



PERSONAL DATA PROTECTION POLICY

Ineco senior management states its commitment to comply with the current legislation on data protection, in order to guarantee the right to data protection of every person related with the company, ensuring respect for the rights to honour and privacy in the processing of the personal data necessary for the company business activity.

To achieve this purpose, Ineco assumes and promotes the following basic principles, which are a reference framework in the development of its activity:

- **Lawfulness, fairness and transparency principles:** personal data shall be processed lawfully, fairly and in a transparent manner according to the current legislation. Personal data shall be collected for specified, explicit and legitimate purposes. When it is mandatory according to the current legislation, consent should be obtained before collecting the personal data. Especially, processing of personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Additionally, the processing of genetic and biometric data for the purpose of unambiguously identifying a person, data concerning to health or data concerning a natural person's sexual life or orientation shall be prohibited. Only in case of this data processing is necessary, fairly, required or allowed by the current legislation, it will be collected and processed, always according to the law.
- **Data minimization principle:** personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy principle:** personal data shall be accurate and, when necessary, kept up to date; otherwise they should be erased or rectified.
- **Storage limitation principle:** personal data shall be kept for no longer than is necessary for the purposes for which the personal data are processed, except for the cases contemplated in the current legislation.
- **Integrity and confidentiality principles:** personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- **Accountability principle:** The company shall be responsible for, and be able to demonstrate compliance with all these principles, executing a logging of actions which describes the processing made as a part of the activities of the company, as well as a risk assessment for every processing, with the purpose of establishing the security measures necessary to guarantee the processing is according to the current legislation.

Ineco senior management wants to express its knowledge and approval of this policy, and the commitment to its distribution through the publication on intranet and the corporate website, so all the personal is aware of it, assuming it as part of their job duties, thus complying with the policy and the rules and procedures elaborated as development of it.

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Carmen Libroero Pintado
President