

# Privacy Policy

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Policy

Version: 2.0

**Owner:**

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**Scope:**

Global

The version in force is that published on BIC

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# Privacy Policy

Indra Group (Indra) recognizes the importance of guaranteeing the appropriate processing of personal data and considers its protection to be a fundamental aspect for the company. For this reason, data protection is integrated as an essential part of the processes that involve data processing and the organization's strategic planning.

The purpose of the Indra Data Privacy and Protection Policy (Privacy Policy), together with the Personal Data Protection Manual, is to guarantee the effective and uniform protection of personal data in all the activities of the company. This Privacy Policy is mandatory and to be complied with by all Indra companies.

The following principles are established to achieve these objectives:

- The personal data processed must be suitable, pertinent and not excessive, and be gathered for explicit and legitimate purposes. Likewise, the personal data may not be processed in a manner incompatible with these purposes, and must be kept up-to-date at all times, ensuring the retention period is reduced to the minimum necessary.
- When collecting such data, Indra will comply with the information rights of data subjects, providing at least the following information:
  - The company's identity.
  - Of the purpose for which the processing is to be carried out.
  - Of the recipients to which the personal data are to be transferred.
- Indra only processes personal data in the following cases:
  - After obtaining free, explicit, unequivocal, and informed consent from the data subject, the company will provide the necessary simple means to revoke it.
  - Where a legitimate interest of the company justifies the processing, as long as the legitimate interests, rights or freedoms of the parties concerned do not prevail.
  - When processing is required for the maintenance or fulfillment of a legal relationship between the company and the data subject.
  - When processing or assignment responds to compliance with an obligation imposed by applicable national legislation or is undertaken by an Authority or Public Sector as required, in the legitimate exercise of its competences, guaranteeing the full right to privacy of data subjects.
  - When there are exceptional situations that endanger the life, health or safety of the data subject or of other people or groups.
- As a general rule, the processing of sensitive data or information that affects the private life of a data subject should be avoided. If done, special attention must be paid to the applicable legal requirements and the security measures to be implemented.

In general, sensitive data refers to information about the data subject's health, sexual orientation, DNA-related, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and biometric data used to identify a data subject.

- Indra implements the necessary security measures, which are based on prestigious standards. These measures aim to guarantee the confidentiality, integrity and availability of personal data and are governed by the mandatory framework of Indra's Information Security Policy.
- The people who have access to personal data due to their professional performance at Indra are required to comply with the strictest duty of secrecy, in addition to the obligations described in the Code of Ethics published by the company for this purpose, an obligation that is still in place even after the end of their relationship with it.

**Administration model**

Indra has established a Data Protection and Privacy Governance Model that ensures coordination between its organizational units and management managed through the Data Protection Delegate (DPO).

The DPO is responsible for supervising and ensuring compliance with the regulations, handling the rights of the data subjects and collaborating with the competent control authorities (e.g. the Spanish Data Protection Agency).

This position is part of Indra's legal area and advises on the correct implementation of controls and procedures to minimize privacy risks arising from the processing of personal data

Additionally, the DPO reports independently, at least annually, to the Audit and Compliance Committee (ACC) and the Risk Coordination Unit (UCR).

**Channel to exercise rights and report incidents**

Data subjects may exercise their rights to access, correction, suppression, opposition, portability and restriction of processing (or any others recognized by Law) by sending an email to [dpo@indra.es](mailto:dpo@indra.es)

**Approval**

Through the approval of this Privacy Policy, the Board of Directors states its determination and commitment to reaching a suitable level of security, according to the corporate needs, and guaranteeing the homogeneous protection of data across all Indra Group companies.

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