

Data Protection and Privacy Policy

1. Introduction

Transfrio – Transportes Rosália, Lda., a legal entity registered under number 503001295, with its registered office at Rua do Funchal, no. 70, 2670-364 Loures, is committed to protecting the personal data of all individuals with whom it maintains relationships, including employees, drivers, customers, suppliers, subcontractors, business partners, and other stakeholders.

This Data Protection Policy establishes the principles, rules, responsibilities, and practices adopted by Transfrio to ensure that personal data processing is carried out in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR) and Law No. 58/2019, which ensures its implementation in Portugal.

Transfrio recognizes that data protection is essential to trust, credibility, and transparency in its activities, particularly in the context of logistics, national and international transport, storage, and distribution. This policy applies to all personal information collected, stored, used, or shared during the company's operations

2. Scope

This Policy applies to all personal data processing activities conducted by Transfrio, regardless of the format (digital or physical), location (facilities, road operations, external platforms), or technological means used. It also applies to all employees, suppliers, and subcontractors who, in the provision of services to Transfrio, may access personal data.

It includes the processing of personal data in the context of:

- transport and logistics services (national and international);
- administrative and commercial management;

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- issuance, management, and achieving transport documents (CMR, delivery notes, proofs, manifests);
- vehicle tracking and geolocation;
- video surveillance at company facilities.
- electronic communication and digital platforms.
- recruitment, selection, training, and employee management processes.
- contractual relationships with suppliers and subcontractors.
- physical and digital security of the company.

This Policy is intended for all stakeholders: internal employees, drivers, customers, suppliers, subcontractors, visitors, auditors, business partners, authorities, and any entity involved in Transfrio's operations.

3. Principles of Personal Data Processing

Transfrio ensures that all personal data is processed in accordance with the following fundamental GDPR principles:

- **Lawfulness, fairness, and transparency:** Processing is carried out in a clear, informed manner and based on appropriate legal grounds.
- **Purpose limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- **Data minimization:** Only data strictly necessary to fulfill the defined purposes is collected.
- **Accuracy:** Personal data is kept accurate and up to date and corrected or deleted when necessary.
- **Storage limitation:** Data is retained only for the period necessary to comply with legal or operational obligations.

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- **Integrity and confidentiality:** Appropriate technical and organizational measures are implemented to ensure data security and prevent unauthorized access.
- **Accountability:** Transfrio documents and demonstrates compliance with GDPR principles and obligations.

4. Categories of Personal Data Processed

Depending on the relationship established, Transfrio may process various categories of personal data, namely:

- Identification data (name, address, contacts, tax identification number, ID card/passport);
- Professional data (roles, working hours, training, skills, evaluations, certificates);
- Driver data (identification, documentation, assigned routes, driving and loading/unloading records);
- Customer and recipient data (name, contacts, delivery addresses);
- Supplier and subcontractor data (business and personal identification, contacts, identification of external drivers);
- Financial and contractual data (IBAN, invoicing, accounting documents);
- Geolocation data resulting from vehicle tracking during service provision;
- Video surveillance data recorded at company facilities;
- Digital data collected through the website or electronic communications (cookies, logs, forms).

In all cases, Transfrio ensures that only data strictly necessary for the intended purposes is collected and processed.

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5. Purposes of Processing

Personal data is collected exclusively for purposes related to service provision, administrative management, and compliance with legal obligations, including:

- execution of transport, storage, and logistics contracts;
- management of loads, unloading, routes, documentation, and tracking;
- issuance and archiving of CMRs, transport documents, invoices, and proofs;
- management of contact with customers, suppliers, and subcontractors;
- commercial management and customer relations;
- human resources management (recruitment, contracts, training, evaluations);
- compliance with tax, customs, labor, and road safety obligations;
- security of facilities and goods through video surveillance;
- prevention and management of operational incidents and data breaches;
- communication and response to requests from competent authorities.

Transfrio does not use personal data for undisclosed or unauthorized purposes and does not sell or provide data to third parties for commercial purposes.

