

Personal data protection policy

1. Purpose	1
2. Scope of application	1
3. General Principles for the Processing of Personal Data	1
4. Basic principles relating to the processing of personal data	2
5. Security Measures	3
6. International Data Transfers	4
7. Data Protection Officer (DPO)	4
8. Implementation and Control	4
9. Evaluation and Update	4
10. Contact	5

The implementation of a Personal Data Privacy Policy at Grupo Tecopy responds to the organization's commitment to the protection of fundamental rights in the processing of personal information, aligning with the requirements of Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD) and Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and repealing Directive 95/46 / EC (RGPD). This *Policy* guarantees that the processing of customer, employee and collaborator data is carried out in a responsible, transparent and secure manner, consolidating an environment of trust and ensuring that privacy is a priority in all operational processes.

1. Purpose

This Personal Data Protection Policy aims to establish the principles and guidelines that guide the processing of personal data within the Group's scope, guaranteeing respect for the rights of natural persons, such as the right to privacy and the right to honor, in accordance with the applicable regulations on data protection, including the General Data Protection Regulation (GDPR) and the Organic Law on Data Protection (LOPD).

2. Scope of application

This Policy is applicable to all entities, departments and employees of the companies that make up Grupo Tecopy: Tecopy, SAU, Centro de Observación y Teledetección Espacial, SAU, Enclave Formación, SLU, Grupo Tecopy Cartera Empresarial, SL, as well as to subcontracted companies and other third parties that, in their relationship with these organizations, have access to personal data. Likewise, it is applicable to any processing of personal data carried out by the companies of the Group, regardless of their medium or the place where they are stored, provided that they are under the control of the Data Controller of the Group.

3. General Conditions for the Processing of Personal Data

The entities that make up the Group undertake to strictly comply with the data protection regulations in force in their jurisdiction, applicable according to the type of personal data processing they carry out and in accordance with the provisions or binding agreements adopted within the framework of the Group. Likewise, these entities will encourage the principles established in this Policy to be considered: (I) in the design and implementation of any process that involves the processing of personal data; (II) in the products and services they offer; (III) in all contracts and commitments formalized with natural persons; and (IV) in the implementation of systems and platforms that facilitate access, collection or processing of personal data by the Group's professionals or third parties.

4. Basic principles relating to the processing of personal data

a) Principle of Legality, Loyalty and Transparency

The processing of personal data must comply with the principles of legitimacy, legality and loyalty, according to current legislation. This means that personal data must be collected for specific and legitimate purposes, and in cases where necessary, prior consent must be obtained from the data subjects.

Furthermore, the purposes of data processing must be clear and established at the time of collection. In particular, sensitive data, such as data relating to racial origin, political ideology, religious beliefs, sexual orientation, trade union membership, health, or genetic or biometric data, will not be collected or processed, unless permitted or required by law. In such cases, the processing of such data will be subject to the corresponding regulations.

b) Principle of Limitation of Purpose

Personal data may only be collected for specified, explicit and legitimate purposes and must not be further processed in a way that is incompatible with those purposes. This means that the organisation must specify the purpose of the processing from the outset and not use the data for other purposes without obtaining further consent.

c) Data Minimization Principle

The processing of personal data must be limited to data that is strictly necessary in relation to the purposes for which it is processed. That is, only data that is adequate, relevant and limited to what is necessary must be collected and processed.

d) Principle of Accuracy

Personal data must be accurate and, where necessary, kept up to date. It is the responsibility of the controller to take reasonable steps to ensure that data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

e) Principle of Limitation of the Conservation Period

Personal data must be kept in a format which permits identification of data subjects for no longer than is necessary for the purposes of processing. This means that data cannot be kept indefinitely, unless there is a legal justification for doing so.

f) Principle of Integrity and Confidentiality

Personal data must be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, by applying appropriate technical and organizational measures.

g) Principle of Proactive Responsibility (Accountability)

