

## Privacy policy

In accordance with the provisions of the applicable legislation on the protection of personal data, the user is informed of the following:

### Data controller

Zelestra Corporación, S.A.U. (Zelestra), con N.I.F.: A95363859, Registered Office: Avenida de Algorta 16, 3º. 48992 Getxo (Vizcaya), Spain.

### Purpose of personal data processing

Personal data provided via the website shall be incorporated into processing records owned by Zelestra or the companies that comprise the Zelestra Group, which can be checked on <https://zelestra.energy/> with the following purposes:

Purpose 1: query management

- Data processed for this purpose: identification and contact data (such as name, last name, and e-mail address) provided by the user.
- Description of the purpose: manage the queries made by users through the contact forms implemented for this purpose in the web portal.
- Basis of legitimacy: the processing is based on the consent given by the user by means of the clear affirmative action that involves sending the query through the form prepared for this purpose.

Purpose 2: incident management

- Data processed for this purpose: identification and contact data (such as name, last name, and e-mail address) provided by the user.
- Description of the purpose: to deal with any incidents that may arise in connection with the use of the web site.
- Basis of legitimacy: the processing is based on the legitimate interest of Zelestra, consisting of pursuing a correct development of the website, avoiding the occurrence of illicit, fraudulent or harmful practices to its own interests or those of a third party.

Purpose 3: send news alerts on the website.

- Data processed for this purpose: identification and contact data (IP address of the terminal used for the connection) collected by means of information retrieval systems (cookies).
- Description of the purpose: in those cases, in which the user subscribes, to send alerts of new content published on the website.
- Basis of legitimacy: the processing is based on the consent given by the user by means of the clear affirmative action that involves sending the query through the form prepared for this purpose.

Purpose 4: implement cookies

- Data processed for this purpose: identification and contact data (IP address of the terminal used for the connection) collected by means of information retrieval systems (cookies).
- Description of the purpose: install those tracking systems that report on browsing habits or cookies accepted by the interested party, as indicated in the Cookies Policy of this website.
- Basis of legitimacy: the processing is based on the consent given by the user.

Purpose 5: manage queries regarding job opportunities

- Data processed for this purpose: identification and contact data (such as name, last name, e-mail address and country of residence) provided by the user.
- Description of the purpose: manage queries regarding employment opportunities in Zelestra, made by users.
- Basis of legitimacy: the processing is based on the consent given by the user by means of the clear affirmative action that involves sending the query through the form prepared for this purpose.

Purpose 6: ethics channel management

- Data processed for this purpose: identification and contact data of the whistleblower / informant (such as name, last name, e-mail address and telephone number) provided by the user, as well as data of the people affected by the complaint or query (such as name and last name).
- Description of the purpose: manage queries regarding Zelestra's corporate ethics channel made by users.
- Basis of legitimacy: the processing is based on legal obligation or legitimate interest.

**Origin of the personal data**

The personal data of an identifying and contact nature that Zelestra will process, including name, last name, e-mail address, etc., have been provided mostly directly by the user himself/herself through forms. Users are responsible for the accuracy of the data and for updating it.

Likewise, Zelestra may obtain information collected through the web, such as statistical or navigation data.

**Third party personal data**

If the data provided belonged to a third party, the user guarantees that he or she has informed the third party of this Privacy Policy and obtained his or her consent to furnish his/her data to Zelestra for the stated purposes. He/she also confirms that the data provided is accurate and up-to-date, and assumes liability for any loss or damages, whether direct or indirect, that may be incurred as a result of non-compliance with this obligation.

### **Conservation period for personal data**

Zelestra will proceed to cancel the collected data when they are no longer necessary or relevant for the purpose for which they were collected or registered.

We will retain your personal data in a form that can identify you as long as this is necessary to comply with said purposes and meet our legal obligations. In general, this purpose includes the following situations:

- Your personal data is reasonably necessary to provide you with the services you have requested (e.g. query management, incident management, etc.).
- Your personal data are reasonably necessary to protect and defend us from claims (generally during the limitation period for the exercise of these actions).
- Where we are obliged to keep your personal data by applicable regulations (e.g. law 2/2023, etc.).

If the customer revokes their consent or exercises their rights of cancellation or deletion, his data shall be kept blocked at the disposal of the Administration of Justice within the time limits legally established to meet the possible responsibilities derived from the processing of the same.

### **Transfers and recipients of personal data**

All transfers specified below are necessary for the fulfillment of the aforementioned purposes, or are carried out in compliance with a legal obligation. Personal data can be transferred to:

- Companies of the Zelestra, Group, which can be consulted <https://zelestra.energy/> for administrative purposes and management of the relationship with the client, based on Zelestra's legitimate interest to that effect. The legitimate interest for the aforementioned purpose of assignment would consist of guaranteeing better organization and optimization, as well as unified management of the resources of the business group in cases in which, internally, it is necessary for the effective execution of the activity undertaken in the website.
- Government Administrations and the Administration of Justice.
- Zelestra's suppliers who, where appropriate, are contracted to measure web traffic and user behavior by means of cookies and similar systems, in accordance with the Cookies Policy, and who will act as data processors.

No international transfer of users' personal data is foreseen. However, in the event of any international transfer, it will be carried out in compliance with the criteria and requirements of the regulations in force, through the adoption of appropriate legal guarantees, which may consist of the formalization with the recipient of the data of (i) Standard Contractual Clauses approved by the European Commission to legitimize the international transfer of data to third countries or (ii) in another valid legal instrument that allows guaranteeing an adequate level of protection equivalent to that of the European Economic Area.

### **Rights of data subject**

The user may exercise with Zelestra, if applicable, their rights of access, rectification or deletion, limitation of processing, opposition, portability and to oppose automated individual decisions at the e-mail address [rgpd@zelestra.energy](mailto:rgpd@zelestra.energy) or at Zelestra's registered office at Avenida de Algorta 16, 3º. 48992 Getxo, Vizcaya, Spain. They may also revoke their consent if they have granted it for any specific purpose and may modify their preferences at all times.

Additionally, the User is informed that they may address any type of claim regarding personal data protection to the Agencia Española de Protección de Datos (Spanish Data Protection Agency), [www.agpd.es](http://www.agpd.es), if they consider their rights in the matter are being violated.

### **Security measures**

The data provided will be incorporated into processing activities and will be treated with absolute confidentiality.

The Data Controller, as well as those involved in any phase of the processing and/or the entities to whom the data have been communicated – by virtue of the authorization given by the user – are obliged to observe professional secrecy and to adopt the levels of protection and the necessary technical and organisational measures within their reach that guarantee the security of the personal data, avoiding, as far as possible, unauthorised access, unlawful modifications, theft and/or loss of the data.

### **Updating of the Privacy Policy**

Zelestra reserves the right to modify this Privacy Policy in accordance with the applicable legislation at any time, with effect from the date of publication of such modification. If we make significant changes regarding the way we use your personal data we will communicate it promptly on this website or contact you directly. If you do not agree to these changes, please do not continue to use this website.

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