



**PRISA GROUP**

# **GENERAL DATA PROTECTION POLICY**

July 2022



## GENERAL DATA PROTECTION POLICY OF THE PRISA GROUP

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#### Changes from previous edition

First version of this POLICY.

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## 1. INTRODUCTION

This policy implements article 12.3 of the PRISA Group Code of Ethics, which provides as follows in relation to the processing of personal data:

*“The PRISA Group pays particular attention to protecting the right to privacy, protecting the personal data entrusted to it by its customers, partners, suppliers, collaborators, contractors, employees, institutions and the general public. PRISA Group Professionals will not collect, process, store, retain, communicate, reveal or use any data to which they have access in the course of their duties in the Group in any way that breaches the requirements set down in legislation, international agreements and internal regulations relating to personal data protection.”*

Therefore, the PRISA Group has prepared this policy in order to express the Management's strongest commitment to the protection of personal data, to ensure compliance with current regulations and manage privacy issues further to the goal of fostering a culture of ethics and integrity in business.

Any internal procedure or rule defined in the Group in the area of personal data protection shall be based on the principles and commitments set out in this general policy.

## 2. PURPOSE

The purpose of this General Data Protection Policy, in addition to declaring the commitment of the organisation and, in particular, of its governing bodies and senior management to respect the protection of personal data, is to establish the data protection principles and commitments that PRISA follows with the ultimate aim of safeguarding the fundamental rights and freedoms of the persons who have dealings with PRISA and whose data are processed by the companies that form part of the Group.

This high-level policy must be supplemented by the relevant internal rules in accordance with the applicable legislation in each jurisdiction.

## 3. SCOPE OF APPLICATION

This high-level policy shall apply to PRISA and to all the companies in the Group, as well as to the investee companies over which PRISA has effective control. This policy is therefore binding on all Professionals of the PRISA Group.

## 4. EFFECTIVENESS

This policy comes into force as from the date of its approval by the Board of Directors held on 26 July 2022, following a favourable report from the Nominations, Compensation and Corporate Governance Committee.

## 5. IMPLEMENTATION OF THE DATA PROTECTION POLICY

### Principles

The provisions set out in this policy are based on the standards and best practices of respect for the privacy of individuals and are based on the principles set out in Regulation (EU) 2016/679 of the European Parliament and of the European Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data.

In this regard, PRISA guarantees that:

- i. The data will be processed lawfully, fairly and transparently. There must be a legitimate basis for processing and the data subjects will be clearly informed of the purposes and circumstances in which their data will be processed.
- ii. The data shall be processed for specific, explicit and legitimate purposes.
- iii. The data processed shall be those that are necessary for the purposes specified.
- iv. The data processed shall be accurate and, if necessary, shall be updated.
- v. The data processed shall be kept for the time needed to achieve the purposes of the processing.
- vi. Appropriate security measures will be applied to the data to try to prevent unauthorised or unlawful processing, or the intentional or accidental destruction, loss or damage of the data.

### Commitments

This policy sets out the commitment of PRISA Management embodied in the following obligations to:

- Watch over and ensure compliance with applicable regulations, as well as with contractual requirements relating to data protection and to be able to demonstrate this when so required by the applicable legislation.

- Assign the necessary roles and responsibilities in the area of privacy and allocate the necessary resources.
- Ensure compliance with data protection principles, ensuring respect for the applicable law and data subjects' rights.
- Ensure that every security incident or breach is dealt with appropriately and, if necessary, communicated to those potentially affected, as well as to the relevant regulatory bodies.
- Implement security measures appropriate to the risks detected and analysed by the organisation.
- Train, raise awareness and motivate staff on the importance of complying with privacy requirements.

## **6. UPDATES AND COMPLIANCE CHECKS**

Compliance with this policy may be monitored by PRISA through appropriate internal monitoring and control processes.

This policy will be reviewed on an ordinary or extraordinary basis, as provided for in the Group's regulatory review processes, so that it can be adapted to the circumstances in which the processing of personal data is carried out, with a view to ensuring continuous improvement.