

Privacy notice

This Privacy notice aims to help you understand how Moloni handles your personal data when you visit our website.

Reference: GDPR-DOC-AVPR

Version: 1.0 **Date:** 13/08/2025

Classification: Available to subscribers and supervisory authorities

Roles and responsibilities

The Moloni ON website is managed by Moloni Unipessoal, Lda., which is also the data controller for personal data collected during your visit and use.

Contact us

If you have any comments or questions about our Privacy notice, or any privacy concerns, including possible breaches, please contact us at apoio@molonion.pt.

If you wish to contact the Moloni Data Protection Officer, please email dpo@moloni.pt.

You can also contact our headquarters at: Av. José Malhoa, Edifício Malhoa Plaza, Escritório

No. 1.5, 1070-325 Lisboa

Phone number: (+351) 211 450 112



Processing activities

Use of cookies

Please access our Cookie Policy to see the full list of cookies we use on the www.molonion.pt website, including the storage time of each cookie, the recipient of the cookie data and the respective purpose of data processing.

In accordance with the ePrivacy Directive and the national legislation that implements it, cookies will not be applied unless you consent to them by interacting with the cookie banner that will appear on your first visit to our website, with the exception of cookies strictly necessary for its correct functioning. The said consent is opt-in in accordance with the "Planet-49" decision of the CJEU.

The subsequent processing of data collected by cookies, which includes personal data such as cookie ID, IP address, website activity such as clicks and similar, has its lawfulness based on legitimate interests, cf. GDPR article 6, paragraph 1, subparagraph f). The underlying legitimate interest is to analyse and improve the functionality and content of our website.

Managing requests

To facilitate communication and support for our website visitors, we handle questions and concerns received by email. This processing involves the personal data you provide in your request, which at a minimum includes your contact details.

The lawfulness of this personal data processing is based on legitimate interests, cf. GDPR article 6, paragraph 1, subparagraph f). The underlying legitimate interest is to respond to questions and concerns raised by our website visitors.

Requests and related correspondence are stored only for as long as necessary to fulfil the purpose of the processing.

Newsletter subscriptions

You can subscribe to the Moloni ON newsletter. If you subscribe, we will only process your name and email address for this purpose.

Our legal basis for this personal data processing is also based on legitimate interests, in this case, to provide news about Visma to interested individuals, cf. GDPR article 6, paragraph 1, subparagraph f).

The personal data will be deleted when you unsubscribe from the newsletter. You can unsubscribe by clicking "Unsubscribe" at the bottom of the emails.



Recruitment

We publish open positions at Moloni on our website. Our company uses different tools to manage the recruitment process, and you may also find dedicated privacy notices within these tools. Moloni manages the recruitment process and is the controller for any personal data received in this relationship.

Improving the service on the website

We continuously strive to improve and develop the quality, functionality, and user experience of our websites. The personal data we process includes user and web traffic information, such as session ID, IP address, and access terminal information.

The lawfulness for the processing of your personal data is based on legitimate interests, cf. GDPR article 6, paragraph 1, subparagraph f). The legitimate interest is to ensure that we meet the expectations of our visitors.

We will store your personal data only for as long as necessary to fulfil the purpose of the processing, and your personal data will be deleted after three years.

Website security

We also process personal data to detect, mitigate, and prevent security threats and abuse, as well as to carry out necessary maintenance and debugging. The personal data involved includes user and web traffic data, such as session ID, IP address, and device information.

The lawfulness for this personal data processing is also based on legitimate interests, cf. GDPR article 6, paragraph 1, subparagraph f). The legitimate interest is to maintain a secure website.

We will store your personal data only for as long as necessary to fulfil the purpose of the processing, and your personal data will be deleted after one year.



How your personal data may be shared Within the Visma group

The Visma Group, of which Moloni Unipessoal, Lda. is a part, consists of several subsidiaries. To ensure a coherent overview and consistent learnings within an integrated knowledge framework, we may share your personal data among the companies in the Visma Group. The intention is to optimise operations and provide you with a more integrated and continuous experience.

Outside the Visma Group

We may also share your personal data with external third parties, with sharing limited to the following contexts:

Sub-contractors

We use sub-contractors to process personal data. These sub-contractors are typically cloud-based service providers. When we use sub-contractors, we enter into a data processing agreement to safeguard your privacy rights. If the sub-contractors are located outside the EU/EEA, we ensure the legal basis for such international transfers on your behalf, for example, by implementing the EU's Standard Contractual Clauses. If you need more detailed information about our sub-contractors, please contact us as described in the "Contact Us" section.

Public authorities

The police and other authorities may request access to information from us. This may include personal and non-personal data.

Furthermore, we ensure legal obligations in contracts with our sub-contractors that guarantee they also implement organisational and security measures similar to our own.

If we receive access requests from authorities outside the EEA, we ensure our compliance with Article 32 of the Data Act. Our internal policies and routines are in compliance with this regulation.

Your rights

You can invoke the following rights in relation to our processing of your personal data:

- Access You have the right to request a copy of the personal data we process about you;
- Rectification You also have the right to request the rectification of inaccurate personal data concerning you;
- **Erasure -** You can request the erasure of personal data concerning you;
- Restriction You can ask us to restrict the processing of your personal data;
- Portability You can ask us to provide you or others with your personal data in a structured, commonly used, and machine-readable format;



Objection - You have the right to object to the processing of your personal data based on legitimate interests or for direct marketing purposes. You also have the right to object to the processing of your personal data based on public interest, the exercise of official authority, or legitimate interests.

Please note that there may be certain exceptions or limitations to the rights mentioned above, which may be applicable depending on the specific circumstances of your situation. In such cases, we will provide detailed information about the applicable exception or limitation and will help you to exercise your rights to the greatest extent possible, in accordance with the applicable laws and regulations.

Finally, you also have the right to lodge a complaint with the data protection authorities regarding our processing of your personal data.