

Personal data protection policy

The board of directors of Ercros, at its meeting on 17 December 2021, and with the favourable report of the appointments, remuneration, sustainability and corporate social responsibility committee, has unanimously approved this Personal data protection policy, which aims to guarantee the right to data protection for all natural persons who interact with the Ercros Group, ensuring respect for the right to honour and privacy in the processing of the different types of personal data.

The principles on which this policy is based are as follows:

- a) Personal data shall be processed fairly and lawfully, in accordance with applicable legislation. When required by law, the consent of the data subjects must be obtained before collecting their data.
- b) The acquisition and obtaining of personal data from illegitimate sources, from sources that do not sufficiently guarantee their lawful origin, or from sources whose data have been collected or transferred in violation of the law is prohibited.
- c) Personal data may only be collected for the fulfilment of the explicit and legitimate purpose for which they were collected and may not be used for purposes incompatible with that original purpose.
- d) Only data that is adequate, relevant, and not excessive in relation to the determined, explicit, and legitimate purposes for which it was obtained may be processed.
- e) Personal data shall be accurate and kept up to date to truthfully reflect the current situation of the data subject. Otherwise, it must be deleted or rectified.
- f) Personal data shall be erased when it is no longer necessary or relevant for the purpose for which it was collected or recorded, except in cases provided for by law.
- g) The processing of personal data shall ensure, through technical or organizational measures, adequate security to protect the data against unauthorized or unlawful processing and to prevent accidental loss, destruction, or damage.
- h) Personal data collected and processed by the Group companies shall be kept strictly confidential and secret, may not be used for purposes other than those that justified and allowed its collection, and may not be disclosed or transferred to third parties except in cases permitted by applicable law.
- i) The processing of personal data shall be transparent for the data subject, providing information about the processing of the data in a clear and accessible manner. Data subjects whose data are intended to be collected shall be informed of the circumstances of the processing in accordance with applicable legislation.

- j) Data subjects shall be allowed to exercise their rights of access, rectification, erasure, restriction of processing, data portability, and objection, where applicable, by establishing the internal procedures necessary to meet the legal requirements in each case.

Antonio Zabalza Martí
Chairman and CEO of Ercros

Barcelona, 17 December 2021
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