

Privacy Policy

1. Privacy Policy

1.1. This document establishes the Privacy Policy for the Website of Progresso (hereinafter “Privacy Policy”) and integrates the Terms and Conditions of Use of that same Website (hereinafter “Terms and Conditions”) and it should be read along with them. The Terms and Conditions establish the rules of use of the Website, including waivers and limitations of responsibility. Please read the Privacy Policy and the Terms and Conditions carefully, before using the Website. By agreeing to share your personal data you are authorizing their collection, treatment, and use according to the rules defined here.

1.2. Unless otherwise stated in this document, all the defined terms that are part of this Privacy Policy will bear the meaning attributed to them in the Terms and Conditions.

2. Entity Responsible for the Treatment

2.1. The entity responsible for the treatment of personal data is Metalúrgica Progresso de Vale de Cambra, S.A., NIPC 500 192 480, Rua Arlindo Soares de Pinho, 143, 3730-404 Vale de Cambra (hereinafter “Company”).

2.2. The contact details for the Company are:

Email: geral@progresso.pt or

Posting address: Rua Arlindo Soares de Pinho, 143, 3730-404 Vale de Cambra.

3. Treatment of Personal Data

3.1. By using the contact form, the User expressly agrees to the treatment, by the Company, of the following categories of personal data: name, phone number and email address; the IP address of the computer or mobile device used to access the website may also be collected. We will also treat all personal information sent by the User to the Company by post, phone, fax, mobile message, or by any other means of communication.

3.2. Navigation and site registration involve the use of Google Analytics and there is, therefore, aggregated data treatment, by the Company and Google, of the following categories of information: geographical location of the access (continent, country, city), age, gender, language, device used during access (for instance,



mobile device, tablet, desktop) and navigation behaviours on the page (for instance, new user or returning user, average time per session, average time on each page, including in the private area). About the use of Google Analytics on the Website, please see item 6 below.

3.3. For the effect of what is laid out in this Privacy Policy, any data or personal information, regarding the user, treated by the Company will be, generically and for the effects of this Privacy Policy, designated as “Personal Data”.

3.4. Some personal data are of mandatory supply, are duly marked and, if they are lacking or insufficient, the message will not be sent by the User to the Company.

3.5. By filling out the Website’s contact form, the User expressly consents to the treatment of their Personal Data for the following uses:

- A) navigation and use of the Website;
- B) management of contacts with the User;
- C) sending information or events related with the Company;
- D) execution of marketing actions;

3.6. The Website may provide areas related with games, contests, or forums (chat forums) and, for each one of them, Personal Data may be required of the User, which will only be treated after receiving the User’s express consent; before manifesting consent, the User will be informed about the category of Personal Data to be treated and their intended uses; these Personal Data are subjected to this Privacy Policy.

3.7. The User expressly authorizes the Company to carry out or promote the execution of marketing actions by sending ad messages to their phone or email, or for the promotion of products and/or events related with it.

3.8. The protection of the User’s privacy is a concern for the Company. The personal data collected are treated by computer, in strict compliance with personal data protection laws, and they are stored in specific data bases, created for that effect. The Company strives to adhere to the best practices regarding security and protection of personal data, by promoting actions and improving systems to safeguard the protection of Personal Data, and it commits itself to adopting logical and technical safety measures adequate to the protection of the Personal Data treated, for the purposes stated above.

3.9. There is no use of subcontractors and no communication of data to other entities.



4. Consent

4.1. Regarding direct marketing actions, we will ensure that the User will have the right, in every one of them, to revoke consent, needing only to click the “unsubscribe” link in the message sent.

4.2. Revoking consent for the treatment of Personal Data, as predicted in the previous paragraphs, implies, depending of the specific situation, the limitation of navigation on the Website, as well as making it impossible to receive direct marketing messages.

5. Accessing, updating, or eliminating Personal Data

5.1. Unless stated otherwise by the owner of the data, the Company will assume that the data collected were inserted by them, that the insertion was by them authorized, and that they are true and exact.

5.2. The Company guarantees the User the right to access their data, with no restriction and no unjustified delays, relaying the information concerning their data in a clear language, rigorously corresponding to the contents of what is registered.

5.3. For exercising the right to access, rectify, and eliminate Personal Data, the User shall address the Company in writing, at one of the posting addresses or email addresses stated on line 2.2 above.

6. Cookies and storing and accessing information

6.1. The Website uses “cookies”. Cookies are small text archives that identify your computer on our server; the Website is located in a standard Apache server. The Cookies themselves do not identify the individual user, only the computer or device used.

6.2. We use, on this Website, the services of Google analytics to assess the efficacy of our contents and the preferences of our users, which allow us to contribute to the optimization of the functioning of this Website. We use performance cookies to monitor how our individual users access our Website and the regularity of access. This information is only used for statistical effects, without identification of any particular user.

6.3. All browsers allow the User to accept, refuse, or delete Cookies, namely through the selection of the appropriate settings on said browser. You can configure Cookies in the “options” or “preferences” menu of your browser. To learn more about Cookies, visit www.allaboutcookies.org.



6.4. As stated on line 3.2 above, the Site uses Google Analytics, which collects and processes User data. The use of Google Analytics has the following goals: accessing statistical information about the Users, determining the use, interest, and number of accesses to the Site, tracking and monitoring pages and content visited, countries from where the Site is accessed and the ways of using the Site. To learn more about Google Analytics, visit www.google.com/intl/pt/policies/privacy/partners/.

6.5. The Company will obtain, from the User and whenever necessary, their consent regarding the use of Cookies and mechanisms to store and access information, as required by law.

7. Changes to Privacy Policy

7.1. The Company reserves the right to, at any time, make changes or updates to the Privacy Policy, data safety and protection, and the relevant changes will be duly reported to the User through the Website, through a specific notice that will appear when using the Site. When legally required, the User will be asked to give their consent to said changes or updates. Refusing consent may mean, depending on the specific case, that it is impossible to access the Website.

7.2. In case of conflict between this Privacy Policy and those that may be published subsequently due to changes, the latter will prevail over the former.

VALIDITY AND COMMUNICATION

This policy comes into effect on December 2nd, 2025, is valid for 3 years and it may be subjected to interim review, if needed.

The Company will take measures so that all suppliers and service providers, as well as other recipients, are aware and understand the scope of this Policy, by sending it, in a timely manner, to each supplier and service provider, and publishing it both internally, as well as on the Company's website.

Vale de Cambra, December 2nd, 2025

The Board of Directors

