

# POLICY ON PERSONAL DATA PROCESSING

**CUPA**GROUP  
Since 1892

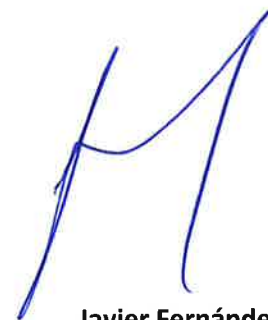


**CUPA GROUP** is fully committed to the correct processing of personal data pursuant to European Regulation 2016/679 and Spain's Organic Law on the Protection of Personal Data and Guarantee of Digital Rights 3/2018, as well as pursuant to the different national laws of the countries in which the group has a presence.

Compliance is obligatory for **CUPA GROUP** employees, directors, governing organs and collaborators whatever their location, hierarchical position in the organizational chart or the type of contractual relationship uniting them to the company, as well as for the different forms of administrative organs that manage the company and the members of those organs.

For these reasons, **CUPA GROUP** approves this policy which completes the principles already acquired in the **CUPA GROUP** Code of Ethics and which establishes the following commitments:

- **CUPA GROUP** undertakes to establish the opportune measures for the correct **identification** and subsequent **classification** of **personal data** managed by anyone related to the company.
- Special care and special protection measures will always be taken with data which the regulations classify as **special category data**.
- Persons in **CUPA GROUP** acquire a **confidentiality** commitment and a promise to **not transfer data to third parties**, especially the personal data they have to deal with as part of their work.
- **CUPA GROUP** shall ensure with "**disclaimer**" type messages in all its communications that third parties are correctly notified of the processing of their personal data.
- The data **CUPA GROUP** handles will be **destroyed** effectively in both digital and physical formats.
- Anyone may exercise their **ARCO rights** against the controller and **CUPA GROUP** itself shall publicize these rights in its communications.
- The **necessary technical measures** will be adopted to guarantee compliance with these principles in the digital sphere.



**Javier Fernández**  
CEO Cupa Group  
08<sup>th</sup> May 2025