



**Data Protection Policy
CIRSA Group**

Data Protection Committee
2023



TABLE OF CONTENTS

1.	PURPOSE	2
2.	SCOPE OF APPLICATION.....	2
3.	PRINCIPLES TO BE COMPLIED WITH WITHIN THE CIRSA GROUP IN THE PROCESSING OF PERSONAL DATA	2
	➤ General principles.....	2
	➤ Principles of legitimacy, lawfulness and fairness in the processing of personal data	3
	➤ Principle of minimization.....	3
	➤ Principle of accuracy	3
	➤ Principle of limitation of the retention period.....	4
	➤ Principle of integrity and confidentiality	4
	➤ Principle of accountability	4
	➤ Principles of transparency and information.....	5
	➤ Acquisition or obtaining of personal data	5
	➤ Hiring of data processors	5
	➤ International data transfers	6
	➤ Rights of data subjects.....	6
4.	IMPLEMENTATION	6
5.	MONITORING AND EVALUATION	7

1. PURPOSE

The Board of Directors of the CIRSA Group is responsible for formulating the Compliance strategy and approving the corporate policies of the companies that make up the CIRSA Group ("**CIRSA Group**", the "**Company**" or "**CIRSA**"). Likewise, it has also assumed the responsible commitment of the continuous management of the potential risks associated with the processing of data from its design within the framework of the activity of each of the companies of the CIRSA Group. In the exercise of these responsibilities and in order to establish the general principles that should govern the processing of personal data, within the meaning established by the regulations and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and by which repeals Directive 95/46/EC (hereinafter, the "**RGPD**"), the Board of Directors of the CIRSA Group approves this Personal Data Protection Policy.

This Corporate Policy for the Protection of Personal Data establishes the principles and guidelines for action that must govern the CIRSA Group in terms of personal data protection, guaranteeing, in any case, compliance with the applicable legislation in force. In particular, the Personal Data Protection Policy aims to guarantee the right to the protection of their data of all natural persons who relate to the companies of the CIRSA Group, ensuring respect for the right to honour, privacy, and intimacy in the processing of different types of personal data, from different sources and for different purposes depending on their business activity.

2. SCOPE OF APPLICATION

The Corporate Policy for the Protection of Personal Data will apply to all the companies of the CIRSA Group, to the personnel of the companies that comprise it, to their administrators, managers and employees, as well as to all persons external to them who relate to the companies of the CIRSA Group, regardless of the legal nature of the link that unites them with them, such as, for example, customers, suppliers or collaborators.

3. PRINCIPLES TO BE COMPLIED WITH WITHIN THE CIRSA GROUP IN THE PROCESSING OF PERSONAL DATA

➤ **General principles**

The CIRSA Group will comply scrupulously in each country in which it operates with the current legislation on data protection, both the specific data protection legislation, as well as the one that is applicable derived from its sectoral regulation, in each case, and the own regulations that are adopted internally within this Company with

binding character. Thus, CIRSA Group must not only comply with the provisions of the RGPD, but by way of example, for Spain it must also comply with the provisions of Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (hereinafter, the "LOPD") and the provisions of the Control Authority, the Spanish Agency for Data Protection, through its Instructions, Guides and Recommendations (www.aepd.es).

The CIRSA Group will promote that the principles contained in this Personal Data Protection Policy are taken into account in the design and implementation of all procedures within the framework of its activity that involve the processing of personal data: the provision of its services to business customers and final consumer customers; the contracting of suppliers, the signing of contracts with business clients and collaborators and auxiliaries; the choice and implementation of any systems and technological platforms that allow access by its staff or third parties to personal data and/or the collection or processing of such data, etc.

➤ **Principles of legitimacy, lawfulness, and fairness in the processing of personal data**

CIRSA will ensure that **the processing of personal data under its responsibility is fair, legitimate, and lawful in accordance with the applicable legislation.** In this sense, personal data must be collected for one or more specific and legitimate purposes in accordance with the applicable legislation.

CIRSA must always process the personal data of the interested parties on the appropriate legitimizing bases that correspond to each treatment and purpose, according to the provisions of article 6 of the RGPD. In cases where it is mandatory in accordance with the provisions of the RGPD and the LOPD, the Company will obtain the consent of the interested parties before collecting their data and will ensure that such consent is valid.

Likewise, CIRSA will specify in its respective privacy policies in an explicit and determined way the purposes of the treatments for which it collects the personal data of the interested parties at the time of its collection.

➤ **Principle of minimization**

CIRSA will analyse the treatments that will be carried out with the personal data of the interested parties to ensure that **only those personal data that are strictly necessary for the purpose for which they are collected or processed and appropriate for that purpose will be processed.**

➤ **Principle of accuracy**

The companies of the CIRSA Group will ensure that **the personal data are accurate and updated,** and must apply the appropriate cleaning, rectification and updating of databases.

Likewise, the companies of the CIRSA Group will adopt the appropriate personal data deletion policies, in accordance with the data processing they carry out within the framework of their activities.

➤ **Principle of limitation of the retention period**

The companies of the CIRSA Group, as Responsible for their treatment activities, will document and implement the appropriate conservation policies in order to guarantee that **personal data are not kept beyond the period necessary to achieve the purpose for which they were collected**, except in the cases provided for by law, in which case they will keep them duly blocked as established in article 32 of the LOPD.