6. Legal Bases for Processing

Personal data processing carried out by Transfrio is based, as applicable, on:

- performance of a contract, including transport, logistics, or employment contracts;
- compliance with legal obligations, including tax, labor, customs, transport, and road safety regulations;
- legitimate interest, such as fleet management, operational security, video surveillance, service improvement, or fraud prevention;
- consent of the data subject, when required and applicable.

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- establishment, exercise, or defense of legal claims.

7. Recipients of Personal Data

Transfrio may disclose personal data to the following categories of recipients, strictly in compliance with GDPR and only when necessary:

- public entities and competent authorities (Tax Authority, police authorities, customs authorities, road authorities);
- insurers, legal advisors, accountants, and auditors;
- suppliers and subcontractors essential to transport execution;
- logistics operators, freight forwarders, and international transport partners;
- technical and technological service providers (maintenance, IT, servers, management software);
- affiliated companies that comply with equivalent data protection policies.

All subcontractors processing data on behalf of Transfrio are bound by data processing agreements in accordance with Article 28 of the RGPD.

8. International Data Transfers

In the case of international transport or systems hosted outside the EEA, Transfrio ensures that international data transfers comply with:

- European Commission adequacy decisions;
- Standard Contractual Clauses (SCCs);
- supplementary measures approved by the EDPB;
- appropriate organizational and technical safeguards.

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Where necessary, data subjects will be informed about such transfers

9. Security Measures and Limitations

Transfrio adopts a structured set of technical and organizational security measures to protect personal data against loss, alteration, destruction, disclosure, or unauthorized access, including:

- physical and digital access controls;
- data encryption and password protection of confidential files;
- use of servers with active SSL certificates;
- firewall and antivirus systems;
- regular backups;
- restricted printing and secure physical archiving;
- continuous training of employees and drivers;
- internal policies on email and mobile device usage.

Despite these measures, Transfrio acknowledges that no security system can guarantee absolute protection due to the evolving nature of technological threats. However, all reasonable practices are adopted to minimize risks.

10. Data Retention Period

Personal data is retained only for the period strictly necessary for the purposes for which it was collected, including legal, contractual, and regulatory obligations. Indicatively:

- transport documentation (CMR, delivery notes, proofs): up to 10 years (tax obligation);
- employment data: applicable legal period (between 5 and 10 years depending on document type);
- commercial and financial data: 10 years;

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- video surveillance data: up to 30 days, unless incidents occur;
- candidate data: up to 2 years;
- customer and supplier data: for the duration of the contractual relationship plus applicable legal limitation periods.

Whenever possible, data will be anonymized or securely deleted after the retention period expires.

11. Data Subject Rights

Transfrio ensures the exercise of GDPR data subject rights. Data subjects have the right to:

- access their personal data;
- request rectification of inaccurate or incomplete data;
- request data erasure (“right to be forgotten”), under legally applicable conditions;
- restrict processing;
- object to processing based on legitimate interest;
- request data portability;
- be informed about automated decision-making (if applicable);
- lodge a complaint with the Portuguese Data Protection Authority (CNPD).

Requests must be addressed to the contact provided at the end of this document and will be assessed and answered within legal deadlines.

12. Personal Data Breaches

In the event of a personal data breach, Transfrio has internal procedures in place to detect, assess, and promptly address the incident. Where required, the company will notify the CNPD and affected data subjects in accordance with Articles 33 and 34 of the GDPR.



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Subcontractors must report incidents within a maximum of 24 hours after detection

13. Data Protection Contact

To exercise rights or request clarification regarding data processing, data subjects may contact:

Transfrio – Transportes Rosália, Lda.

Rua do Funchal, n.º 70

2670-364 Loures

📞 213 032 435

✉️ [Inserir email oficial para RGPD]

Additional information on data protection may be obtained from the Portuguese Data Protection Authority (CNPD):

📍 Rua de São Bento 148, 3.º, 1200-821 Lisboa

📞 +351 213 928 400

✉️ geral@cnpd.pt

🌐 www.cnpd.pt

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