



DATA PROTECTION POLICY

GRUPO EMPRESARIAL SANDO S.A. (hereinafter, the data controller), assumes the maximum responsibility and commitment to the establishment, implementation and maintenance of this Data Protection Policy, guaranteeing the continuous improvement of the data controller with the aim of achieving excellence in relation to compliance with Regulation (EU) 2016/679, of 27 April (GDPR) and Organic Law 3/2018, of 5 December (LOPDGDD),

The Data Protection Policy of **GRUPO EMPRESARIAL SANDO S.A.** It is based on the principle of proactive responsibility, according to which the controller is responsible for regulatory compliance and is able to demonstrate this to the competent supervisory authorities.

In this sense, the data controller will be governed by the following principles that must serve all its staff as a guide and reference framework in the processing of personal data:

1. Data protection by design: the data controller shall apply, both at the time of determining the means of processing and at the time of the processing itself, appropriate technical and organisational measures, designed to effectively apply the principles of data protection, such as data minimisation, and to integrate the necessary safeguards into the processing.

2. Data protection by default: the controller will apply appropriate technical and organisational measures with a view to ensuring that, by default, only personal data that are necessary for each of the specific purposes of the processing are processed.

3. Data protection in the information life cycle: the measures that guarantee the protection of personal data will be applicable during the entire life cycle of the information.

4. Lawfulness, loyalty and transparency: personal data will be processed in a lawful, loyal and transparent manner in relation to the data subject.

5. Purpose limitation: personal data will be collected for specific, explicit and legitimate purposes, and will not be further processed in a manner incompatible with those purposes.

6. Data minimisation: personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7. Accuracy: Personal data shall be accurate and, if necessary, up-to-date; all reasonable steps shall be taken to ensure that personal data that is inaccurate in relation to the purposes for which they are processed are deleted or rectified without delay.

8. Limitation of the storage period: personal data will be kept in such a way as to allow the identification of the data subjects for no longer than is necessary for the purposes of processing the personal data.

9. Integrity and confidentiality: Personal data shall be processed in such a way as to ensure adequate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, through the application of appropriate technical or organisational measures.

10. Information and training: one of the keys to guaranteeing the protection of personal data is the training and information provided to the personnel involved in the processing of these. During the information lifecycle, all personnel with access to the data will be suitably trained and informed about their obligations in relation to compliance with data protection regulations.

The Data Protection Policy of **GRUPO EMPRESARIAL SANDO S.A.** it is communicated to all the staff of the data controller and made available to all interested parties.

Consequently, this Data Protection Policy involves all the staff of the data controller, who must be aware of it and assume it, considering it as their own, each member being responsible for applying it and verifying the data protection regulations applicable to their activity, as well as identifying and providing the opportunities for improvement that they consider appropriate with the aim of achieving excellence in relation to its compliance.

This Policy will be reviewed by the Management of **GRUPO EMPRESARIAL SANDO S.A.**, as many times as deemed necessary, in order to comply at all times with the provisions in force on the protection of personal data.