The controller must be able to demonstrate compliance with the above principles. This principle requires organisations to take a proactive approach to ensuring compliance by implementing the necessary measures (such as audits, records of processing activities, etc.) and being able to prove that compliance if necessary.

h) Rights of interested parties

Interested parties whose personal data is processed by Grupo Tecopy have the following rights:

- **Right of access:** Interested parties have the right to know whether we are processing their data, what data we are processing and to receive a copy of it.
- **Right to rectification:** You may request the modification of inaccurate or incomplete data.
- **Right to deletion (right to be forgotten):** Interested parties may request the deletion of their data when they are no longer necessary for the purposes for which they were collected, among other cases.
- **Right to restriction of processing:** You may request restriction of processing of your personal data in certain circumstances.
- **Right to data portability:** Interested parties may request the transmission of their data to another controller.
- **Right to object:** Interested parties may object to the processing of their data in certain situations and request that we stop processing their data.

To exercise any of these rights, interested parties must contact Grupo Tecopy through the means provided in the contact section.

5. Security Measures

Grupo Tecopy undertakes to implement the necessary technical and organisational measures to ensure an adequate level of security in the processing of personal data. These measures include:

- Restricted access control to treatment systems.
- Using encryption technologies to protect sensitive data.
- Periodic internal audits to ensure compliance with regulations.
- Procedures to manage security incidents, including notification to data protection authorities where necessary.

6. International Transfers Data

Any international transfer of data carried out by the Group will be subject to appropriate safeguards in accordance with applicable regulations. If personal data must be transferred outside the European Economic Area (EEA), it must be ensured and guaranteed that the necessary conditions are met, such as the existence of standard contractual clauses approved by the European Commission or adequacy decisions.

7. Data Protection Officer (DPO)

Grupo Tecopy has appointed a Data Protection Officer (DPO), responsible for ensuring compliance with this Policy and applicable data protection regulations. The DPO is also the point of contact for interested parties who wish to exercise their rights or make enquiries regarding the processing of their personal data.

8. Implementation and Control

The implementation of this Policy is carried out under the supervision of the HR Department, which will be responsible for its correct application. Likewise, periodic internal controls will be carried out to ensure its effectiveness and compliance. If non-compliance is detected, appropriate corrective measures will be adopted.

9. Evaluation and Update

This Policy will be reviewed and updated periodically, at least once a year, or whenever there are relevant changes in the applicable regulations, in the internal practices of the organization, or in any other aspect that may affect the protection of personal data. The purpose of this review is to ensure that the Policy remains updated, relevant and adapted to the needs of Grupo Tecopy and the rights of the interested parties.

To ensure transparency and compliance with this Policy, any modification made will be communicated clearly and promptly to all interested parties through the following channels:

- **Corporate Email:** A notification will be sent directly to the email addresses of interested parties registered in the organization's database.
- **Corporate Intranet:** Updates will be available in the corresponding section of the intranet, so that the organization's internal staff can access and review changes to the Policy at any time.
- **Official Website:** Updates will be posted on the organization's website in the privacy and data protection section, accessible to any interested party.

- **Internal Bulletins and Information Meetings:** In the case of significant changes, a summary will be included in the organization's internal bulletins or information meetings will be organized, both in person and virtually, to explain the changes and resolve any questions.

With these measures, the Group undertakes to keep all interested parties informed about the personal data protection practices and measures implemented, ensuring that the current policy is always publicly known and easily accessible.

10. Contact

The Interested parties, including clients, employees, collaborators or any other person whose personal data is processed by Grupo Tecopy, may contact us to make inquiries, requests or any other matter related to the protection of personal data. This includes, among others, the exercise of their rights of access, rectification, deletion, limitation of processing, opposition and portability of data, in accordance with the applicable data protection regulations.

To do so, you can contact the Grupo Tecopy data protection team via the following email address: dpo@grupotecopy.es