

## PRIVACY POLICY

### 1. OBJECTIVES

The Privacy and Data Protection Policy of VASALTO TECH AND TALENT, SL (hereinafter, VASALTO), with registered office at Paseo de la Castellán, 230, Madrid 28046, and CIF No. B81362881, has as its main mission to establish the global guidelines regarding to the following objectives:

- Contribute to the harmonized interpretation and generalized, systematic and adequate application of the provisions of the General Data Protection Regulation (hereinafter GDPR) and other applicable laws and regulations in this area.
- Ensure the rights of the owners of the data and contribute to the maintenance of their confidence in the ability of the entity to guarantee such rights in harmony with the legitimate interests of VASALTO.
- Ensure appropriate mitigation of risks to the rights and freedoms of natural persons, and an effective response capacity in the event of incidents or violations of data security.

### 2. SPECIFIC RULES

2.1. GENERAL FRAMEWORK Economic, cultural, social and technological development presents significant risks and challenges to the privacy of citizens. In this context, and in order to respond to these risks, but also in order to ensure a consistent framework for the protection of personal data throughout the Union, in April 2016, Regulation (EU) 2016 / 679 of the European Parliament and of the Council, concerning the protection of natural persons (General Data Protection Regulation - "GDPR"). This regulation has revoked Directive 95/46 / EC, and will be applicable in all Member States from May 25, 2018, although it may be complemented at national level through specific legislation and regulations. Personal data is essential for the development of the activity of VASALTO, and its protection acquires a vital importance for the development of its business, that is, for the offer and commercialization of its services, for the daily management of the services provided, for compliance with legal and regulatory obligations, and for the management of their human resources.

The protection of personal data is part of the Internal Control System of VASALTO, and is governed by the general principles and rules defined in this area, adapted and adjusted in accordance with applicable legislation and defined in this policy and others that are of Application in this matter. In accordance with international best practices and with the legislation and regulations in question, this Policy establishes the general principles and describes how they should be understood and applied by the recipients, and is applicable to all personal data that are under VASALTO's responsibility, regardless of the format that the information may adopt, and phase of its life cycle, thereby complying with the principle of privacy by default.

2.2. APPLICABILITY AND CURRENT This policy, together with the derived corporate guidelines, should be understood as a global reference framework, subject to evolution and revision,

being contextualized and applied in line with VASALTO's business and operating model, and in compliance with applicable laws and regulations. In each case. This policy is complemented by the other policies and procedures in force in VASALTO, ensuring its proper harmonization and complementarity.

### 3. DATA PROTECTION PRINCIPLES

In the operations of personal data processing, VASALTO will respect the following principles:

- Principle of legality: personal data will be processed to the extent that it is found, at least, one of the conditions provided for the licit treatment: (i) when the owner of the data has given his consent; when the treatment is necessary for (ii) the execution and management of a contract, (iii) the fulfillment of a legal obligation, or (iv) the pursuit of a legitimate interest of the company or third parties.
- Principle of good faith and limitation of purpose: personal data will be collected and processed for specific purposes communicated to the interested party and, in no case, for different purposes.
- Principle of minimization and limitation of conservation: only personal data that are adequate, relevant and not excessive, and for the time strictly necessary for their respective purposes will be treated.
- Principle of transparency: the owners of the data will be clearly informed about the main characteristics and measures of protection of their personal data, in particular, about the respective purposes of processing and eventual transmission to third parties.
- Principle of need for access: only workers and employees whose functions require it will have access to the personal data processed by VASALTO.

### 4. PERSONAL DATA TREATED BY VASALTO

VASALTO only proceeds to the collection and processing of the personal data necessary for the provision of a personalized and quality service, thereby attending to the principle of minimization of the data established in the GDPR standard.

