Privacy Policy



Purpose

As privacy is a fundamental right of citizens, enshrined in national and European legislation, the Ascendi Group (hereinafter referred to as "Ascendi" or the "Group") — whose structure is set out in Annex I to this Policy — is committed to protecting it in all aspects of its relationship with its customers, users, suppliers, partners, employees and any other data subjects, under the terms defined in its Personal Data Protection Policy and in strict compliance with the provisions in the national legislation on data protection and in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter "GDPR").

The purpose of the Privacy Policy is to disclose Ascendi's commitment to ensure the protection of the collected personal data, under the most appropriate conditions of confidentiality, availability and integrity, pursuant to the applicable legal standards and ensuring the trust of the data subjects.

In particular, this Privacy Policy regulates the collection and processing of personal data and the exercise of the rights concerning that data, ensuring the principles of transparency and information among data subjects and public opinion.

This Privacy Policy applies to the data processing carried out by the entities that make up the Group.

The electronic platforms under the Ascendi domain may contain links to websites and services of other entities that operate in accordance with their own privacy policies. When using such links, the specific privacy policy of the respective entity applies to the user. Ascendi is not responsible for any data processing carried out by third parties that are beyond its control.

This Privacy Policy should be read in conjunction with the website's Cookie Policy and the General Terms of Use of the Ascendi Portal.

Definitions

For the purposes of this Policy, the terms "Personal Data", "Processing", "Controller" and "Processor" have the meanings given in Article 4 of the GDPR, as follows:

- Personal data: information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person.
- Processing: is an operation or set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.
- Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

- Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Context

The Group is composed of several legal entities which, depending on their legal powers and responsibilities, carry out the processing of personal data. Responsibility for data processing varies according to the role assumed by each Group entity in the processing activity, particularly in determining the purposes and means of such processing.

The processing of personal data may be necessary in the context of operation and maintenance activities, as well as in the collection of tolls due for the use of concessioned road infrastructures. As a rule, circulation on a concessioned road involves the processing of personal data, which is required for compliance with the legal obligations to which the respective Group entity is subject, in accordance with sectoral legislation or the terms of the concession/sub-concession agreements. In such cases, the concessionaires or their assignees shall be responsible for the processing whenever they determine the purposes and means of the processing of personal data, or where such responsibility is established by law. When data processing is carried out by a processor, it shall be governed by a data processing agreement or contract, in accordance with Article 28 of the GDPR. The list of entities forming part of the Ascendi Group (Portugal) is attached to this Policy.

With regard to the processing of personal data related to toll collection activities, including those associated with the use of the Ascendi Portal and App, the Data Controller is Ascendi O&M, S.A.

Ascendi IGI – Inovação e Gestão de Infraestruturas, S.A. is the Data Controller in relation to research, development, commercialisation of products and the provision of services concerning the management, operation, maintenance, exploitation, and technical support of infrastructures and toll operations.

The Group entities have entered into an Intragroup Data Processing Agreement in order to regulate their respective responsibilities regarding data protection.

Information on Data Processing

1. Collection and processing of data

Ascendi collects and processes personal data exclusively for lawful purposes, in particular:

- Collection of outstanding toll charges and provision of related services, on the legal grounds of the toll collection legislation in force, namely Law 25/2006 of 30 June.
- Operation and maintenance of the roads under its management, on the legal grounds of compliance with the obligations arising from Concession, Sub-concession or Service Provision Contracts.

- Manage internal and external whistleblowing channels, analysing the communications submitted to them, in accordance with the principles of action and values established internally, especially transparency, integrity and compliance, and based on the whistleblower's consent and the applicable legislation and regulations, namely the general regime for the protection of whistleblowers established in Law 93/2021 of 20 December.
- Other commercial activities, including electronic communications, provided that the respective data subject's explicit consent has been given, pursuant to Article 6(1)(a) of the GDPR.

The personal data collected depends on the context of the interactions between the data subject and Ascendi, and may include the following, among others:

- Identification: name, taxpayer number (NIF); nationality, citizen card; driving license;
- Contacts: address / postal code / town or city / country; e-mail address; fixed and/or mobile phone number.
- Location data: tickets at charging locations;
- Video: Ascendi facilities or travelling through motorway networks;
- Voice: recording of calls;
- Vehicle data: registration / identifier / unique automobile document or equivalent;
- Data on outstanding payments: values of toll charges, administrative costs and fines;
- Billing data: Notification / Billing document / Invoice / Receipt;
- Payment details: payment method(s); payment authorization; payment history;
- Banking data: IBAN;
- Customer support data: contact history; contact preferences; copies or photographs of documents;
- Registration and browsing data: user/email; password; access and interaction logs through websites, portals, and mobile applications;
- Applications: CV; curricular information, professional experience, training and other;
- Complaints: content of the complaint; relationship with Ascendi; support information; Optional: name; e-mail.

