

## POLICY OF PROCESSING OF PERSONAL DATA

This Personal Data Protection Policy (hereinafter the "**Policy**") regulates the collection, storage, use, circulation and deletion of personal data by **WINGS MOBILE SPAIN, S.L.U.** (hereinafter "**WINGS MOBILE**"), of its active clients, and potential workers and suppliers, providing tools that guarantee the authenticity, confidentiality, protection and integrity of the information.

This Policy is structured following constitutional mandates, Spanish legislation and other complementary and concordant rules.

**WINGS MOBILE** will bear in mind that the personal data is the property of the people to whom they refer and that only they can decide on it and, therefore, it will use said data only for the purposes for which it is duly empowered within of its corporate purpose, respecting in any case the current regulations on the Protection of Personal Data.

### I. SCOPE OF THE POLICY

- It has been structured considering all the processes of **WINGS MOBILE**, according to its corporate purpose, so that it is known, implemented and complied with by its managers, employees, contractors and third parts, who must carry out some treatment of the personal data collected by it.
- Incorporates and develops strategies and actions for the disclosure of the rights of the holders, as well as for the training, implementation, monitoring and evaluation of the comprehensive program of personal data management of **WINGS MOBILE**, which includes processes of attention to the requests of the Headlines.
- **WINGS MOBILE** will define any action related to the protection of personal data in its committee of presidency, in accordance with the reports and approaches presented by the Personal Data Protection Officer.

### II. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

**WINGS MOBILE** incorporates in all its actions the respect for the protection of personal data and, therefore, it will be governed by the following principles:

- Legality Principle in data processing: Data processing is a regulated activity that must be subject to the provisions of the law and the other provisions that develop it.
- Principle of Purpose: The treatment must obey a legitimate purpose in accordance with the Political Constitution and the law, which must be informed to the Owner.

- Principle of Freedom: The treatment can only be exercised with the prior, express and informed consent of the Owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate releasing consent.
- Principle of Truthfulness or Quality: The information subject to treatment must be truthful, complete, exact, updated, verifiable and understandable. The treatment of partial, incomplete, fractional or misleading data is prohibited.
- Principle of Transparency: In the treatment, the Holder's right must be guaranteed at any time and without restrictions, from the person responsible for said treatment or from the Person in Charge, information about the existence of data concerning him.
- Principle of Access and Restricted Circulation: The treatment is subject to the limits derived from the nature of the personal data and from the constitutional and legal provisions. In this sense, the treatment can only be done by people authorized by the Owner and / or by the people provided for in the Law. Personal data, except for public information, may not be available on the Internet or other means of mass communication or disclosure, unless access is technically controllable to provide restricted knowledge only to the Holders or authorized third parts in accordance with the law.
- Principle of Security: The information subject to treatment by the person responsible for the Treatment or Person in Charge of the treatment referred to in the law must be handled with the technical, human and administrative measures that are necessary to grant security to the records, and prevent their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Principle of Confidentiality: All persons involved in the processing of personal data that are not public in nature are obliged to guarantee the reservation of the information, even after the end of their relationship with any of the tasks that comprise the processing, and may only perform supply or communication of personal data when it corresponds to the development of the activities authorized in the Law and in the terms thereof.

### **III. DEFINITIONS**

For the purposes of this document, the following terms and definitions apply:

Authorization: Prior, express and informed consent of the owner to carry out the processing of personal data.

- Privacy notice: Physical document, electronic or in any other format that is made available to the owner of personal data, for the treatment of these, which communicates to the owner the information regarding the existence of the information processing policies that The way to access them and the

characteristics of the treatment that is intended to give personal data will be applicable to you.

- Databases: Organized set of personal data that is the object of the treatment.
- Active customer: Natural person who receives the services of **WINGS MOBILE**.
- Potential customer: Natural person interested in receiving the services of **WINGS MOBILE**.
- Personal data: Any information linked or that may be associated with one or more determined or determinable natural persons.
- Public data: It is the data that is not semi-private, private or sensitive. Public data are considered, among others, data related to the civil status of people, their profession or trade and their status as a merchant or public servant. By their nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes, and duly executed judicial decisions that are not subject to reservation.
- Sensitive data: Sensitive data is understood to be those that affect the privacy of the Holder or whose improper use may generate its discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions , social or human rights organizations or those that promote the interests of any political part or that guarantee the rights and guarantees of opposition political parts, as well as data related to health, sexual life and biometric data.
- Person in charge of the treatment: natural or legal person, public or private, who by himself or in association with others, performs the processing of personal data on behalf of the person responsible for data processing.
- Supplier: Any natural person who provides any service to the Company by virtue of a contractual / obligatory relationship.
- Responsible for the treatment: Natural or legal person, public or private, that by itself or in association with others, decides on the data base and / or the treatment of the data.
- Worker: Any natural person who provides a service to the Company by virtue of an employment contract.
- Owner: Natural person whose personal data is being processed.
- Treatment of personal data: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

