

## DATA PROTECTION AND PRIVACY POLICY

### 1. STOCK IBÉRICO's undertaking

STOCK IBÉRICO makes a fundamental commitment to its Stakeholders to uphold their privacy and protect their personal data.

STOCK IBÉRICO encourages you to read this Privacy Policy and its respective updates.

### 2. Entity in charge of data processing and entity entrusted with data protection

The entity in charge of collecting and processing your personal data will be STOCK IBÉRICO, who will inform you about its activity, provide you with the service or supply the product and in this framework will decide what data will be collected, the means of data processing and the purposes for which the data will be used.

STOCK IBÉRICO also has a Data Protection Officer (DPO), who (i) will monitor compliance of the data processing techniques with applicable standards, (ii) is a point of contact with the Stakeholder for any clarifications (iii) will cooperate with the supervisory authority, (iv) will provide information and advise the data processing controller or subcontractor of their obligations in the framework of privacy and data protection.

### 3. Personal data, personal data owners and categories of personal data

#### What is personal data??

Personal Data is any information of any nature and in any medium, relating to an identified or identifiable natural person. A person is considered to be identifiable if they can be directly or indirectly identified, for example by means of their name, identification number, location data, electronic identifier or other elements that make it possible to identify that natural person.

#### Who are the owners of personal data?

The Stakeholder - a natural person, to whom the data relates and who has used STOCK IBÉRICO's services or products. For example, a stakeholder of STOCK IBÉRICO will be a contact person with whom a contract has been signed to supply a good or provide a service. The group of Stakeholders also includes contact persons who may be the target of advertising campaigns or promotional offers from STOCK IBÉRICO, as well as those who request information about the products and services commercialised by STOCK IBÉRICO.

In this regard, STOCK IBÉRICO hereby informs that it also protects the personal data and respects the rights of these stakeholders.

**What categories of personal data do we process?** Identification and contacts (Name; company; address; telephone; mobile phone; fax; email; job position).

### 4. Grounds, Purposes and Duration of the Processing of Personal Data

#### On what grounds can STOCK IBÉRICO process your personal data?

Consent: When you have given your express prior consent - in writing, orally or through the validation of an option - and if such consent is free, informed, specific and unambiguous. Examples are your consent to sending direct marketing messages, setting profiles, recording calls; or

Contract execution and pre-contractual procedures: when the processing of personal data is necessary for signature, execution and management of the contract signed with STOCK IBÉRICO, e.g. for information requests, preparation of service proposals, provision of services, management of contacts/complaints, billing/collection/payments; or

Compliance with a legal obligation: when the processing of personal data is necessary to comply with a legal obligation to which STOCK IBÉRICO is bound, e.g. the communication of data to the police or judicial authorities or fiscal or regulatory entities; or

Legitimate interest: where the processing of personal data corresponds to a legitimate interest of STOCK IBÉRICO or third parties, e.g. improvement of the quality of service, detection of fraud, when the reasons for its use should prevail over the rights of data owners).

#### **For what purposes and for how long will STOCK IBÉRICO process your personal data?**

Your personal data will be processed by STOCK IBÉRICO solely during the period of time that is necessary to achieve the defined purpose or, depending on the applicable context, until you exercise your right of opposition, the right to be forgotten or withdraw your consent. Once the respective conservation period has expired, STOCK IBÉRICO will eliminate the data or render it anonymous, unless the data must be kept for a different purpose that may still persist.

When there is a legal or contractual obligation to be complied with, failure to provide personal data may originate a breach of the obligation in question.

#### **What are the deadlines for processing and keeping personal data?**

STOCK IBÉRICO processes and stores your personal data in conformity with the purposes for which it is processed. There are cases in which the law requires the processing and storage of data for a minimum period of time, for example data necessary for informing the Tax Authorities for accounting or tax purposes, or data relating to commercial bookkeeping, that must be kept for 10 years, and data for the purpose of combatting money laundering and terrorist financing, that must be kept for 7 years.

But, where there is no specific legal obligation, then the data will be processed only for the period necessary to fulfill the purposes that led to the initial data collection and preservation and always in accordance with the law, guidelines and decisions of the CNPD.

Hence:

STOCK IBÉRICO will process and maintain your personal data for the period in which it maintains a contractual relationship with you.

Regarding video surveillance of its premises, STOCK IBÉRICO will only keep the recordings of images and your personal data for a maximum period of 30 days.