Ascendi will only process personal data to the extent strictly necessary for the performance of its activities, in accordance with the appropriate legal basis for such processing. This includes, but is not limited to, situations where personal data are required for compliance with legal obligations to which Ascendi is subject, for the performance of a contract to which the data subject is a party, based on the data subject's consent, or for the pursuit of legitimate interests, provided that such interests do not override the interests or rights of the data subjects.

Ascendi assumes that the collected personal data was provided by the respective data subject or that its provision was authorised by the data subject, and that they are true, updated and accurate, without prejudice to the data subject's possibility of exercising the right to their rectification.

2. Data Transfer

Ascendi may transmit personal data to third parties provided that the data subject's prior consent has been obtained to this end, or else when, pursuant to the law:

- The transmission is carried out in the context of compliance with a legal obligation, resolution or authorisation of the National Data Protection Commission or court order;
- The disclosure is carried out to protect the vital interests of users or any other legitimate purpose established in the law;
- Ascendi subcontracts other entities for the provision of services in order to enable the operationalisation of internal processes and obligations, namely contractual, tax-related or legal;
- The personal data processing corresponds to a legitimate interest of Ascendi or third parties, unless the interests or fundamental rights and freedoms of the data subject prevail.

When there are legal grounds for transmission of the user's personal data to third parties, Ascendi guarantees that these entities' access to the collected information shall be limited to that required to pursue the legitimate specific purpose.

The transfer of personal data, as described in this Privacy Policy, does not typically include the international transfer of personal data to countries outside the European Economic Area, except in specific situations, such as when justified by the subcontracting of international services, such as cloud services. In such cases, transfers may be made to an international organization, provided that an adequate level of protection is ensured.

The personal data collected in the context of toll collection services may be shared for processing with the same purposes with concessionaires, sub-concessionaires, or any road infrastructure operators for whom Ascendi provides toll collection services, in accordance with the terms set out in the respective contracts or data processing agreements concluded between the Parties.

In the context of the project for interlinking toll collection portals, designed to allow users, on a single platform, to voluntarily and comprehensively view all outstanding tolls to facilitate their payment, the joint controllers, pursuant to Article 26(1) of the GDPR, are Vialivre, S.A., Ascendi O&M S.A., Portvias – Portagem de Vias, S.A., and Via Verde Portugal – Gestão de Sistemas Eletrónicos de Cobrança, S.A. (jointly referred to as the "Joint Controllers"). In the event of payment being made in a single transaction on the consultation portal, Vialivre, S.A., and Ascendi O&M act as joint controllers for processing.

For the relevant purposes, the Controllers have signed a joint controller agreement under the provisions of Article 26(1) of the GDPR, which establishes their respective responsibilities. The essence of this agreement, in accordance with paragraph 2 of the aforementioned article, can be consulted here.

3. Storage and retention

If there is no legal term of retention, the data is stored and kept only for the minimum period required for the purposes for which they were collected and subsequently processed, after which they shall be treated appropriately, without prejudice to their retention beyond that period where required by a legal obligation, court order, or when necessary to demonstrate compliance with contractual or other obligations.

Ascendi stores personal data in systems that are in a secure environment, protected from unauthorised access or misuse.

Ascendi is responsible for the systems that process personal data and their repositories, which are located in European Union countries.

4. Right of Data Subjects

Ascendi ensures that data subjects may exercise their rights pursuant to the GDPR, in particular the right of access, the right to rectification, the right to erasure, the right to object, the right to restrict processing, the right to data portability, the right not to be subject to automated decisions, and the right of representation.
In order to exercise these rights, the data subject may choose one of the following channels provided by Ascendi for the purpose:

- Ascendi's website, by submitting the form available at https://portal.ascendi.pt/apoio-a-clientes, option Personal Data Processing -> Exercise my rights.
- E-mail to the address dataprotection@ascendi.pt;
- Letter addressed to the Ascendi Data Protection Officer - C/O Ascendi's Data Protection Officer, Edifício Litografia Lusitana, Praça Mouzinho de Albuquerque, 197, 4100-360 Porto, Portugal;
- In person by completing the form in paper format available during business hours at the Ascendi customer service office located at Rua de Agramonte 130, Porto, Portugal.

Data subjects may contact the Ascendi Data Protection Officer, without prejudice to also being able to exercise their right to submit a complaint with the National Data Protection Commission, using the contacts provided for the effect by that entity.

5. Data Security

Ascendi does its utmost to protect the personal data it collects or processes against unauthorised access, loss or misuse. To this end, Ascendi implements suitable logical, physical and organisational measures, which are deemed necessary and sufficient to protect personal data against destruction, loss, alteration, dissemination, unauthorised access or any other form of accidental or unlawful treatment. The measures taken by Ascendi include the implementation of appropriate access controls and the encryption, pseudonymisation and anonymisation of personal data, whenever possible.

Access to personal data by non-data subjects is only allowed under the terms described below, exclusively on a need-to-know basis, and, when processed by third parties, preceded by subjection to strict contractual confidentiality obligations.