- **Transfer:** The data transfer takes place when the person responsible and / or in charge of the processing of personal data, located in Spain, sends the information or personal data to a recipient, who in turn is responsible for the treatment and is within or outside the country.
- **Transmission:** Processing of personal data that involves the communication thereof within or outside the territory of Spain when it is intended to carry out a treatment by the person in charge on behalf of the person in charge.
- **Data Protection Officer:** This is the role within **WINGS MOBILE**, which will have the function of monitoring and controlling the Policy under the control of the Presidency Committee.

#### **IV. SENSITIVE DATA**

Sensitive data is data that affects the privacy of the owner or whose improper use may generate its discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, social organizations, of human rights or that promotes the interests of any political part or that guarantees the rights and guarantees of opposition political parts as well as data related to health, sexual life and biometric data.

**WINGS MOBILE** will restrict the treatment of sensitive personal data to what is strictly indispensable and will request prior and express consent on the purpose of its treatment.

The data classified as sensitive may be used and processed when:

- The Owner has given his explicit authorization to said treatment, except in cases where, by law, the granting of said authorization is not required.
- The treatment is necessary to safeguard the Holder's vital interest and the latter is physically or legally incapacitated. In these events, the legal representatives must grant their authorization.
- The treatment refers to data that is necessary for the recognition, exercise or defense of a right in a judicial process.
- The treatment has a historical, statistical or scientific purpose, or within the framework of improvement processes, as long as the measures leading to the suppression of the identity of the holders are adopted.

#### **V. PERSONAL DATA OF CHILDREN AND ADOLESCENTS**

The treatment will ensure respect for the prevailing rights of children and adolescents. The data of children and adolescents may be subject to treatment by **WINGS MOBILE**, as long as the prevalence of their fundamental rights is not put at risk and unequivocally responds to the realization of the principle of their

best interest, whose Specific application will come from the analysis of each particular case, in accordance with the provisions of the constitution and in accordance with the code of childhood or minors. In accordance with the provisions of the legislation, the opinions of minors must be taken into account when performing any treatment on their data.

## **VI. CLASSIFICATION OF INFORMATION AND DATABASES**

The databases will be classified as follows:

- Databases with Sensitive Information: These are databases that contain sensitive data that may affect the Holder's privacy, such as political, religious, sexual orientation, among others. **WINGS MOBILE** restricts access to this type of information and can only be known by an authorized group of officials, in the event that this information is collected.
- Databases with Public Information: These are databases that contain public data classified as such according to the mandates of the law or the constitution and which are not classified as semi-private, private or sensitive data. The data relating to the civil status of individuals, their profession or trade, their capacity as a merchant or public servant and those that can be obtained without reservation are public, among others. By their nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes, duly executed judicial decisions that are not subject to reservation.

## **VII. RIGHTS OF THE PERSONAL DATA HOLDERS**

The Holders of personal data have the following rights:

- Know, update and rectify your data in front of those responsible or responsible for the treatment. This right will be exercised, among others, against partial, inaccurate, incomplete, fractional, misleading data, or those whose Treatment is expressly prohibited or has not been authorized.
- Request proof of the authorization granted to **WINGS MOBILE**, except when expressly excepted as a requirement for Data Processing in accordance with Spanish legislation.

## **VIII. AUTHORIZATION FOR DATA PROCESSING**

**WINGS MOBILE** will request authorization for the processing of personal data by any means that allows it to be used as evidence, such as a contract or a specific document for this purpose, in which it will inform the owner of the data, the following:

- The treatment to which your personal data will be subjected and its purpose.

- The rights that assist you as the Owner.
- The channels in which you can make inquiries and / or claims. The authorization of the Holder for the Treatment is not necessary when it is:
- Information required by a public, administrative or judicial entity in the exercise of its functions.
- Data of a public nature.
- Cases of medical or sanitary emergency.
- Data processing is carried out for historical, statistical or scientific purposes.
- Data related to the Civil Registry of people.