In the provision of services, it proceeds to the treatment of different categories of personal data that, ultimately, are conditioned by the object and scope of the services provided to the client. In this sense, the following categories of personal data are processed:

- Identification and contact information (such as name, surname, NIF, physical and email address, or mobile phone).
- Data derived from their professional activity and financial situation (income, income, equity, contracted financial products, etc.).
- Demographic data (such as nationality, place and date of birth, age, sex, marital status, number of children, or family relative data)

In the field of human resources management, administration, accounting or financial advice services provided to third parties as Responsible for the Treatment, VASALTO acts as the Person in Charge of the Treatment and, therefore, receives the precise instructions from the clients regarding the object of the service that must be provided, making the treatment of the categories of data necessary to achieve said provision of services.

On the other hand, VASALTO may collect your personal data through third parties.

This may happen, for example, in cases where your contact is facilitated by a family member or representative for the management of certain specific procedures, that is, a member of a corporate body of a legal entity that is a VASALTO customer.

Whenever the entity collects your data through third parties or by other means, it will provide you with information regarding the processing of your personal data.

VASALTO does not systematically deal with special categories of personal data, that is, data related to their racial or ethnic origin, their health, their life or sexual orientation, their religious, philosophical or political opinions, or genetic or biometric data . However, in cases where it is necessary, the interested party will be duly informed, and the request for timely consent will be made.

## 5. PURPOSES OF DATA PROCESSING

VASALTO only treats your personal data according to the following purposes:

### 5.1. FOR THE EXECUTION OF A CONTRACT CONCLUDED WITH YOU OR FOR THE IMPLEMENTATION OF PRECONTRACTUAL DILIGENCES ON YOUR REQUEST

In the field of contracted service provision, the entity will process your personal data. This will happen, for example, in the following cases:

- Management of the contractual relationship (such as services related to human resources management, administration, accounting or financial advice to Treatment Managers or statements of income, assets, inheritance, donations or transfer of assets in the field of natural persons).
- Improvement of service quality (such as analysis and treatment of information related to the quality and performance of the different means and processes of service provision and claims management).

### 5.2. FOR THE FULFILLMENT OF LEGAL OBLIGATIONS TO WHICH VASALTO IS SUBJECT

The entity is subject to numerous legal and regulatory obligations, whose compliance may imply the need to proceed with the processing of your personal data. This happens, for example, in relation to:

- Compliance with retention, payment or declaration obligations for tax purposes.
- Compliance with procedures regarding prevention and fight against financial crimes (such as money laundering prevention).
- Compliance with current regulations regarding personal data protection.

### 5.3. FOR THE LEGITIMATE INTEREST OF VASALTO

The entity uses your personal data to develop its services and defend its own legal rights and interests, which includes:

- Improvement of service quality (such as analysis and treatment of information related to the quality of service provision and management of possible customer complaints in the context of the services provided).
- Security and protection of personal data (such as implementation of logical and physical information security measures, such as backup, restoration and disaster recovery and regular evaluations of the implementation of security measures, monitoring of the use of tools corporate such as computer applications, email service, or web browsing made available to employees in the professional field).
- Physical security and video surveillance (such as the implementation of physical security measures and supervisory evaluations of the implementation of measures).
- Supervision and control of the application of the procedures necessary for the execution of the contract or the fulfillment of legal obligations (such as procedures to guarantee the proper functioning of the internal control system).
- Marketing and communication of own services.

### 5.4. TO ATTEND THE CONSENT GRANTED BY YOU

In those cases, in which VASALTO requires the consent of the interested party for the processing of personal data, the appropriate request will be made according to the intended purpose.

In the event that the processing of the data may imply automated decision-making that produces effects in the legal field or may similarly affect, VASALTO will provide, at that time, information about the logic underlying such treatment, as well as on the importance and expected consequences of that treatment.

## 6. DATA RECIPIENTS

In order for the entity to comply with all obligations and provide the best service, you may have to communicate your personal data to other entities.

VASALTO may communicate your personal data to the following entities:

Providers that provide services as Treatment Managers.

Public authorities in response to legal obligations formalized for this purpose.

