subjects' personal data entirely within the European Union Area, with no international transfer of personal data being envisaged.

If data transfers to third countries that do not belong to the European Union or the European Economic Area may occur, **Zolve** and **Zolve Spain** will comply with the law, namely with regard to the suitability of the destination country with regard to the protection of personal data and the requirements that apply to these transfers, not transferring personal data to jurisdictions that do not offer guarantees of security and protection.

Customer and user responsibilities

Personal data subjects must exercise due care when accessing the www.logifrio.com website, avoiding unauthorised access to their personal data, where applicable, and ensuring all information entered and/or associated with consulted content remains completely confidential.

Zolve and **Zolve Spain** recommend that all personal data subjects (customers or website users) adopt the necessary security measures, including maintaining equipment (phones, tablets and others), updating and configuring programs, as well as using any security measures against malicious software or software of dubious origin.

The personal data subject is also responsible for all the information entered into the contact forms provided on the website, ensuring it is complete, truthful, correct and accurate. If the personal data subject (customer or user of the website) provides false, inaccurate or incorrect information to **Zolve** or **Zolve Spain**, neither of them may be held liable for any damages or losses that may arise from the deficient information provided, or for any content that refers to other pages containing content or alluding to services that are considered unlawful, harmful, defamatory or contrary to public order.

Data Subject Rights

All data subjects may, at any time and usually free of charge

– in accordance with the legislation in force – exercise the following rights: the right to information, access, correction or deletion as relating to personal data; the right to portability, and the right to restrict or oppose the processing of their personal data.

Thus:

1. Right to information – the personal data subject has the right to consult, at all times and in an available place with easy and unconditional access, all information on the areas and activities where their personal data may be subject to any type of processing;

2. Right of access – the personal data subject has the right to know if their personal data is processed, the reasons for processing, the category of personal data processed, the entities with which their personal data may be processed and shared, the storage periods, the origin of the data and the means or methods by which it is collected and its possible transfer to other entities located outside the European Union;

3. Right of correction – the personal data subject has the right, at any time and free of charge, to correct their personal data if it is inaccurate or outdated;

4. Right of deletion – the personal data subject has the right, at any time and free of charge, to delete their personal data provided that and from the moment when: (i) their personal data is no longer required for the intended purpose and there is no law requiring it to be stored for a longer period; (ii) whenever the personal data subject withdraws their consent (where applicable); (iii) whenever the data has been collected and/or processed unlawfully; (iv) whenever the personal data subject has objected to the use and processing of their personal data for marketing and advertising purposes, including profiling;

5. Right to restriction of processing – the personal data subject may, for a certain period, request that the processing of their personal data be restricted and that it not be shared with third parties or deleted. The personal data subject may exercise this right if they discover that their personal data is incorrect or inaccurate;

6. Right to personal data portability – the personal data subject has the right to receive from the controller, in the case of **Zolve** or **Zolve Spain**, their personal data in a structured, commonly used and machine-readable format, and may equally transmit this data to another responsible entity, provided that they have given their consent or the processing is contract-based and is carried out automatically or by automated means.

7. Right to object – the personal data subject has the right to object to their personal data being processed where it concerns the possible reuse of said data for a purpose other than that envisaged for a given type of processing, or where the personal data may be used and processed to safeguard the legitimate interests of **Zolve** or **Zolve Spain**, or third parties, or where the personal data is being used for marketing or advertising purposes.

All rights may be exercised at any time, free of charge, provided that the request is not manifestly unfounded or excessive, in which case **Zolve** or **Zolve Spain** reserve the right to require payment of a fee to cover all the associated administrative costs.

Any of the above rights may be exercised through any of the following means:

- Email to the email address GDPR@logifrio.com;
- By post to the following addresses: **Zolve**: Zona Industrial de Riachos, Estrada do Relvas, 2350-375 Riachos; or **Zolve Spain**: Calle Yunque, 8, Pol. Ind. San José de Valderas 28918 Leganés, Madrid



Zolve and **Zolve Spain** agree to respond to the request as soon as possible, never exceeding the legally established time limits, and justifying and providing reasons for their decision, in accordance with the legal parameters and provisions in force.

Zolve and **Zolve Spain**, and their subcontractors and partners, scrupulously comply and will continue to comply with all the rights granted and exercised by personal data subjects, as well as the duty to inform, as provided for in the applicable legislation and within the scope of the contractual relationships established with the respective personal data subjects.

In any event, if the personal data subject considers that their rights have been violated or that there has been a failure to safeguard said rights, they may submit a formal complaint to the National Data Protection Commission in Portugal, or the Spanish Data Protection Agency in Spain.

Mandatory nature of the Personal Data requested

As mentioned above, there may be personal data duly identified in the contact or job application forms on the website that is essential for meeting the intended purposes or legally prescribed obligations.

If the personal data subject does not provide their personal data, **Zolve** and **Zolve Spain** will be unable to provide or perform the services, or activate all the technical functionalities available on the website in order to correctly and properly process the personal data collected for the intended purposes.

Safety and Security Measures

Zolve and **Zolve Spain**, forming part of the same group of undertakings and dedicated to the same sector of activity, promote and adopt all due and legally required precautions for ensuring the privacy and security of personal data collected through the www.logifrio.com website, guaranteeing that all information is secure in both online and offline systems.

Whenever sensitive information or information with a greater degree of confidentiality is collected (such as personal data contained in a CV pertaining to the applicant), the data will be encrypted using the Secure Socket Layer (SSL) protocol. This SSL technology is used to improve the quality of personal data transfer and sharing over the internet by encrypting and protecting data and information considered sensitive, using the HTTPS protocol, thereby reassuring the personal data subject that their data will not be fraudulently intercepted and that all information will be treated with the highest level of security.

Governing Law

This privacy and security policy has been drawn up in accordance with the GDPR and the law in force in Portugal and Spain and is wholly governed by them.



Changes to the Privacy and Security Policy

Zolve and **Zolve Spain** reserve the right to amend this privacy and security policy, or any of its terms and conditions, always in accordance with the applicable laws of each of the countries and those of the European Community.

Zolve and **Zolve Spain** will not be liable for content accessed via any hyperlink which leads the personal data subject to navigate outside the website, portal or any platform provided, nor for the processing of personal data carried out therein, such hyperlinks or processing being the responsibility of third parties.

Third-party pages and content are not subject to this privacy and security policy. We therefore advise that, whenever you browse or consult these sites, you access and read the privacy policies, as well as the applicable terms and conditions.

Last update: August 2023