**WINGS MOBILE** will keep a copy and proof of the fulfillment of the duty of information, as well as the fulfillment of the duty to request the authorization of the Owner. When fulfilling the information duty, **WINGS MOBILE** will expressly inform the Holders that their rights are:

- Right to know, update and rectify your personal data.
- Right to request proof of the authorization granted for the Treatment.
- Right to request information regarding the use that has been made of your personal data.
- Right to file complaints with the competent authority.
- Right to revoke the authorization granted or the deletion of the data.

## **IX. PROCESSING OF PERSONAL DATA.**

The operations that constitute the processing of personal data by **WINGS MOBILE**, as the person in charge or in charge of it, will be governed by the following parameters.

- Personal Data related to human resource management. **WINGS MOBILE** will process the personal data of its employees, contractors and those who apply for vacancies, at three times: before, during and after the employment and / or service relationship. **WINGS MOBILE** will inform, in advance, the rules applicable to the treatment of personal data provided by the interested part, as well as those that are obtained during the selection process. Once the selection process is exhausted, **WINGS MOBILE** will report the negative result and deliver the personal data provided to unselected persons, unless the holders of the data in

writing authorize the destruction thereof, when the owner of the data is not selected. The information obtained by **WINGS MOBILE** regarding those who were not selected, the results of the psychotechnical tests and interviews, will be eliminated from their information systems, thus complying with the principle of purpose. **WINGS MOBILE** when contracting personnel selection processes with third parts will regulate in the contracts the treatment that must be given to the personal data delivered by the interested parts, as well as the destination of the personal information obtained from the respective process. The personal data and information obtained from the selection process regarding the personnel selected to work at **WINGS MOBILE**, will be stored in the personal folder, applying high levels and security measures to this information, due to the potential that such information contains data from sensitive character. The purpose of the delivery of the data provided by those interested in the vacancies of **WINGS MOBILE** and the personal information obtained from the selection process, is limited to participation in it; therefore, its use for different purposes is prohibited. **WINGS MOBILE** will store the personal data and personal information obtained from the employee selection process in a folder identified with the name of each one of them. This physical or digital folder will only be accessed and processed by the Human Resources Area and in order to manage the contractual relationship between **WINGS MOBILE** and the employee. The different use of the data and personal information of the employees will only proceed by order of the competent authority, or at the express request of the employee, provided that such authority lies. After the employment relationship, whatever the cause, **WINGS MOBILE** will proceed to store the personal data obtained from the selection process and documentation generated in the development of the employment relationship, in a central file, subjecting such information to high security measures and levels. , by virtue of the potential that labor information may contain sensitive data. **WINGS MOBILE** is prohibited from transferring such information to third parts, as such fact may configure a deviation in the purpose for which the personal data was delivered by its owners. The foregoing, except with prior written authorization that documents the consent of the owner of the personal data.

- Treatment of personal data of Shareholders. The data and personal information of the natural persons who come to have the status of shareholder of **WINGS MOBILE**, is reserved since it is registered in the books of commerce and has the character of reserve by legal provision. **WINGS MOBILE** will only use the personal data of the shareholders for the purposes derived from the existing statutory relationship.

- Treatment of personal data of Suppliers. **WINGS MOBILE** will only collect from its suppliers the data that is necessary, pertinent and not excessive for the purpose of selection, evaluation and execution of the contract that may take place. **WINGS MOBILE** will collect from its suppliers the personal data of its employees, which are necessary, pertinent and not excessive, which for security reasons must be analyzed and evaluated, taking into account the characteristics of the services contracted with the supplier. The sole purpose of the suppliers' employee personal data collected by **WINGS MOBILE** will be to verify the moral suitability and competence of the employees; therefore, once

this requirement is verified, **WINGS MOBILE** may return such information to the provider, except when it is necessary to preserve this data. **WINGS MOBILE** will verify that the requested data is necessary, pertinent and not excessive with respect to the purpose underlying the request for access to them.

- Treatment of personal data in contracting processes. The third parts that in contracting processes, alliances and cooperation agreements with **WINGS MOBILE**, access, use, process and / or store personal data of **WINGS MOBILE** employees and / or third parts related to said contractual processes, will adopt the pertinent provisions. in this standard, as well as the security measures indicated by **WINGS MOBILE** according to the type of personal data processed. **WINGS MOBILE** will verify that the requested data is necessary, pertinent and not excessive regarding the purpose of the treatment.
- Treatment of personal data of the community and clients. The collection of data from people that **WINGS MOBILE** treats in development of actions related to the community, will be subject to the provisions of this rule and will be aimed at promoting the goods and services of **WINGS MOBILE**, as well as to carry out social responsibility campaigns. For this purpose, **WINGS MOBILE** will previously inform and obtain the authorization of the data owners. Regarding customers, in addition to having the purpose of promoting and marketing the company's goods and services, the treatment will be carried out fundamentally to carry out all the necessary procedures for the purchase and sale of homes and the processes derived from said business as described in the data processing manual.

