

## **Personal Data Protection Policy for Clients of Altamar Advisory Partners S.L.**

### ***Processing of the personal data of legal representatives***

ALTAMAR ADVISORY PARTNERS informs you that it will process the personal data of the CLIENT's legal representatives, agents, or contact persons that hold positions within the organisations of the signatory parties, or the data of other persons that ALTAMAR ADVISORY PARTNERS may have knowledge of, exclusively to provide the services that are the subject of this Offer, and including processing occurring on mobile devices or outside the cited Company's premises, solely and exclusively to manage and comply with the obligations and rights derived from this agreement. It will also perform disclosure or transfer of that data, to the extent that this may be necessary for full implementation of the legal relationships that the parties are formalising under the scope of this document. That data will be stored by ALTAMAR ADVISORY PARTNERS for a period of 10 years, which will run from when the contractual relationship with ALTAMAR ADVISORY PARTNERS ends.

ALTAMAR ADVISORY PARTNERS will, at all times, comply with the applicable legislation on the subject of processing, storage, and protection of the personal data obtained as a result of this Offer, and the data subjects for that data may exercise their rights to access, rectify, and erase in relation to that data; to oppose or restrict its processing; to data portability; and to oppose being subject to automated individualised decision-making, by sending a request to the Data Protection Officer at Paseo de la Castellana, 91, 28046, Madrid, Spain, making reference to 'P.D.' on the envelope, or by email using the address [dpo@altamarcam.com](mailto:dpo@altamarcam.com).

### ***Processing of the CLIENT's personal data***

Many of the professional services provided by ALTAMAR ADVISORY PARTNERS do not involve any processing of personal data, except for the personal data of the CLIENT's legal representatives as described in the previous paragraph for management of the contractual relationship itself. However, in cases where as a result of providing the Services established in the Offer, ALTAMAR ADVISORY PARTNERS gains access to personal data for which the CLIENT is responsible, the CLIENT will be considered as the 'Data Controller' and ALTAMAR ADVISORY PARTNERS will act in the capacity of the 'Data Processor' with respect to processing of the personal data of the CLIENT. In relation to this, ALTAMAR ADVISORY PARTNERS is expressly declaring its commitment to:

- Process any data to which it may gain access in accordance with the Offer, the instructions provided by the CLIENT, and Data Protection legislation. ALTAMAR ADVISORY PARTNERS will not use or apply the data for any purpose other than the one appearing in the Offer. If ALTAMAR ADVISORY PARTNERS believes that any of the instructions may violate any provision on the subject of data protection, it will immediately notify the CLIENT for that reason.
- Maintain confidentiality and a duty of secrecy for any data of which it may become aware in the course of its involvement with the contracted products. ALTAMAR ADVISORY PARTNERS warrants that all its employees will receive training and warnings regarding the obligations that are contained in this Offer even after this agreement has been finalised for any cause. It is also obligated to comprehensively

inform its employees about any obligations on the subject of security that may be applicable to the service being provided.

- Maintain a written register of all categories of processing activities carried out on behalf of the CLIENT, which contains:
  - The name and contact information of the data processor(s) and each data controller on behalf of which that processor is acting, and as applicable, of the legal representative of the data controller or processor, and of the Data Protection Officer.
  - The categories of processing being carried out on behalf of the data controller.
  - A general description of the appropriate technical and organisational security measures being applied.
- Provide notification by email, as soon as possible and to the address indicated in the agreement, in any case where ALTAMAR ADVISORY PARTNERS receives a request for exercise of the rights to access, rectify, or erase in relation to personal data, or the right to oppose or restrict its processing, or the right to data portability.
- Provide notification regarding any security violations that take place in relation to the personal data it is processing, without undue delay and in all cases within a period of 60 hours after it becomes aware of them, using the CLIENT's email address indicated in the agreement and including all information that may be relevant in relation to documentation and disclosure of the incident.
- Notify the CLIENT if all or some of the services subject to the agreement are subcontracted to another data processor. If ALTAMAR ADVISORY PARTNERS decides to make use of a sub-processor to carry out specific processing activities on behalf of the CLIENT, it will ensure that the sub-processor is subject to the same data protection obligations as those stipulated for ALTAMAR ADVISORY PARTNERS.
- Adopt the security measures necessary to protect the CLIENT's data, in accordance with Data Protection legislation, and after taking into account the state of the technology, the data, and the risks to which that data could be exposed, to ensure the confidentiality, integrity, availability, and ongoing resilience of the processing systems and services. In relation to this, and upon request from the CLIENT, ALTAMAR ADVISORY PARTNERS will inform the CLIENT regarding: (i) the means expected to be used for the data processing and (ii) the specific security measures implemented based upon the risk analysed.
- Make all information necessary to demonstrate compliance by ALTAMAR ADVISORY PARTNERS with its obligations, as well as to allow performance of audits or inspections by the data controller or by another auditor the data controller has authorised available to the data controller.
- Once the services have been concluded, ALTAMAR ADVISORY PARTNERS will destroy that data, as well as any media elements or documents that contain any of the personal data provided by the CLIENT, except for those that must be preserved as a

result of provision of the services or as supporting documentation for them, or as required by law.