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PERSONAL DATA PROTECTION

Policy

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1. Framework

Greenvolt - Energias Renováveis, S.A. and its subsidiaries (hereinafter jointly referred to as "Greenvolt") understand that the privacy of all people who interact with it is a fundamental element in establishing the relationship of trust it aims to achieve with all its employees, customers, suppliers, and partners.

The protection of Personal Data¹, as a fundamental commitment of Greenvolt towards its employees, customers, suppliers, and partners, is realised by Greenvolt through strict compliance with all the Personal Data Protection legislation in force, taking into account the best market practices, and in accordance with the highest ethical standards.

2. Objective

The companies that make up the Greenvolt Group adopt the necessary and convenient mechanisms for the Protection of Personal Data and continuously monitor and mitigate the risks that arise in the field of privacy and data protection, thus endeavouring to guarantee the commitment made to all their employees, customers, suppliers and other partners.

To ensure fulfilment of this commitment, the purpose of this Policy is to establish the principles of action of the Greenvolt Group with regard to the Protection of Personal Data.

3. Scope

The Policy is applicable, without prejudice to the particular legal framework of the respective geographies, to the entire Greenvolt Group.

In the case of companies in which Greenvolt exercises control, co-control (Joint Ventures or Joint-Ventures) or Significant Influence, the Greenvolt representatives present on the management body must, by virtue of exercising control, co-control or Significant Influence, promote the adoption of the measures necessary for the local transposition of this Policy.

In the case of companies in which Greenvolt does not exercise control or Significant Influence, Greenvolt's representatives shall comply with the provisions of this Policy in the performance of their

¹ Information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, electronic identifiers or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

duties and, to the extent possible, encourage the adoption of rules and procedures consistent with this Policy.

4. Action Principles

4.1. Lawfulness and Transparency

Greenvolt Group companies ensure that the processing of personal data - operations carried out on sets of personal data (by automated or non-automated means) such as collection, recording, organisation, erasure or alteration - that they carry out is supported by the legal grounds provided for by law, namely the following:

- a) The performance of a contract to which the data subject is a party, or for pre-contractual steps at the request of the data subject;
- b) The fulfilment of a legal obligation to which any Greenvolt Group company is subject;
- c) The pursuit of legitimate interests by the Greenvolt Group, after being duly assessed in conjunction with the interests or fundamental rights and freedoms of the data subjects that require the protection of personal data;
- d) The consent of the data subject, given through a clear positive act that freely, specifically, informedly and unequivocally expresses their will.

Data subjects are informed, in a concise, intelligible manner and using clear and simple language, of the characteristics of the processing of personal data that is carried out, namely what data is processed and for what purposes, what their rights are and how to exercise them, what the retention periods are and who the recipients of the data are, in the circumstances in which they exist.

In the circumstances in which incidents occur, the Greenvolt Group companies report them to the competent authorities and to the data subjects, insofar as the data breaches entail privacy risks, seeking to implement measures to eliminate or minimise their negative effects.

4.2. Privacy from the start

The companies of the Greenvolt Group, in the development and evolution of their activities, take into account the possible impacts on the privacy of data subjects.

As such, mechanisms are implemented to ensure, on the one hand, the integration of personal data protection measures at all stages of development and during the execution of processing activities and, on the other, the provision, by default, of products and services with the highest degree of data protection.

4.3. Proportionality

The personal data processed by Greenvolt Group companies is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed, which are specific, explicit and legitimate.

No personal data may be processed for purposes incompatible with those for which it was collected.

4.4. Respect for Rights and Choices

The Greenvolt Group recognises the importance of data subjects having control over their data and considers that they should be able to make informed decisions about how data processing is carried out.

Inherent in this control are the rights that data subjects have and that they can exercise with the Greenvolt Group companies through the channels made available for this purpose, such as the rights to information, access, rectification, erasure, limitation of processing, portability, opposition, as well as the right not to be subject to any decision taken solely on the basis of automated data processing, including profiling.

All requests to exercise rights are carefully analysed and answered within the time limits laid down by law, clarifying and respecting the decisions of data subjects.

4.5. Conservation Limitation

Personal data processed by Greenvolt Group companies is only kept for the time necessary to fulfil the purposes for which it was collected. Once they are no longer necessary, and unless there is a legal obligation to keep them for an additional period, personal data will be permanently deleted or rendered indecipherable through secure and reliable mechanisms.

4.6. Security and Confidentiality

The Greenvolt Group implements technical information security measures in line with the best market practices and develops internal processes and procedures to ensure that data processing takes place under appropriate security conditions in view of the risks involved.

It is through these mechanisms that Greenvolt Group companies ensure the confidentiality and integrity of personal data, limiting access to what is strictly necessary both internally and to subcontractors who process personal data in accordance with their guidelines. In addition, all data communications to entities outside Greenvolt only take place after all the information has been provided to the data subjects and duly substantiated under the terms of the applicable legislation.

4.7. Data Sharing

The data provided by the data subjects to the Greenvolt Group may be shared with other entities whenever the sharing is essential for the pursuit of the purposes of the data processing or whenever the Greenvolt Group is bound by a legal obligation that requires it. This sharing will be done through appropriate channels that guarantee the protection of the data subjects' data.

The Greenvolt Group may also share data with subcontractors provided that they comply with all current Data Protection legislation and the highest ethical standards.

In the course of its business, the Greenvolt Group may transfer personal data to third countries. This sharing of data will always be done in compliance with legal provisions, ensuring the necessary protection of data subjects.

4.8. Responsibility

All Greenvolt Group employees are responsible for ensuring compliance with these principles and must be aware, at all times, of the care that must be taken when processing personal data.

The Greenvolt Group companies have developed policies and procedures to guide their personal data processing practices and publicise them internally and on a regular basis. In addition, Personal Data Protection Officers have been appointed who are available to data subjects, also ensuring interactions with the competent authorities, and who can be contacted via dpo@greenvolt.com.

5. Final Provisions

The *Compliance* Area is responsible for monitoring the application of this Policy, as well as for reviewing it every two years or whenever there are relevant changes in the applicable legal framework and in the context of the activities carried out by Greenvolt, or whenever new elements arise that demonstrate that it is not fully appropriate, submitting the proposed changes to the CEO of the Greenvolt Group for approval.

Any changes to this Policy must be approved by the Board of Directors of Greenvolt Group, with the power to delegate to the Managing Director, with regard to changes necessary to comply with the internal procedures established in this area.

This Policy shall enter into force on the date of its approval.