STOCK IBÉRICO may maintain other personal data for periods longer than the duration of the contractual relationship, either based on your consent, or to ensure rights or duties related to the contract, or because it has legitimate interests that justify this, but always for the limited period that is strictly necessary for achievement of the respective purposes and in accordance with the guidelines and decisions of the CNPD.

## **5. Form and timing of the collection of personal data**

#### **When and how will we collect your personal information?**

We collect personal data, subject to your consent, or within the framework of commercial relations established with STOCK IBÉRICO.

The data collection can be achieved orally, in writing or via STOCK IBÉRICO's website.

## **6. Rights of the personal data owner**

#### **What are your rights?**

Right of Access - right to obtain confirmation of which of your personal data is processed and information thereof, for example, what are the purposes of the data processing, what are the conservation periods, among others.

Right to see / hear or obtain a copy of the data, for example of invoices, written agreements or calls in which you are an intervening party and which are recorded.

Right of Rectification - right to request rectification of your personal data that is inaccurate or request that incomplete personal data be completed, such as the address, taxpayer ID number (NIF), email, telephone contacts, or others.

Right to erase the data or "right to be forgotten" - right to erase your personal data, provided that there are no valid grounds for its conservation, e.g. cases in which STOCK IBÉRICO has to keep the data to comply with a legal obligation or because a legal process is under way.

Right to Portability - right to receive the data you have supplied to us in a currently used digital format and with automatic reading, or request direct transmission of your data to another entity that will become the new entity in charge of your personal data, but in this case only if this is technically possible.

Right to Withdraw Consent or Right of Opposition - right to oppose storage of the data, or withdraw consent, at any time of data processing, e.g. in the case of data processing for marketing purposes, provided that no legitimate interests exist which prevail over your interests, rights and freedoms, such as defending a right in a judicial process.

Right of Limitation - right to request the limitation of the processing of your personal data, in the form of: (i) suspension of processing or (ii) limitation of the scope of processing to certain data categories or processing purposes.

Automated Profile and Decisions - STOCK IBÉRICO can profile stakeholders, e.g. on the basis of their preferences or personal interests, in particular to provide services, increase the quality and experience of products and services, or tailor direct marketing communications, provided that such processing is necessary for the signature or execution of the contract between the data owner and STOCK IBÉRICO or is based on the consent of the data owner.

When the processing of personal data, including processing to set profiles, is exclusively automatic (without any human intervention) and may have effects on your legal sphere or significantly affect you, you shall be entitled not to be subject to any decision based on that automatic processing, except for the exceptions provided by law, and shall have the right to ensure that STOCK IBÉRICO takes appropriate measures to safeguard your rights and freedoms and legitimate interests, including the right to have human intervention in STOCK IBÉRICO's decision making process, the right to express your point of view or contest the decision taken on the basis of the automatic processing of personal data.

Right to complain - right to complain to the supervisory authority, CNPD, in addition to the company or to the DPO.

#### **How can you exercise your rights?**

The exercise of rights is free of charge, except in the case of a manifestly unfounded or excessive request, in which case a reasonable fee may be charged in function of the costs.

The information shall be provided in writing but may be given orally if requested. In this case, STOCK IBÉRICO must verify your identity by means other than an oral check.

The response to requests shall be provided within a maximum of 30 days, unless it is a particularly complex request.

Please send requests to the following address: [rgpd@stockiberico.com](mailto:rgpd@stockiberico.com)

## **7. Transmission of Personal Data**

### **Under what circumstances will your personal data be communicated to other entities, subcontractors or third parties?**

Your data may be transmitted to subcontractors for them to handle in the name, and on behalf of, STOCK IBÉRICO. In this case, STOCK IBÉRICO will take the necessary contractual measures to ensure that the subcontractors respect and protect the stakeholder personal data.

Data may also be transmitted to third parties - entities other than STOCK IBÉRICO or subcontractors - if the data owner has provided its consent to this effect, or to entities to whom the data must be communicated by law, such as the tax authority.

### **Under what circumstances will STOCK IBÉRICO transfer your data to a third country?**

STOCK IBÉRICO may have to transfer your personal data to a third country outside the European Union, which is not included in the list of countries that the EU has already considered to meet adequate levels of personal data protection. In such cases, STOCK IBÉRICO will ensure that data transfers are carried out in strict compliance with applicable legal standards.