## 7. DATA CONSERVATION PERIODS

VASALTO will keep your personal data as long as the contractual relationship with you is maintained, as well as, once said relationship is over, during the limitation period of the applicable criminal, civil, tax or commercial regulations.

| PURPOSE  | BASIC OF BIDDING                          | CONSERVATION TERM  |
|--|---|--|
| Contract Relationship Management   | Execution of the contractual relationship | As long as the contractual relationship remains active and does not prescribe the applicable legal deadlines |
| Improvement of service quality   |   |  |
| Marketing and communication of own services  |   |  |
| Security and protection of personal data   |   |  |
| Improvement of service quality   | VASALTO legitimate interest               | While the contractual relationship remains active  |
| Supervision and control of the application of the necessary procedures for the execution of the contract or the fulfillment of legal obligations |   |  |
| Physical security and video surveillance   |   |  |
| Compliance with retention, payment or declaration obligations for tax purposes   |   |  |
| Compliance with current regulations regarding personal data protection   | Compliance with legal obligations         | Formalized Legal Deadlines   |
| Compliance with procedures regarding prevention and fight against financial crimes   |   |  |

## 8. RIGHTS OF THE HOLDERS

The rights of the owners of the data are guaranteed from the moment they are collected, the purpose underlying the processing being lawful, and the appropriate technical and organizational measures regarding their confidentiality and integrity being adopted.

VASALTO has provided itself with the necessary means to meet the requests made by the owners of the data in the exercise of their rights.

With regard to the processing of your personal data, the owner of the data enjoys the following rights:

### 8.1. RIGHT OF ACCESS

Whenever requested, the holder will have the right to obtain confirmation about whether their personal data is processed by VASALTO.

Likewise, you will have the right to access your personal data, as well as to obtain the following information:

1. Reasons why your data is processed;
2. Types of personal data that are processed;
3. Entities to which your personal data may be transmitted, including entities located in countries outside the European Union or international organizations, being, in this case, informed of the guarantees applied to the transfer of your data;
4. Deadlines for the preservation of your data or, if that is not possible, the criteria for establishing such deadlines;
5. Rights you enjoy in relation to the processing of your personal data;
6. If the personal data had not been provided by the owner himself, information on the origin thereof;
7. Existence of automated individual decisions, including definition of profiles, and, in that case, information on the logic underlying that treatment, as well as on the importance and expected consequences thereof.

The owner of the data has the right to obtain a copy of their personal data that is subject to processing by VASALTO.

### 8.2. RIGHT OF RECTIFICATION

Whenever the holder considers that his personal data is incomplete or incorrect, he may require its rectification, or that these are completed.

### 8.3. CANCELLATION RIGHT

The owner of the data has the right to request the cancellation of their personal data when it is verified that any of the following situations have occurred:

1. That personal data cease to be necessary for the purpose that motivated its collection or treatment.
2. That the consent on which the data processing is based is withdrawn and that there is no other legal basis for it;
3. That it opposes the processing of the data and that there are no prevailing legitimate interests that justify the processing or that the data be processed for direct marketing purposes;
4. That personal data has been treated illegally;
5. That the personal data have to be canceled under the protection of a legal obligation to which VASALTO is subject; or

6. That the personal data have been collected in the context of the offer of services of the information society.

The right to cancellation will not apply when the treatment is necessary for the following purposes:

1. The exercise of freedom of expression and information;
2. Compliance with a legal obligation that requires treatment and that is applicable to VASALTO;
3. Reasons of public interest in the field of public health;
4. Public interest archives, scientific or historical research purposes or statistical purposes, to the extent that the exercise of the right to cancellation seriously damages the achievement of the objectives of that treatment; or
5. The declaration, exercise or defense of a right in a judicial process.