## **X. PROCEDURES FOR CONSULTATIONS, APPLICATIONS AND CLAIMS**

**WINGS MOBILE** will guarantee the right of access, consultation and claims, prior accreditation of the identity of the owner or successor in title, legitimacy, or the personality of its representative, making available to the latter, without cost or expense, in detail and in detail, the respective personal data, using electronic means of communication or others that it considers pertinent.

For this purpose, **WINGS MOBILE** will enable one or several means for the Holders, their heirs or representatives, to verify the existence of personal information that is registered in their databases, consult the Treatment that has been given to said information, know the purposes that justify this Treatment and request the update, rectification or deletion of this personal data. The information must be provided in its entirety and proof of effective attention to the query or claim must be kept.

Requests for consultation will be answered within a maximum term of ten (10) business days from the date of receipt. In the event that a request for consultation cannot be attended to within the aforementioned term, the interested part will be informed before the expiration of the term of the reasons why their query has



not been answered, which in no case may exceed five (5) business days following the expiration of the first term. The people to whom the information can be supplied are:

- The Holders, their successors in title or their legal representatives.
- Public or administrative entities in the exercise of their legal functions or by court order.
- To third parts authorized by the Holder or by Law. All claims must be addressed within a maximum term of fifteen (15) business days from the day following the date of receipt. If it is not possible to attend the claim in the indicated term, the reasons will be informed to the interested part and the date on which the response will be given will be indicated. In any case, the new date may not exceed eight (8) business days following the expiration of the term of fifteen (15) days. Before processing any claim, the identity of the claimant must be verified, who must be the Owner, his successor in title or his representative. If the claimant is not one of the persons indicated above, the claim will not be processed. A complete claim must contain, at least:
  - Identification of the Holder and the claimant (in case it is not the same Holder).
  - Description of the facts that give rise to the claim.
  - Physical or electronic notification address.
  - Documents and annexes that are intended to be asserted in the course of the claim.
  - Request or object of the claim.

If a claim is filed, but it is incomplete, that is, if it lacks essential elements to give it due process, within five (5) business days after receipt of the claim, the interested part must be requested to correct it. the claim.

If two (2) months elapse without the claimant rectifying the claim, it will be understood that he has withdrawn it.

If a claim is received, but you do not have the competence to resolve it, it must be sent to the appropriate part within a period not exceeding two (2) business days and the interested part will be informed of said situation.

When the deletion of data is requested, it cannot be done when:

- It is a legal or contractual obligation to keep such data.
- Keeping the data is essential to safeguard the interests of the Owner or the public interest.

- The deletion hinders or hinders the exercise of the functions of the administrative or judicial authorities.

When the revocation of the authorization is requested, the interested part must accurately report whether the revocation is total or partial. The revocation of the authorization is partial when the interested part states that he wishes to revoke the Processing of personal data for certain specific purposes such as advertising, contests, consumer studies, etc. The revocation of the authorization is total when it is requested that the Processing of personal data be stopped for all authorized purposes.

The Owner of personal data has the right, at any time, to request the deletion (deletion) of their personal data from **WINGS MOBILE** when:

- Consider that they are not being treated in accordance with the principles, duties and obligations provided in current regulations.
- They are no longer necessary or relevant for the purpose for which they were collected.
- The period necessary for the fulfillment of the purposes for which they were collected has been exceeded.
- The deletion implies the total or partial elimination of personal information in accordance with what is requested by the Owner in the records, files, databases or treatments carried out by **WINGS MOBILE**.

The right of erasure is not an absolute right and the person responsible for the processing of personal data may deny the exercise of it when:

- The Data Holder has a legal or contractual duty to remain in the database.
- The deletion of data hinders judicial or administrative actions related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- The data is necessary to protect the legally protected interests of the Holder to carry out an action based on the public interest or to fulfill an obligation legally acquired by the Holder.

Inquiries, claims, requests for modification, deletion and revocation made regarding personal data must be sent by entering **[www.wingsmobile.com](http://www.wingsmobile.com)**.