➤ **Principle of integrity and confidentiality**

In the processing of personal data, **the companies of the CIRSA Group must guarantee, through technical or organizational measures, adequate security that protects them from unauthorized or unlawful processing and that prevents their loss, destruction, and accidental damage.**

The personal data collected and processed must be kept with the utmost confidentiality and secrecy and may not be used for purposes other than those that justified and allowed its collection and without being communicated or transferred to third parties outside the cases allowed by the applicable legislation.

➤ **Principle of accountability**

The companies of the CIRSA Group will be responsible for complying with the principles stipulated in this Personal Data Protection Policy and those required in the LOPD, the RGPD and must be able to demonstrate it, when required by applicable legislation.

The companies of the CIRSA Group must keep a register of activities describing the processing of personal data carried out within the framework of their activities, including the information required by Article 30 of the RGPD.

The companies of the CIRSA Group must carry out a basic analysis of the risks posed to the rights and freedoms of the interested parties by the processing of their personal data to identify them in advance and manage them properly.

In cases where the regulations so require, the companies of the CIRSA Group must carry out a risk assessment of the treatments they carry out, to determine the measures to be applied to ensure that personal data are processed in accordance with legal requirements. Thus, they will previously evaluate the risks that new services, products, commercial actions, or

technologies may entail for the protection of personal data and the necessary measures will be adopted to eliminate or mitigate them.

In the event of an incident that causes the destruction, loss or accidental or unlawful alteration of personal data, or unauthorized communication or access to such data, the companies of the CIRSA Group must follow the internal protocols established for this purpose, as well as those established by the applicable legislation. Such incidents should be documented, and measures taken to address and mitigate any negative effects on stakeholders.

The CIRSA Group has appointed, as established by the RGPD and the LOPD, among other applicable regulations, a Data Protection Delegate Committee operational for all the companies of the CIRSA Group (protecciondedatos@cirsa.com), in order to offer advice, supervise and guarantee compliance with data protection regulations in the Company.

➤ **Principle of transparency and information**

The companies of the CIRSA Group will ensure that the processing of personal data is transparent in relation to the interested party, providing information on the processing of their data in an understandable and accessible way, when required by applicable regulations.

To guarantee fair and transparent treatment, in their capacity as data controllers, the companies of the CIRSA Group must inform the affected or interested parties whose data is intended to be collected of the circumstances related to the treatment in accordance with the applicable legislation through the appropriate privacy policy.

➤ **Acquisition or obtaining of personal data**

It is forbidden to acquire or obtain personal data from illegitimate sources, from sources that do not sufficiently guarantee their legitimate origin or from sources whose data have been collected or transferred in contravention of the regulations.

➤ **Hiring of data processors**

Prior to hiring any service provider that accesses personal data that are the responsibility of any of the companies of the CIRSA Group, as well as during the term of the contractual relationship, **it must adopt the necessary measures to guarantee and, when legally required, demonstrate that the data processing by the person in charge is carried out in accordance with the applicable regulations**, implementing the procedure for homologating suppliers with access to personal data enabled for this purpose and mandatory for all CIRSA Group companies.

➤ **International data transfers**

Any processing of personal data subject to European Union regulations that involves a transfer of data outside the European Economic Area must be carried out in strict compliance with the requirements established in the RGPD and the LOPD. Likewise, the Company will ensure that the third party located outside the European Economic Area complies with the requirements established for international transfers of personal data that are, where appropriate, applicable in its jurisdiction.

➤ **Rights of data subjects**

The Company must allow the interested parties to exercise the rights recognized by the RGPD, that is, access, rectification, deletion, limitation of treatment, portability and opposition that apply in each jurisdiction, establishing, for this purpose, the internal procedures that are necessary to guarantee their correct management.

4. IMPLEMENTATION

In accordance with the provisions of this Personal Data Protection Policy, the Board of Directors of the CIRSA Group will approve and update the internal data protection management regulations, which will be always mandatory for all managers and employees of the Company in their version in force.

The companies of the CIRSA Group will ensure that the Executive Committee on Data Protection participates in an appropriate and timely manner in all matters relating to the protection of personal data.

The Data Protection Executive Committee will advise on compliance with data protection regulations within the CIRSA Group, informing the data controller and its employees on how to apply the personal data protection regulations and supervising their effective application. In addition, the Delegated Committee for Data Protection will be, where appropriate, the contact figure by the person responsible for the treatment with the control authority and the holders of the personal data.

The Data Protection Delegate Committee will be responsible for reporting to the Compliance Body of the CIRSA Group of the developments and regulatory developments that occur in this area.

The companies of the CIRSA Group, with the appropriate participation of the Delegated Committee on Data Protection, are responsible for implementing in the Company's information systems, the controls and computer developments that are appropriate to guarantee compliance with internal data protection management regulations and will

ensure that these developments are updated to guarantee the best achievement of the effective implementation of the RGPD and the LOPD in within the CIRSA Group.

5. MONITORING AND EVALUATION

➤ Control

It is the responsibility of the Executive Committee for Data Protection to supervise compliance with the provisions of this Personal Data Protection Policy by the Company. The foregoing shall be understood, in any case, without prejudice to the responsibilities that correspond to other bodies and addresses of the Company. To verify compliance with this Personal Data Protection Policy, periodic controls and audits will be carried out as deemed appropriate.

➤ Evaluation

The Executive Committee on Data Protection will evaluate, at least once a year, compliance and effectiveness of this Personal Data Protection Policy and will always report the result to the Compliance Body of the CIRSA Group in force.