#### 8.4. RIGHT TO LIMITATION OF TREATMENT

The owner may request the limitation of the processing of their personal data in the following cases:

1. If you challenge the accuracy of your personal data, for a period of time that allows VASALTO to verify its accuracy;
2. If the treatment is illegal and the owner opposes the cancellation of their personal data and requests, in return, the limitation of the processing;
3. If VASALTO no longer needs personal data for processing purposes, but they are necessary for the purpose of declaration, exercise or defense of a right in a judicial process; or
4. If you had opposed the treatment, until it is verified that the legitimate interests of VASALTO prevail over yours.

#### 8.5. PORTABILITY RIGHT

The owner has the right to receive their personal data in a structured, common use and automatic reading format.

Likewise, it has the right to request VASALTO to transmit such data to another person in charge of the processing whenever this is technically possible.

The right of portability will only apply in the following cases:

1. When the treatment is based on the express consent or execution of a contract;
2. When the treatment in question is carried out by automated means.

## 8.6. OPPOSITION RIGHT

The owner has the right to object to the processing of their personal data at any time, for reasons related to their particular situation, in the following cases:

1. When the treatment is based on the legitimate interest of VASALTO; or
2. When the treatment is carried out for purposes other than those for which the data were collected, but that are compatible with them.

In such cases, VASALTO will stop processing your personal data, unless you have legitimate reasons to carry out that treatment and that these prevail over the interests of the owner.

Likewise, the owner may oppose, at any time and without justification, the processing of their data for direct marketing purposes, including the definition of profiles related to that marketing.

## 8.7. RIGHT NOT TO BE SUBJECT TO AUTOMATED INDIVIDUAL DECISIONS

The holder has the right not to be subject to decisions made exclusively based on an automated data processing, including the definition of profiles, when such decisions have effects in their legal sphere or significantly affect it in a similar way.

Decisions may be made based on the automated processing of your data when authorized by national or European Union law.

In cases where the processing of data in question (i) is necessary for the conclusion or execution of a contract with VASALTO or (ii) is based on the explicit consent of the owner of the data, it may, in the same way, be subject to decisions made on the basis of the automated processing of your personal data. In these cases, however, the owner of the data will have the right to:

1. Obtain human intervention from VASALTO;
2. Show your point of view; Y
3. Disagree with the decision made.

Decision-making based on the automated processing of personal data will not be based on the treatment of special categories of data (such as health data, genetic data or data related to their racial or ethnic origin), except when the holder of the data has given explicit consent to that effect, or such treatment is necessary for reasons of significant public interest, in the legally applicable terms. In these cases, VASALTO will take all appropriate measures to guarantee rights and freedoms, as well as legitimate interests.

## 8.8. RIGHT TO WITHDRAW YOUR CONSENT

In the event that the processing of the data is carried out on the basis of the consent of the owner, he may withdraw his consent at any time.

In this case, your personal data will cease to be processed, except if there is another basis that allows it, such as the contractual relationship or the legitimate interest of VASALTO.

#### 8.9. RIGHT TO FILE A CLAIM BEFORE THE SUPERVISION AUTHORITY

The owner of the data has the right to file a claim with the Spanish Agency for Data Protection (competent authority for data protection).

#### 8.10. EXERCISE OF RIGHTS

The owner of the data may exercise their rights for free by means of a communication addressed to the Data Protection Delegate, to the following address: Paseo de la Castellana, 230, Madrid 28046, or via email addressed to [dpd@vasalto.com](mailto:dpd@vasalto.com), attaching a copy of your ID or passport

VASALTO will respond to requests for the exercise of rights by the owners of the data, without undue delay, and without exceeding the response period of one month.

The response to the requests will be facilitated by identical means to those used for the request, whenever its application is possible or if the holder does not request a different means.

### 9. REGISTRATION OF TREATMENT ACTIVITIES

VASALTO has prepared and maintains an internal registry (inventory) of the different processes of processing of personal data.

This record contains, at a minimum, the information requested by Article 30 of the GDPR: name and contacts of the data controller and Data Protection Delegate, purposes of the treatment, description of the categories of data owners, description of the data categories treated personnel, retention period / period for deletion of data, categories of recipients of the data, adequate guarantees in cases of transfer outside the EU and description of technical and organizational measures in the field of privacy.

