

# Integrated Policy on Information Security and Personal Data Protection

## 1. Introduction and Regulatory Framework

OPENSYSTEMAS is a company with an international scope, specialized in the provision of support, services, and solutions based on open-source technologies, through its business lines of Solutions, Managed Services, and Support.

Aware that Information Security and Information Privacy are essential elements for the organization's competitiveness, sustainability, and reputation, OPENSYSTEMAS has implemented an Information Security Management System (ISMS) in accordance with ISO/IEC 27001:2023, complemented by the Information Privacy requirements (PIMS) established in ISO/IEC 27701:2021.

This Integrated Policy establishes the general framework for the protection of information and personal data processed by the OpenSistemas Group, ensuring compliance with applicable regulations, including, but not limited to:

- Regulation (EU) 2016/679, General Data Protection Regulation (GDPR).
- Organic Law 3/2018 on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD).
- Statutory Law 1581 of 2012 and Decree 1377 of 2013 (Colombia).
- Law No. 19,628 (Chile).
- Law No. 1969/2002 (Paraguay).

- Federal Law on the Protection of Personal Data Held by Private Parties (LFPDPPP) (Mexico).
- Any other applicable legal and contractual provisions in the countries where OPENISTEMAS operates.

This Policy is aligned with the values of integrity, honesty, transparency, and respect for fundamental rights set out in the OpenSistemas Group Code of Conduct, and must be interpreted jointly with said Code and the other internal policies that develop it.

## 2. Purpose of the Policy

The purpose of this Policy is to:

- Establish the principles, commitments, and guidelines regarding Information Security and Personal Data Protection applicable within the OpenSistemas Group.
- Ensure the confidentiality, integrity, availability, traceability, and authenticity of the information processed by the organization.
- Ensure the lawful, fair, and transparent processing of the personal data of customers, suppliers, employees, and other interested parties.
- Comply with applicable legal, regulatory, contractual, and statutory requirements.
- Promote a culture of security, privacy, and continuous improvement at all levels of the organization.

## 3. Scope of Application

This Policy applies to:

- All subsidiaries or majority-owned companies over which OPENISTEMAS exercises effective control, directly or indirectly (hereinafter, the OpenSistemas Group).
- Members of the governing bodies, executives, and employees of the Group, regardless of their geographical location.
- Third parties, whether natural or legal persons, that maintain relationships with the OpenSistemas Group, in those aspects applicable to them.

When carrying out activities outside Spain, this Policy shall be adapted to applicable local legislation, always applying the most restrictive criterion in terms of security and data protection.

## 4. General Principles of Information Security and Privacy

### 4.1 Information Security

The OpenSistemas Group is governed by the following security principles:

- Protection of information assets against internal and external threats.
- Compliance with the security controls and measures defined in the ISMS.
- Proper communication and management of security incidents.
- Mandatory training and ongoing awareness of personnel regarding information security.
- Application of a continuous improvement approach based on risk analysis and treatment.

### 4.2 Personal Data Protection and Privacy

Personal data is considered to be any information that identifies or makes it possible to identify a natural person. The processing of such data shall be carried out in accordance with the following principles:

- Lawfulness, fairness, and transparency.
- Purpose limitation.
- Data minimization.
- Accuracy and updating.
- Integrity and confidentiality.
- Storage limitation.

Personal data shall be processed only for as long as necessary to fulfill the purpose for which it was collected, after which it shall be deleted or blocked in accordance with applicable regulations.

# 5. Commitments of the OpenSistemas Group

The OpenSistemas Group expressly commits to respecting legality and fundamental rights, assuming the following obligations:

- To comply with applicable legal, regulatory, and contractual requirements regarding information security and personal data protection.
- To ensure that personal data is not collected, processed, stored, disclosed, or used in violation of applicable regulations.
- To protect the personal data of:
  - Employees, including especially sensitive data such as medical or financial information.
  - Customers, suppliers, partners, institutions, and other third parties related to the Group's activities.
- To integrate security and privacy into all business processes through appropriate technical and organizational measures.
- To inform, train, and raise awareness among personnel from the time of their onboarding, including specific training on GDPR, data protection, and information security.

Failure to comply with this Policy may result in the application of the corresponding disciplinary measures, in accordance with current labor legislation.

# 6. Security and Privacy Governance Model

To ensure compliance with this Policy, the OpenSistemas Group has the following organizational structure:

## 6.1 Processing Security Officer

Their responsibilities include:

- Overseeing that personal data is processed lawfully and for a specific purpose.

- Verifying the adequacy and updating of personal data.
- Controlling the deletion or blocking of data that is no longer necessary.
- Verifying the existence of consent or another valid legal basis for processing.
- Ensuring compliance with the duty to inform.
- Handling requests for the exercise of data subject rights via: [legal@opensistemas.com](mailto:legal@opensistemas.com)
- Verifying the legality and security of international data transfers.

## 6.2 OpenSistemas Group Security Committee

A collegiate body responsible for addressing security and privacy matters in an integrated manner.

It is permanently composed of:

- Processing Security Officer.
- Data Protection Officer.
- Systems Manager.
- Security Coordinator.
- Integrated Management System (IMS) Manager.

Area managers or other employees may participate on an ad hoc basis when necessary.

## 7. Management Commitment

OPENSISTEMAS Management commits to:

- Providing the necessary resources for the proper functioning of the ISMS and the privacy management system.
- Facilitating the prevention of risks and damage to information assets.
- Promoting the continuous improvement of the implemented systems.

This Integrated Policy was approved by OpenSistemas Management on **January 9, 2026**, and is mandatory for all persons and entities included within its scope of application.