## **XI. CONTRACTS**

In labor contracts, **WINGS MOBILE** will include clauses in order to previously and generally authorize the processing of personal data related to the execution of the contract, which includes the authorization to collect, modify or correct, transfer in future moments, personal data of the holder, for effects such as contributions and payments to the social security system, parafiscal, etc. It is a duty of the employees and collaborators of **WINGS MOBILE** to know this Policy and to carry out all the conductive acts for its fulfillment, implementation and maintenance.

## **XII. SECURITY OF THE INFORMATION**

**WINGS MOBILE** will adopt all the technical, human and administrative measures that are essential to provide security to its databases, avoiding adulteration, loss, consultation, unauthorized or fraudulent access. Among others, the security measures adopted include, but are not limited to:

- Encrypt the provision of our services using security protocols.
- Establishment of contractual confidentiality clauses with employees that go beyond the duration of the contract.
- Implementation of security processes to verify the identity of people who access information either physically or electronically.
- Permanent updating of security measures to adapt them to current regulations.
- Adoption of firewall security systems and detection of unauthorized access.
- Periodic monitoring of suspicious activities and physical and electronic maintenance of the databases.
- Internal restriction of access to databases only to authorized personnel.

## **XIII. APPLICABLE GENERAL RULES**

**WINGS MOBILE** establishes the following general rules for the protection of personal and sensitive data, such as in the care of databases, electronic files and personal information:

- It will guarantee the authenticity, confidentiality and integrity of the information.

- It will take all the necessary technical measures to guarantee the protection of the existing databases. In cases where the infrastructure depends on a third part, it will ensure that the availability of information such as the care of personal and sensitive data is a fundamental objective.

- It will carry out audits and controls periodically to guarantee the correct implementation of the personal data protection law and other normal regulations.

- It will adopt the technical, human and administrative measures that are necessary to grant security to the databases, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access. For this, it has verification criteria so that the personnel authorized by the Company have passwords and users, in addition to the access profiles to the respective information.

- The education and training of officials, suppliers and contractors will be a fundamental complement to these Policies.

- The Data Protection Officer must identify and promote the authorizations of the Holders, the privacy notices, the notices on the entity's website, awareness campaigns, claim legends and other procedures to comply with the law. of personal data processing and other regulations that complement, modify or repeal it.

- The Management Committee will be the objective of executing and designing the strategy so that this Policy is complied with.

- Responsible for the treatment of personal data is "the natural or legal person, public or private, who by himself or in association with others, decides on the database and / or data treatment." In this way, the person in charge is the one who defines the purposes and means of the processing of personal data and guarantees compliance with the requirements of law, which in this case is **WINGS MOBILE**

- The person in charge of the processing of personal data is "the natural or legal person, public or private, who, by himself or in association with others, carries out the processing of personal data on behalf of the person responsible for data processing". This means that, for each data processing, their respective managers have been defined and that they act by precise instruction of a person in charge. The internal Managers are employees and collaborators of **WINGS MOBILE** while the external ones are natural or legal persons who process data that the entity supplies them for the performance of an assigned task (suppliers, consultants, etc.).

- In compliance with the legal duty established in the personal data protection law and the other normative regulations, regarding the need to assign direct responsibilities to a subject within the company, the role of Personal Data Protection Officer is created, headed by the Systems Department, which will

carry out its functions with the support of the Management Committee and the Legal Management. Therefore, said area will be responsible within **WINGS MOBILE** to adopt, implement and comply with the directives of the law on the protection of personal data and the other normal regulations and those that add or modify them.

#### **XIV. THE NATIONAL REGISTRY OF DATABASES**

In accordance with the provisions of the law on the protection of personal data and other normal regulations, **WINGS MOBILE** will independently register in the National Database Registry, each of the databases containing personal data whose treatment is carried out by part of the Company, and the registered information must be updated in the National Database Register when there are substantial changes to it.

#### **XV. TERMINATION OF TREATMENT**

Once the need for the processing of your data ceases, they may be removed from the **WINGS MOBILE** databases or archived in secure terms so that they are only disclosed when it is in accordance with the law. Said data will not be deleted despite the request of the owner, when the conservation of the same is necessary for the fulfillment of an obligation or contract.

#### **XVI. VALIDITY AND UPDATE**

This Policy becomes effective upon its approval by the Management Committee and its updating will depend on the instructions of said Committee, which will carry out periodic reviews of the correct execution of the Policy jointly with the Data Protection Officer of the company.

For the full and effective exercise of this right by all its clients, **WINGS MOBILE SPAIN, S.L.U.** has arranged the following means through which they may submit their requests: **[www.wingsmobile.com](http://www.wingsmobile.com)**