### 10. DUTY OF INFORMATION AND CONSENT

VASALTO clearly and transparently communicates to the owner of the data the types of treatments carried out in relation to their personal data, with the detail of purposes and grounds of legality in accordance with the provisions of the GDPR. This duty of information is addressed in the following situations:

- When personal data is provided by the owner himself through the information clauses enabled in the data collection forms.

- When personal data is provided by a third party, in which case, the duty of information is met within a reasonable period after its collection, which does not exceed one month.

VASALTO obtains the consent of the owners of the personal data for the purposes and treatments carried out, unless the treatment is based on any of the following fundamentals of legality: legal, contractual and legitimate interest of the entity.

VASALTO guarantees that for its current universe of natural persons with whom it relates:

- Provide accurate information regarding the treatments performed.
- Obtains the appropriate consent, when applicable, in accordance with the provisions set forth in the GDPR.
- Defines the necessary action strategy when the owner of the data does not respond to the request for consent made.

## 11. SAFEGUARD AND PROTECTION OF PERSONAL DATA

Provided that they are not contradictory or insufficient, existing policies and means regarding the security of personal data held by VASALTO will be applied.

### 11.1. ANONIMIZATION AND SEUDONIMIZATION

In those cases in which VASALTO proceeds to anonymize the data in such a way that it is not possible to identify the holder from them, these are no longer considered personal data and, consequently, the GDPR norm does not apply to such set of data. In this sense, whenever possible, the entity proceeds to anonymize the data.

On the other hand, in cases where the anonymization of the data is not possible, VASALTO always raises the processes of pseudonymisation or encryption of personal data in order to mitigate the security risks that could arise from access by third parties. authorized.

Thus, the techniques of anonymization, pseudonymization and encryption are considered by VASALTO in the following cases:

- As part of the strategy of privacy from the design to guarantee the protection of data of the holder.
- As part of the risk mitigation strategy in the exchange of personal data with third parties.
- As part of the strategy to reduce the impact of data security breach in access scenarios by unauthorized third parties.
- As part of the data minimization strategy

### 11.2. PRIVACY SINCE DESIGN AND DEFAULT PRIVACY

In order to address the principle of privacy from the design, VASALTO considers the risks related to the protection of personal data from the conception of the treatment itself. In this

way, it is anticipated and prevented that invasive events for privacy may occur, as well as the existence of infringements of the rights of the owners.

The principle of privacy from the design mitigates the possibility that the risks of privacy materialize. This principle is not intended to identify solutions for security breaches, but to prevent them from occurring beforehand.

On the other hand, the principle of privacy by default formalized by VASALTO establishes that privacy should be a starting concern in the conception of a treatment, guaranteeing that, by default, only the treatment of the data strictly necessary for each one is carried out specific purpose of processing.

VASALTO has adopted the necessary internal rules and measures in order to guarantee these principles. These rules must be applied in the planning phase (definition of the means of data collection), as well as during the life cycle associated with the processing of the data (collection, maintenance, storage and destruction of personal data).

In this sense, these principles are considered in the following cases:

- Design and construction of a new IT system that stores, processes and allows access to personal data.
- Creation of a policy or regulation with implications for privacy.
- Definition of a new operational process that brings with it the processing of personal data.
- Expansion of the set of processing purposes planned for certain categories of data or interested parties.

Likewise, VASALTO applies mechanisms in order to ensure compliance with the principle of data retention. In certain circumstances, and taking into account the purpose of the treatment, the data is deleted immediately after the intended purpose is extinguished, and provided there is no legal obligation of conservation that derives from the purpose and the treatment performed.

By default, VASALTO guarantees that only those people who need it according to their professional skills access to personal data

Thus, both in the process of determining the means for the treatment of the data and, subsequently, during the processing of the same, VASALTO applies the appropriate technical and organizational measures, designed to effectively guarantee the principles of data protection.

