

PERSONAL DATA PROTECTION POLICY

Ineco, a reference engineering and consultancy company in sustainable mobility and digital transformation, is aware of the obligation to comply with the legislation in force at all times regarding the protection of personal data. Accordingly, it declares the commitment of its Management to the rights in this area of all individuals related to the organization, respecting the right to honour and privacy in the processing of the different types of personal data that may be necessary due to the nature of the company's activities.

In order to achieve this purpose, Ineco assumes and promotes the following **basic principles**, within the framework of reference in the development of its activity.

- **Principles of legitimacy, lawfulness and fairness in the processing of personal data:** The processing of personal data shall be legitimate, lawful and fair in accordance with the applicable legislation. In this sense, personal data must be collected for one or more specific and lawful purposes, in accordance with the applicable legislation. In cases where it is mandatory under such legislation, the consent of the data subjects must be obtained prior to collecting their data. In particular, no personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, health, or genetic or biometric data for the purpose of uniquely identifying a natural person will be collected or processed, unless the collection of such data is necessary, legitimate and required or permitted by applicable legislation, in which case they will be collected or processed. The collection of such data is necessary, legitimate and required or permitted by the applicable legislation, in which case they will be collected and processed in accordance with the provisions of the aforementioned legislation.
- **Principle of minimisation:** Only personal data that are strictly necessary and appropriate for the purpose for which they are collected or processed and suitable for that purpose will be processed.
- **Principle of accuracy:** Personal data must be accurate and up to date. Otherwise, they must be erased or rectified.
- **Principle of storage limitation:** Personal data will not be kept beyond the period necessary to achieve the purpose for which they are processed, except in the cases provided for by law.
- **Principles of integrity and confidentiality:** The processing of personal data shall ensure, through technical or organizational measures, adequate security to protect them from unauthorized or unlawful processing and to prevent their loss, destruction or accidental damage.
- **Accountability:** To demonstrate compliance with all these principles, a register of activities shall be kept describing the processing of personal data carried out as part of the company's activities, as well as a risk analysis for each processing of personal data carried out, in order to determine the measures to be applied to ensure that these data are processed in accordance with legal requirements.

Ineco is committed to spreading this policy and making it available to all stakeholders, promoting and ensuring its compliance.

April 8th, 2022

Sergio Vázquez Torrón
Chairman