

1. INTRODUCTION

ANTOLIN understands the importance of privacy and data protection in all the areas where we operate. We are committed to the highest ethical and data protection standards in our daily activities, reiterating the Company's commitment to strictly compliance with Privacy regulations, developing programs and procedures that maintain the trust of our employees and stakeholders in how the company protect their personal data, and respect their privacy.

2. OBJECT

Define a Policy that establishes the principles and commitments of ANTOLIN in relation to the personal data processing and protection, in accordance with the applicable data protection regulations and internal procedures, in order to set a common standard in terms of data protection throughout the Organization.

3. SCOPE OF APPLICATION

Apply to all ANTOLIN companies and to all operations in which there is a data processing activity, in order to comply with legal requirements and establish a common standard for data protection throughout the Organization.

4. KEY PRINCIPLES

Key principles of action which lie at the heart of the general data protection regime and create a backbone of any privacy compliance program:

- Respect the privacy expectations of the data subjects;
- Lawfulness, fairness and transparency: Processing must be lawful, fair, and transparent to the data subject.
- Purpose Limitation: Process data for the legitimate purposes specified explicitly to the data subject when you collected it.
- Data Minimization: Collect and process only as much data as absolutely necessary for the purposes specified.
- Accuracy: Keep personal data accurate and up to date.
- Storage limitation: Only store personally identifying data for as long as necessary for the specified purpose.
- Integrity and confidentiality: Processing must be done in such a way as to ensure appropriate security, integrity, and confidentiality.
- Data Security: Handle data securely by implementing "appropriate technical and organizational measures
- Data Rights: Inform data subjects of their rights, facilitating the way for their exercise.
- Data Protection by design and by default: Consider the data protection principles in the design of any new operation or activity.
- Data Breach: Provide the channels and means for notifying potential data protection security breaches.
- International data transfer: Set data protection guarantees when transfer personal data to a third country.
- Accountability: Be able to demonstrate compliance with all of these principles.

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5. DATA GOVERNANCE

One of the ways in which we demonstrate our commitment to ensure and maintain the trust of our stakeholders is to safeguard their personal information. For this purpose ANTOLIN created a Privacy Committee, being a multi-disciplinary body.

Privacy Committee at ANTOLIN HQ has designed the privacy model at Corporate level and has expanded it globally. Scope, composition and functions of the Privacy Committee are regulated in an internal regulations, accessible on the intranet in the Privacy Section.

6. DATA PROTECTION OFFICER

To guarantee the data protection rights of all those interested parties with which ANTOLIN is related, adequate resources have been allocated for the implementation of this Policy, as well as the applicable regulations on data protection.

One of the essential roles for this is the Data Protection Officer (DPO), who is the ANTOLIN's corporate representative for the protection of personal data. The main functions of the Corporate DPO are:

- Supervision of compliance with current regulations on data protection.
- Consultancy on data protection matters to all the company's units that require it, both business and corporate.
- Implementation and application of privacy and data protection policies, and assessment of the impact on the matter of new projects that process or contain personal data.
- Communication with the competent control authorities and interested parties in the context of their area of responsibility.
- Compliance with all those powers and functions assigned by the reference regulations, among others, those contained in article 39 of the RGPD.

7. DATA PROTECTION MANAGEMENT SYSTEM

To fulfill the internal and statutory requirements and achieve optimal legal certainty, ANTOLIN implemented a Data Protection Management System.

This System gathers the scheme, procedures, guides and forms that allow establishing a global privacy standard of internal compliance and help meet the extensive legal requirements of regulations such as the GDPR.

Likewise, a roles and responsibilities guide is established where the functions, stakeholders and responsibilities are defined to ensure compliance with this Policy and all the documents derived from it.

8. DATA PRIVACY BREACHES OR INCIDENTS COMMUNICATION

ANTOLIN promotes a culture for the diligent management of personal data. On the one hand, this new culture of dealing with personal data security breaches should make it possible to minimize the impact on those affected, establishing internal mechanisms and procedures in order to identify, report and act in the event of a breach or security incident.

On the other hand, as important as solving a data security breach and minimizing the consequences on

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those affected, is learning from it, and determining what has failed in the procedures for the management and processing of personal information.

In order to meet these objectives, a Global Policy for the Management and Notification of Personal Data Breaches is established.

9. CONSULTATIONS AND EXERCISE THE DATA RIGHTS

Individuals may contact the Company to exercise their rights (access, rectification, opposition, limitation, erasure...), so ANTOLIN must implement the necessary means to respond to these requests.

ANTOLIN has decided to centralize the management and response to the requests that any interested party may address in the exercise of their rights regarding data protection, using the email address privacy@antolin.com.

10. TRAINING AND AWARENESS

ANTOLIN is committed to the firm conviction that the effective application and implementation of the rights and obligations enacted by the data protection regulations requires the undeniable establishment of a culture of knowledge and compliance with these regulations by every one of its employees.

In this regard, on an annual basis and since the entry into force of the GDPR, the Company has provided training on the subject using the teaching platforms available to the company and adapting said training to the extent possible to the relationship of each employee with the data, in accordance with their work competences.

11. APPOINTMENT OF THE LEAD SUPERVISORY AUTHORITY

From the perspective of ANTOLIN, as a multinational business group that operates in different legal environments, taking into account the location of the parent company, the Spanish Data Protection Agency is considered the Lead Data Protection Supervisory Authority, without prejudice to maintaining relationships and coordination with the different Supervisory Authorities worldwide.

12. BINDING CORPORATE RULES

Any personal data transfer throughout Antolin's global business take place in accordance with applicable data privacy laws and in accordance with our Binding Corporate Rules ("BCR").

Our BCRs are corporate privacy compliance frameworks that reflect the standards contained in European data privacy laws (including the GDPR). Having our BCR means that all Antolin entities which have signed up to our BCR have to comply with the same internal rules. It also means that your rights stay the same no matter where your data are processed by Antolin.

You can download a copy of our [Binding Corporate Rules](#).

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