These measures have been defined taking into account:

- The most advanced techniques and tools available.
- The application costs, taking into account the nature, scope, context and purposes of data processing.

- The risks to the rights and freedoms of natural persons that arise from the processing of data.

On the other hand, and in relation to the effectiveness of technical and organizational measures, they must guarantee:

- The minimization of the treatment in relation to the quantity, quality and periods of conservation of the data.
- The minimization of access guaranteeing the application of the minimum privilege policy.
- Pseudonymisation of the data in an initial phase of the treatment, whenever possible.
- Obtaining guarantees regarding the attention to the principle of transparency in the processing of personal data.
- The implementation of mechanisms that guarantee the periodic supervision of the processing of personal data, as well as the evaluation of compliance with the principles, rights and obligations set forth in the GDPR standard.

## 12. EXTERNAL SERVICE PROVIDERS (TREATMENT MANAGERS)

The contracting of a service provision may imply access by the provider to personal data that is under the responsibility of VASALTO.

In such cases, the entity establishes safeguards so that the objective conditions in which the provider provides the service guarantee the confidentiality and integrity of personal data.

In this sense, the policies enabled for the hiring and control of the service providers affected in the field of data protection (in charge of processing) contemplate the requirements that emanate from the GDPR standard.

VASALTO evaluates the guarantees offered by the data controller in relation to the principles, rights and obligations set forth in the GDPR standard, whether through the verification of codes of conduct, certification mechanisms or privacy audits carried out by independent third parties.

On a non-exhaustive basis, VASALTO considers sufficient guarantees some of the following assumptions:

- Adherence to codes of conduct or certification of privacy management systems.
- Reports of specific privacy audits that demonstrate the application of good practices and the adoption of technical and organizational measures that allow effective compliance with the GDPR norm, in particular, regarding the safety of the treatment.

The data processing agreement between VASALTO and the data controller will include:

- The purpose of providing the service from which the processing of personal data is derived.

- The duration of the provision of services.
- The nature and purpose of the treatment, including instructions regarding the treatment.
- The nature of the data that will be processed, as well as the categories of data subjects affected.
- The rights of VASALTO in relation to the possible planning of audits to the person in charge of the treatment.
- The obligations of the person in charge of the treatment for the due compliance with the GDPR norm.

### 13. INTERNATIONAL DATA TRANSFERS

In cases of international transfers (outside the European Union), provided that the European Commission has declared, through an adequacy decision, that the country in question located outside the European Union guarantees a level of protection of personal data equivalent to that resulting from European Union legislation, the transfer of data will be based on that adequacy decision.

You can check the existing adequacy decisions at [www.eur-lex.europa.eu](http://www.eur-lex.europa.eu).

In cases where the transfer is made to countries or organizations located outside the European Union for which there is no decision to adapt the Commission, VASALTO has established adequate guarantees to ensure the protection of your data based on the adoption of type contractual clauses, previously adopted or approved by the European Commission.

### 14. EVALUATION OF THE PRIVACY IMPACT (PIA - Privacy Impact Assessment)

VASALTO has formalized a model for the evaluation of the impact on privacy of the different existing personal data processing operations.

The entity guarantees the execution of impact evaluations in the data processing processes that could pose a high risk to the rights and freedoms of natural persons.

These evaluations are carried out in order to identify the appropriate preventive measures for the mitigation of the identified risks, being subject to periodic review and updating.

The Data Protection Delegate will supervise the execution of such evaluations, and review the results, contrasting the correct application of the identified mitigation preventive measures.

### 15. VIOLATION OF DATA SECURITY

The GDPR norm imposes a rigorous control of the security incidents that occur in terms of data protection (scenarios of data security violation).

The process that is applied in this area is an integral part of the entity's security incident management process.

In this sense, it is a priority to identify the requirements and the measures that must be adopted in order to notify security incidents to minimize the impact that is derived on the

rights and freedoms of natural persons (material and non-material damages and losses). for natural persons, as well as the loss of control over their own data or the restriction of their rights, discrimination, usurpation of identity, loss of confidentiality of the data or any other significant economic or social damage for the individual in question).

