

I. PERSONAL DATA PROTECTION POLICY

LARRENO, SL (the “Company”) is an Organization in which personal data processing activities occur, which gives it an important responsibility in the design and organization of procedures so that they are aligned with legal compliance in this area.

In the exercise of these responsibilities and in order to establish the general principles that should govern the processing of personal data in the Company, approves this Policy of protection of personal data, which notifies its Employees and makes available of all its Interest groups.

1. Purpose

The Policy of protection of personal data is a measure of *proactive Responsibility* that has the purpose of ensuring compliance with applicable legislation in this area and in relation to it, respect for the right to honor and privacy in the processing of data of a personal nature of all the people that relate to the Company.

In development of the provisions of this Personal Data Protection Policy, the Principles governing the processing of data in the organization and, consequently, the procedures, and the organizational and security measures that people affected by This Policy undertakes to implement in its area of responsibility.

To this end, the Directorate will assign the responsibilities to the personnel involved in the data processing operations.



2. Scope of application

This Policy for the protection of personal data will be applicable to the Company, its administrators, managers and employees, as well as to all persons who interact with it, with the express inclusion of service providers with access to data (“Processors”)

3. Principles of the processing of personal data

As a general principle, the Company will scrupulously comply with the legislation on the protection of personal data and must be able to prove it (Principle of “proactive responsibility”), paying special attention to those treatments that may pose a greater risk to rights of those affected (Principle of “risk approach”).

In relation to the aforementioned LARRENO, SL will ensure compliance with the following Principles:

-  **Legality, loyalty, transparency and limitation of the purpose.** The data processing should always be informed to the affected party, through clauses and other procedures; and it will only be considered legitimate if there is consent to the processing of data (with special attention to that provided by minors), or has another valid legitimation and the purpose of it is in accordance with regulations.
-  **Dataminimization.** The data processed must be adequate, relevant and limited to what is necessary in relation to the purposes of the treatment.

- 📄 *Accuracy.* The data must be accurate and, if necessary, updated. In this regard, the necessary measures will be taken so that personal data that is inaccurate with respect to the purposes of the processing are deleted or rectified without delay.
- 📄 *Limitation of storage period.* The data will be maintained in a way that allows the identification of the interested parties for no longer than necessary for the purposes of the treatment.
- 📄 *Integrity and Confidentiality.* The data will be treated in such a way that adequate security of personal data is guaranteed, including protection against unauthorized or unlawful treatment and against its loss, destruction or accidental damage, through the application of appropriate technical or organizational measures.
- 📄 *Transfer of data.* It is prohibited to purchase or obtain personal data from illegitimate sources or in those cases in which said data has been collected or transferred in contravention of the law or its legitimate origin is not sufficiently guaranteed.
- 📄 *Hiring suppliers with access to data.* Only suppliers that offer sufficient guarantees to apply appropriate technical and security measures in the processing of data will be chosen for contracting. Due agreement will be documented with these third parties in this regard.
- 📄 *International data transfers.* All processing of personal data subject to European Union regulations that imply a transfer of data outside the European Economic Area must be carried out with strict compliance with the requirements established in the applicable law.
- 📄 *Rights of those affected.* The Company will provide those affected with the exercise of the rights of access, rectification, deletion, limitation of treatment, opposition and portability, establishing internal procedures for this purpose, and in particular the models for their exercise that are necessary and timely, which they must meet, at least, the legal requirements applicable in each case.

The Company will promote that the principles contained in this Policy of protection of personal data are taken into account (i) in the design and implementation of all work procedures, (ii) in the products and services offered (iii) in all the contracts and obligations that formalize or assume and (iv) in the implementation of how many systems and platforms allow the access of employees or third parties and / or the collection or processing of personal data.

4. Commitment of workers

Workers are informed of this Policy and declare themselves aware that personal information is an asset of the Company, and in this regard adhere to it, committing to the following:

- 📄 Conduct awareness training In Data protection that the Company puts at your disposal.
- 📄 Apply the security measures at the user level that apply to your job, without prejudice to the responsibilities in its design and implementation that could be attributed to it depending on its role within LARRENO, SL.
- 📄 Use the formats established for the exercise of Rights by those affected and inform the Company immediately so that the response can be made effective.
- 📄 Inform the Company, as soon as it becomes aware, of deviations from the provisions of this

Policy, in particular of “Violations of security of personal data”, using the format established for this purpose.

5. Control and evaluation

An annual verification, evaluation and evaluation will be carried out, or whenever there are significant changes in the data processing, of the effectiveness of the technical and organizational measures to guarantee the safety of the treatment.

LARRENO, SL