PRIVACY POLICY FOR CONTACT PERSONS OF SUPPLIERS ARTS. 13 and 14

OF REGULATION (EU) 2016/679 ("GDPR")

1.CONTACT DETAILS OF THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER

| DATA | W Executive España S.L. |
|------------|--------------------------------------------------|
| CONTROLLER | Registered office: Paseo de la Castellana 85 |
| | 28046 Madrid |
| | Tax Code (CIF)· B72971385 |
| | F-mail: info@wexecutive es |
| | (Hereinafter referred to as "W Fxecutive" or the |
| | "Controller") |

2. CATEGORIES OF DATA PROCESSED AND SOURCE OF DATA

2.1. As part of the relationship that links W Executive with the **Supplier**, W Executive will collect and process your personal data (hereinafter referred to as the "**Personal Data**"), in your capacity as a contact person for W Executive.

This information will include the identifying and contact data necessary for your professional traceability: name, surname, tax identification number, landline and mobile telephone numbers, and email address.

2.2. The Personal Data will have been provided by you or by the Supplier, considering your relationship with them, via mail, fax, email, hand delivery at their premises, or through the Registration Form made available to the data subject and included in our database.

3. PURPOSE AND LEGAL BASIS FOR PROCESSING

The above-mentioned Personal Data will be processed by W Executive: in the event that the Policy is provided electronically, the check box included here must be included. for the following purposes and on the following legal basis:

- (i) <u>Management, development, and maintenance of the commercial, contractual, institutional, or any other kind of relationship established with the Supplier you represent or to whom you provide services.</u> The legal basis for this processing is the legitimate interest of W Executive in managing, developing, and maintaining the relationship established with the Supplier.
- (ii) <u>Internal administrative management of W Executive</u>, including the creation and management of a database of contact persons for suppliers and customers (CRM), which includes the

Supplier's data along with your contact details, to maintain future business relationships with the Supplier. In this way, W Executive can contact the Supplier using your personal data if a service is required that could be contracted with the Supplier.

This processing is based on the legitimate interest of W Executive in properly managing the development of its business activities. To this end, W Executive has conducted a detailed assessment of the balance between these legitimate interests and the adequate protection of your rights and interests, adopting the necessary measures to guarantee them. The result of this assessment can be requested by the employee upon request sent to the following e-mail address: privacy@wexecutive.es.

You may object to this processing at any time, as indicated in the section on the rights of the data subject.

(iii) <u>Handling complaints through the W Executive complaints channel</u>: although W Executive, given its size, is not obliged to establish an internal complaints channel according to Law 2/2023 of 20 February, it has decided, as a compliance measure, to establish the above-mentioned channel to ensure transparency in the management of its activities. As such, your personal data may be processed either as an informant or as a person referred to in the complaint made through this channel.

This processing is based, according to the aforementioned Law, on the fulfilment by W Executive of a task carried out in the public interest, adopting all measures and guarantees, particularly the protection of the informant, established in the legal system.

(iv) <u>Counsel and defence of the rights and interests of W Executive</u> before judicial and administrative bodies. This processing is based on the legitimate interest of W Executive in ensuring the company's right to effective judicial protection.

W Executive has conducted a detailed assessment of the balance between these legitimate interests and the adequate protection of your rights and interests, adopting the necessary measures to guarantee them. The result of this assessment can be consulted upon request sent to the email address privacy@wexecutive.es.

(v) <u>Communication of your data to other group entities to offer you services provided by them.</u> This communication and the related actions by the Group companies will only take place if you give us your consent by ticking the box at the end of this form. The entities that make up the Group can be found at the following link [W Group (w-group.it)].

You may revoke the consent given at any time, as indicated in the section on rights of the data subject.

4. RETENTION

Personal Data will be retained as long as the commercial, contractual, or any other kind of relationship established with the entity you represent is maintained.

Similarly, if you have not objected to the processing of your data for internal management by W Executive, your data will be retained until you exercise your right to object to the processing of your data for the abovementioned purpose.

If you have given your consent for your data to be communicated to other entities within the Group, W Executive will continue to process your personal data until you revoke your consent.

Once these retention periods have elapsed, your data will be retained, properly blocked, for the duration of the limitation periods for the legal obligations of W Executive and for any potential liabilities arising from the processing of said data.

5. RECIPIENTS

- 5.1. Personal Data may be communicated, to fulfil obligations and improve the management of W Executive and the group to which it belongs, to the following entities:
 - (i) Public administrations in compliance with the applicable legal provisions, in particular in tax matters.
 - (ii) Public administrations that request them as part of an inspection process or an administrative procedure.
 - (iii) Judicial and administrative bodies when necessary as part of a case brought before them based on the legitimate interest of the Company in guaranteeing its right to effective judicial protection.
 - (iv) Group companies of the Controller, when you have given consent for this as indicated in section 3 of this clause.
- 5.2. Furthermore, your data may be accessed on behalf of and in the name of W Executive by service providers designated as data processors or by persons authorised to process data. In these cases, W Executive undertakes to ensure the security of your data and to sign the corresponding data processing agreement with these providers, as established in personal data protection regulations.

6. LOCATION AND TRANSFER OF DATA

- 6.1. For the processing of personal data, W Executive uses an IT infrastructure located within the European Union.
- 6.2. Personal data of the data subjects may be transferred to service providers located outside the European Economic Area, resulting in an international transfer of your data. Therefore, W Executive has adequate safeguards in place in accordance with data protection regulations, such as the signing of Standard Contractual Clauses, including the corresponding transfer impact assessment. You can obtain a copy of these safeguards from the Data Protection Officer.

7. RIGHTS OF THE DATA SUBJECT

You have the right to access your personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected or you withdraw your consent to the processing, when the data were necessary for these purposes.

In certain circumstances, you may also request the limitation of the processing of your data, in which case they will only be retained for the exercise or defence of claims.

Furthermore, when the processing is based on the fulfilment of a task carried out in the public interest or to satisfy the legitimate interests of the Company, and for reasons related to your particular situation, you may object to the processing of your data. The Company will stop processing the data, except in those cases in which it is necessary to continue with the processing for legitimate reasons, or for the exercise or defence of possible claims.

You may exercise these rights by sending a written request to W Executive at the postal address indicated above, or to the e-mail address <u>privacy@wexecutive.es</u>.

You also have the right to lodge a complaint with the Spanish Data Protection Agency via its website <u>www.aepd.es</u>.

DECLARATION THAT YOU HAVE READ THE INFORMATION

I declare that I have received and read the information regarding the processing of my

Personal Data. In_____, on / /____

Legible First Name and Surname _____

Signature _____

[ONLINE]

 \square I declare that I have received and read the information regarding the processing of my Personal Data.