

Privacy and personal data protection policy

Objective

The purpose of this Policy is to set out the principles and standards that must guide our professionals and any third parties with whom we have relations with regard personal data protection, thus guaranteeing the right to data protection of all natural persons with whom we have relations, and ensuring respect for the right to honour and privacy in the processing of different types of personal data, from different sources, and for different purposes depending on their activity.

Commitments

Zelestra undertakes to protect the privacy of its employees, customers and business partners, and the processing of their personal data. For this purpose, it will carry out all its activities in accordance with the legislation of the countries in which it operates, in line with its spirit and purpose, and in accordance with the following general principles of personal data processing.

- **Principle of legitimacy, lawfulness and fairness of personal data processing**

To collect and process personal data for specific, explicit and legitimate purposes, whereby any further processing incompatible with such purposes following collection is prohibited.

In cases where obtaining explicit consent is compulsory, interested parties must provide unequivocal, free and specific consent prior to their data being collected.
- **Principle of minimization**

To process only those personal data that are strictly necessary and adequate for the specific purpose or purposes for which they have been collected.
- **Principle of accuracy**

To ensure the accuracy and updating, where necessary, of any personal data processed. If this is not the case, they are to be deleted or rectified.
- **Principle of storage period limitation**

To avoid storing personal data beyond the necessary period for meeting the purposes for which they were collected, except in legally envisaged cases.
- **Principle of transparency and information**

To treat personal data transparently with regard to the interested party, by providing them with information about the treatment of their data in a comprehensible and accessible way, using simple, clear language.
- **Principle of legitimate sources**

To avoid obtaining personal data from illegitimate sources, from sources that do not guarantee their origin or from sources where data have been collected or transferred in breach of the law.
- **Principle of integrity and confidentiality**

To establish the appropriate technical and organisational measures to ensure personal data protection and prevent their loss, destruction or accidental damage.
- **Principle of proactive responsibility**

To establish the appropriate technical and organisational privacy measures by design and by default, to ensure compliance with personal data legislation and the traceability of the decision-making processes regarding their processing.

- Principle by design and by default

Adopt measures that guarantee compliance with the standard from the moment a company, product, service or activity that involves data processing is designed, as a rule and from the origin.

- Contracting of processors

Prior to contracting, as well as during the term of the contractual relationship, to demonstrate the application of due diligence measures and ensure that the service provider with access to personal data for which Zelestra Group companies are responsible has been properly evaluated, selecting only those that offer the safeguards required by law.

- International data transfer

All processing of personal data subject to European Union law involving a data transfer outside the European Economic Area must be carried out in strict compliance with the requirements of the applicable law in the jurisdiction of origin. Likewise, all Group companies located outside the European Union must comply with any requirements established for international transfers of personal data that may be applicable in their jurisdiction.

- Rights of interested parties

To allow interested parties to exercise their rights of access, rectification, erasure, restriction of processing, data portability and objection as applicable in each jurisdiction, by establishing the internal procedures required to this end.

Zelestra Group companies shall ensure that the principles set out in this Policy are taken into account (i) in the design and implementation of all procedures involving the processing of personal data, (ii) in the products and services they offer, (iii) in all contracts and obligations they enter into with natural persons, (iv) in the implementation of all systems and platforms that allow access to Zelestra Group professionals or third parties to personal data and the collection or processing thereof, and (v) in international transfers of personal data.

Furthermore, Zelestra shall put in place suitable training programmes and make them available both online and face-to-face, or by any other appropriate method in accordance with applicable regulations. Such programmes shall be carried out with sufficient regularity to ensure that knowledge in this area remains up to date.

Monitoring system

This Privacy and Personal Data Protection Policy shall be regularly reviewed and updated by the Chief Compliance Officer to make sure it complies with applicable legal requirements and the highest standards at national and international level.

Communication and stakeholder engagement

This Policy is communicated and understood within Zelestra and is available on the information and communication channels that the Company makes available to all its stakeholders.

This Policy is publicly available on the Zelestra website.

In order to make it easier for any person to confidentially and anonymously report any breach of the principles described in this Policy, Zelestra's Ethics Line (<https://zelestra.integrityline.com/>) guarantees independence, impartiality and the absence of conflicts of interest throughout the process of receiving, processing and resolving such reports.

Scope

This Policy applies to all the companies of the Zelestra Group, to ZELESTRA CORPORACIÓN, S.A.U. and to those companies in which a majority of the shares, equity interests or voting rights are held, directly or indirectly, or to whose governing or administrative body it has appointed or has the power to appoint a majority of its members, such that it effectively controls the company.

With regard to investees over which the companies of the Zelestra Group do not have effective control, Zelestra shall promote principles and guidelines consistent with those set forth in this Policy.