

1.- Personal Data Protection Policy

This policy is constituted as an Annex to the Information Security Policy of the ISO/IEC 27001:2017 standard, covering the specific part on Information Privacy (ISO/IEC 27701:2019 standard).

OpenSistemas is deeply committed not only with Information Security, but also with its Privacy. This commitment covers, obviously and as it could not be otherwise, with compliance with Spanish and European regulations on personal data protection, and ensures full compliance with the established obligations, as well as the implementation of security measures provided in **the General Data Protection Regulation (GDPR) (EU) 2016/679 and Organic Law 3/2018, of December 5, on data protection and digital rights (LOPD and GDD, hereinafter LOPD)**. In addition, we also consider the legislation in force in the countries where we have presence such as the Statutory Law 1581 of 2012 and other related provisions, such as Decree 1377 of 2013 in Colombia.

The management of OpenSistemas, within the framework of its general and non-delegable competence to determine the general policies and strategies of the OpenSistemas Group, and after review and proposal by the competent persons, has approved this Information Privacy Policy (hereinafter, the "Policy").

The Code of Conduct of the OpenSistemas Group (hereinafter "the Code of Conduct") is the internal rule that forms the basis of this Compliance Model.

This Policy is aligned with the values of integrity (honesty and transparency) promulgated in the Code of Conduct and constitutes a development of one of its behavioral guidelines with the Market: the one related to the protection of Information Privacy and, therefore, of personal data.

Consequently, this Policy and its Annexes must be read and interpreted in conjunction with this Code of Conduct and the other policies of the OpenSistemas Group.

2.- Purpose of the Policy

The objectives of this Policy are:

2.1. To establish the fundamental principles and obligations imposed by the regulations on the protection of personal data to the companies and individuals that make up the OpenSistemas Group.

2.2. Set the guidelines to be followed in the Group to ensure the Privacy of Information of the data of customers, suppliers, employees and, in general, of all groups of data involved, identifying the most appropriate basis of legitimacy for the processing of personal data carried out in accordance with current legislation. This Policy is complemented by the specific internal regulations that develop it and that are created according to the needs of the OpenSistemas Group in this area.

3.- Scope of application

This Policy is applicable to:

- All subsidiary or majority-owned companies with respect to which, directly or indirectly, effective control is exercised by Open Sistemas de Información Internet, S.L., taking into account their own characteristics. For the purposes of this document, all these companies are referred to as the OpenSistemas Group.
- The members of the administrative bodies, managers and employees of all the companies of the OpenSistemas Group referred to in the previous point, regardless of the territory in which they are located.
- Those third parties, individuals and/or legal entities, related to the OpenSistemas Group, in those aspects of the Policy that apply to them. In the case of activities that the OpenSistemas Group performs outside Spain, this Policy will be adapted to the most restrictive local legislation that, where appropriate, may be applicable.

3.1- General principles relating to the protection of the privacy of information

We understand as **personal data** any information that identifies or allows the identification of a natural person (e.g. and without claiming to be exhaustive: name and surname, DNI, NIF, Social Security number, telephone, address, video camera images...). Such information, which we need to process and use only to the extent necessary to provide our services, will always relate to natural persons. This involves all interested parties, including the customer.

In achieving and complying with the general principles relating to the protection of personal data included in this code of conduct OpenSistemas will be guided in its actions, with respect to personal data, by the following principles:

- They must be processed in a lawful, fair and transparent manner.
- They must be collected for specific purposes and limited to the purpose for which they were collected.
- They must be accurate and kept up to date at all times.
- The integrity and confidentiality of the data being stored must be guaranteed.
- They must be stored only for the time necessary for the purposes of processing; after this time, they must be deleted or blocked. For its compliance, a person in charge will be appointed who will attend to all the above principles, likewise this compliance extends to the entire company and the people who make up the OpenSistemas Group.

4.- Commitments of the OpenSistemas Group in terms of Information Privacy

As reflected in the principles of OpenSistemas Group expressed in its Code of Conduct, respect for legality, integrity, honesty, transparency and respect for the fundamental rights of individuals, are basic ethical principles that must govern any action of its members who are committed to maintain at all times a behavior in accordance with current regulations that may be applicable and, in particular, in relation to the protection of personal data.

OpenSistemas Group, by express will of the management, which is formalized in this Policy, expressly states its position of absolute respect for the privacy and integrity of individuals and its rejection of the violation of the principles relating to the protection of personal data included in the previous section, assuming the following commitments and obligations in the processing of personal data necessary to carry out its activity:

- Comply with legal requirements, regulations or those derived from international agreements that may be applicable, and align with internationally recognized standards and best practices in the field.
- To ensure that neither OpenSistemas Group companies nor their employees collect, process, store, retain, communicate or use personal data in a way that contravenes the aforementioned rules, respecting the legitimate rights of the owners of this data.
- Respect the right to privacy of individuals, protecting personal data entrusted in particular by:
 - its employees, processing under the legally established terms, their personal data and in particular, medical or economic data.
 - third parties related to the Group such as customers, suppliers, partners or institutions and the general public, including the personal data of third parties that must be managed as a result of the provision of IT services to customers.

In order to comply with these commitments and obligations, the OpenSistemas Group has adopted the following measures.

- To set up an organizational structure responsible for ensuring data protection.
- Develop, based on the regulation on personal data protection, internal regulations on the subject adapted to the activity carried out by the Group.
- Inform, train and raise awareness among personnel on the importance of complying with these regulations, from the moment they join the company, through information on GDPR and data protection provided as part of their Onboarding.
- Adapt the Group's existing policies and procedures to integrate personal data protection into the business processes of all areas, implementing technical and organizational measures that guarantee the security and confidentiality of the information handled by the Group in any area. All this in order to maintain an internal culture of compliance and integrity aligned with the principles stated in this Policy and in the Code of Conduct, to which any person wishing to work with the Group must necessarily adhere.

5.- Privacy governance model in the OpenSistemas Group

The **organisational structure for the protection of personal** data of which the Group is composed of the following bodies and persons in charge:

- The person in charge of security of the treatment is responsible for the following functions, among others:
 - To supervise that the data are treated properly, fairly and for a specific purpose.
 - Review the correct adequacy of personal data, thus responding to the veracity of the current situation of the affected person.
 - Control of personal data that are no longer necessary or relevant for the purpose for which they were collected, thus taking measures to ensure that they are no longer operational.

- Verify that, except in those cases in which the Law exempts this obligation, the prior, free and informed consent of the owner of the data for the processing of their data is obtained.
 - Verify compliance with the duty to provide information.
 - Respond to requests to exercise the rights of data subjects at: legal@opensistemas.com
 - Verify whether international transfers take place and whether there is the necessary security or legal basis for them to take place.
-
- OpenSistemas Group Security Committee; this committee will be permanently chaired by the Treatment Security Manager, the Data Protection Delegate, the Systems Manager, the Security Coordinator and the GIS Manager. From time to time, by area managers or any OpenSistemas employee as necessary, whose task is to address privacy and security issues of the Group from an integrated and joint perspective. This Information Privacy Policy was approved by Open Sistemas management on July 26th, 2024.