When the access is established via electronic means, the user is responsible for ensuring that the terminal being used (computer smartphone, etc.) is adequately protected against harmful software, computer viruses and worms. Furthermore, the user is responsible for taking adequate computer security measures (e.g., secure browser configuration, use of up-to-date antivirus software, security barrier software and non-use of software of doubtful origin), without which the risk of personal data and passwords being accessed by unauthorised third parties is enhanced.

6. Changes to the Privacy Policy

Ascendi reserves the right to modify the Privacy result of new legislative and/or regulatory requirements, for security reasons or for the purpose of adapting this Policy to the instructions of the data protection control authorities.

Any change shall be disclosed immediately via the appropriate channels and referenced through the version number and date of update.

If the change to the Privacy Policy directly affects the consent given by the data subjects, Ascendi shall request a new consent for the processing of their personal data in accordance with the new Privacy Policy.

ANNEX I – Ascendi Group of Companies (Portugal)

Entity	Tax Identification Number	Headquarters	Activity	Responsibilities for Data Processing Operations	Contact
Ascendi, S.G.P.S., S.A.	513484558	Porto - Portugal	Shareholdings Manager	Data Controller in the context of shareholding management	dataprotection@ascendi.pt
Ascendi Norte - Auto Estradas do Norte, S.A.	504488643	Porto - Portugal	Highway Concessionaire	Data Controller in relation to the Norte Concession network	dataprotection@ascendi.pt
Ascendi Operadora NT - Operação e Manutenção Rodoviária, S.A.	504488635	Porto - Portugal	Highway Operator	Processor of operation, management, and maintenance services for the Norte Concession network	dataprotection@ascendi.pt
Ascendi Costa de Prata - Auto Estradas da Costa de Prata, S.A.	504853694	Aveiro - Portugal	Highway Concessionaire	Data Controller in relation to the Costa de Prata Concession network	dataprotection@ascendi.pt
Ascendi Operadora CP - Operação e Manutenção Rodoviária, S.A.	504853686	Aveiro - Portugal	Highway Operator	Processor of operation, management, and maintenance services for the Costa de Prata Concession network	dataprotection@ascendi.pt
Ascendi Beiras Litoral e Alta - Auto Estradas das Beiras Litoral e Alta, S.A.	505403900	Viseu - Portugal	Highway Concessionaire	Data Controller in relation to the Beiras Litoral e Alta Concession network	dataprotection@ascendi.pt
Ascendi Operadora BLA - Operação e Manutenção Rodoviária, S.A.	505403927	Viseu - Portugal	Highway Operator	Processor of operation, management, and maintenance services for the Beiras Litoral e Alta Concession network	dataprotection@ascendi.pt
Ascendi Grande Porto - Auto Estradas do Grande Porto, S.A.	506252043	Porto - Portugal	Highway Concessionaire	Data Controller in relation to the Grande Porto Concession network	dataprotection@ascendi.pt
Ascendi Operadora GP - Operação e Manutenção Rodoviária, S.A.	506252051	Porto - Portugal	Highway Operator	Processor of operation, management, and maintenance services for the Grande Porto Concession network	dataprotection@ascendi.pt
Ascendi Grande Lisboa - Auto Estradas do Grande Lisboa, S.A.	507959248	Sintra - Portugal	Highway Concessionaire	Data Controller in relation to the Grande Lisboa Concession network	dataprotection@ascendi.pt
Ascendi Operadora GL - Operação e Manutenção Rodoviária, S.A.	507939590	Sintra - Portugal	Highway Operator	Processor of operation, management, and maintenance services for the Grande Lisboa Concession network	dataprotection@ascendi.pt
Ascendi Pinhal Interior, Estradas do Pinhal Interior, S.A.	509397913	Ansião - Portugal	Highway Concessionaire	Data Controller in relation to the Pinhal Interior Sub-concession network	dataprotection@ascendi.pt
Ascendi Operadora PI, Operação e Manutenção Rodoviária, S.A.	509397891	Ansião - Portugal	Highway Operator	Processor of operation, management, and maintenance services for the Pinhal Interior Sub-concession network	dataprotection@ascendi.pt
Ascendi O&M, S.A.	508677688	Porto - Portugal	Toll Operation and Collection	Data Controller or Processor in relation to toll operation and collection services	dataprotection@ascendi.pt
Ascendi IGI - Inovação e Gestão de Infraestruturas, S.A.	509770118	Porto - Portugal	Transport Infrastructure Management	Data Controller or Processor in relation to transport infrastructure management services	dataprotection@ascendi.pt
Ascendi Serviços de Assessoria, Gestão e Operação, S.A.	508677467	Porto - Portugal	Management and Advisory Services	Data Controller or Processor in relation to the services provided	dataprotection@ascendi.pt
Ascendi Invest., S.A.	513489991	Porto - Portugal	Other Support Services	Data Controller or Processor in relation to the services provided	dataprotection@ascendi.pt

6 October 2025