VASALTO has the obligation to notify the Control Authority (Spanish Agency for Data Protection) of any security incident related to data protection (scenarios of violation of data security) that involves a risk to the rights and freedoms of natural persons

Similarly, VASALTO must notify the owner of the data if the violation of the security of personal data is likely to involve a high risk to their rights and freedoms. In this regard, the entity takes into account the criteria defined in the GDPR standard, as well as other legal and regulatory guidelines, in relation to the criteria for classifying the severity of the incident.

Violations of the security of personal data are recorded and documented by anyone who detects a security incident. However, it will be the Delegate of Data Protection of VASALTO who reports the incident to the Control Authority (Spanish Agency for Data Protection), as well as to the owners of the affected personal data, in the event that this need is verified .

The period of notification to the Control Authority shall not exceed 72 hours from the moment in which the data security breach is known. If the notification is not transmitted within 72 hours, it must be accompanied by the reasons for the delay.

This notification will be made through the mechanism established by the Control Authority (Spanish Agency for Data Protection).

On the other hand, the notification to the holders of personal data, if possible, will be made individually to each of those affected, through direct means of communication such as email, a phone call or a mail This communication must be demonstrable, although confirmation of receipt by the owners of the data is not necessary. In the event that the notification involves a disproportionate effort, VASALTO will adopt alternative measures such as publication on the corporate website. In any case, VASALTO will consult the Control Authority (Spanish Agency for Data Protection) to formalize the performance criteria.

In the event that the treatment is carried out by an external provider, it will notify the security incident to VASALTO once it becomes aware of it. This obligation has been formalized in the contract for the provision of services formalized between the parties.

Regardless of whether the data security breaches are reported to the Control Authority (Spanish Agency for Data Protection), and those affected, as appropriate, VASALTO will document such violations, including the effects and corrective measures taken.

## 16. AUTOMATED DECISION MAKING AND PROFILE DEVELOPMENT

The owner of the data has the right not to be subject to automated decision-making, in the event that they have a significant impact on their legal sphere or that they significantly affect it in a similar way, except if:

- It was necessary for the conclusion or execution of a contract between the owner of the data and VASALTO.

- It was authorized by right of the Union or of the Member State to which VASALTO was subject and, in which, appropriate measures are also provided to safeguard the rights and freedoms, and the legitimate interests of the owner of the data.
- It was based on the explicit consent of the owner of the data.

The GDPR norm does not allow the use of special categories of personal data (sensitive data) in automated decision making, except in cases where appropriate measures are applied to safeguard the rights and freedoms, and the legitimate interests of the holder of the data.

VASALTO guarantees that, whenever necessary and applicable, it will be clearly and simply made available to the owners of the data how the profiling process or the automated decision-making process works.

#### 17. REVISION OF THE PRIVACY AND DATA PROTECTION POLICY

This Privacy and Data Protection Policy will be reviewed annually or whenever there are significant changes in the applicable legislation, business strategy or information systems of VASALTO.

All modifications to this Privacy Policy and Data Protection will be formally approved, and must be published and communicated to all affected.

#### 18. DATA PROTECTION DELEGATE

The main responsibility of the Data Protection Delegate is to monitor compliance with personal data obligations in cooperation with the Control Authority (Spanish Agency for Data Protection), as a point of contact for this authority and for the owners of the data .

The designation of the Data Protection Delegate has been carried out based on their professional qualities and, in particular, on their specialized knowledge in the domain of law and data protection practices, as well as their ability to perform the functions without the existence of scenarios of conflicts of interest.

On the other hand, VASALTO supports the Data Protection Delegate in the exercise of his functions, providing him with the necessary resources for their performance, and for the maintenance of his knowledge, as well as to give him access to personal data and operations of treatment.

You can contact the VASALTO Data Protection Delegate by communicating via email to the address [dpd@vasalto.com](mailto:dpd@vasalto.com).