

# Data protection policy





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Sener is fully committed to complying with the applicable personal data protection laws in every area of its activity.

The purpose of this Policy is to establish the general principles and guidelines that must govern Sener's actions in the area of personal data management and protection to ensure compliance with the applicable laws.

This Policy guarantees all individuals who interact with Sener the right to the protection of their data, ensuring respect of the right to honour and privacy in the processing of the different types of personal data originating in different sources and for various purposes, depending on their business activity. All of the above is consistent with Sener's Code of Conduct and corporate policies.

## 1. Scope of application

This Policy applies to all the companies that make up the Sener group, as well as to all the people who interact with the company (employees, customers, suppliers, collaborators, etc.).

Sener undertakes to fully comply with the laws within its jurisdiction in the field of data protection, that which is applicable to the personal data processing that is carried out, and that determined in accordance with the rules or agreements adopted by Sener.

Sener will also ensure that the principles set out in this Policy are taken into account: (i) in the design and implementation of every procedure that involves the processing of personal data; (ii) in the products and services offered; (iii) in all the contracts and obligations it enters into with natural and legal persons; and (iv) in the implementation of any systems and platforms that allow access - by Sener or third-party professionals - to personal data and the collection or processing of said data.

## 2. Basic principles relating to the processing of personal data

The principles relating to the processing of personal data on which this Policy is based are as follows:

- **Principle of legitimacy, legality and fairness in the processing of personal data.**

The processing of personal data shall be legitimate, lawful and fair, in accordance with the applicable laws. In this regard, personal data must be collected for one or more specific and legitimate purposes.

In cases where it is mandatory, the data subjects' consent must be obtained before collecting their data.

Similarly, when required by law, the purposes for processing personal data will be

explicit and determined at the time of collection.

Specifically, Sener will not collect or process personal data relating to ethnic or racial origin, political ideology, beliefs, religious or philosophical convictions, sex life or orientation, trade union membership, health, or genetic or biometric data aimed at unequivocally identifying a person, unless the collection of the aforementioned data is necessary, legitimate and required or permitted by the applicable law, in which case they will be collected and processed in accordance with the provisions of said law.

- **Principle of minimisation.**

Only personal information that is strictly necessary and adequate for the purposes for which it was collected will be processed.

- **Principle of accuracy.**

Personal data must be accurate and kept up to date. Otherwise, such information must be deleted or corrected.

- **Principle of limitation of data storage period.**

Personal data will not be kept longer than is necessary to achieve the intended purpose. Once the intended purpose is achieved, the data may only be kept, duly blocked, for the periods allowed by law to deal with potential legal claims or requirements.

- **Principles of integrity and confidentiality.**

Personal data will be protected by adopting technical and organisational measures that seek to avoid any unauthorised or unlawful use, loss, destruction of information or accidental damage.

To this end, Sener will periodically assess the risk levels of the processing carried out in order to determine the specific measures that must be applied to ensure that personal data are processed as required by law. In addition, a record of the technical and organisational measures adopted will be kept and periodically reviewed so that the security and protection of the information can be guaranteed at all times.

The personal data collected and processed by Sener must be stored in conditions of absolute secrecy, and cannot be used for purposes other than those that justified and allowed their collection. The data may not be disclosed or transferred to third parties except as permitted by the applicable law.

- **Principle of proactive responsibility.**

Sener will be responsible for complying with the principles set out in this Policy and those required by the applicable laws, and must be able to demonstrate this when required by the applicable laws. To this end, Sener has established various technical and organisational measures aimed at enforcing the data protection obligations applicable to the company.

Sener has also appointed a Data Protection Officer, who supervises compliance internally with data protection laws and advises any interested parties to avoid any type of non-compliance with or violation of data protection rights.

- **Principles of transparency and information.**

Personal data are processed transparently in relation to the data subject, who is given understandable and accessible information on the processing of their data.

- **Data subjects' rights.**

Sener allows data subjects to exercise their rights of access, rectification, deletion, limitation of processing, portability, objection, and revocation of consent. To this end, the company has established adequate means to comply with obligations related to the exercise of data protection rights.

Data subjects may exercise their rights by sending an email to [data.protection@sener.es](mailto:data.protection@sener.es).

- **Privacy by design and by default.**

Sener complies with privacy principles through design, evaluating beforehand any risks that new projects, services or information systems may entail for personal data protection, and adopting the measures needed to eliminate or mitigate these risks as much as possible.

- **Contracting of data processors.**

To ensure that Sener selects and contracts the right third parties to provide data processing services, it first takes measures to ensure that vendors comply with data protection regulations.

In any case, Sener contractually regulates the obligations of vendors that provide data processing services, as required by the applicable data protection laws.

- **International data transfers.**

Any processing of personal data that involves sending personal data outside the European Economic Area must be carried out in strict compliance with the requirements laid out in the applicable data protection laws. In these cases, Sener takes the measures needed to ensure the adequate protection of the data transferred.

### 3. Implementation, control and evaluation

The Compliance Department at Sener, together with the Data Protection Officer, guarantee the effective fulfilment of this Policy and enforce the principles and obligations set out in the applicable data protection laws.

Sener undertakes to conduct periodic external audits to review the level of compliance with this Policy and all the obligations required in the area of personal data protection. In addition, the results of these audits are submitted to Senior Management, so that it can carry out the relevant leadership and control functions.

Sener's Data Protection Officer can be contacted at any time by writing to [dpd@sener.es](mailto:dpd@sener.es).

*This Policy was approved by the Sener Board of Directors on 24<sup>th</sup> July 2024.*



[www.group.sener](http://www.group.sener)