



kovecta

Privacy and confidentiality policy

Corporate Policies 2025

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01 Purpose

The objective of this Privacy and Confidentiality Policy (hereinafter, the “Policy”), which forms part of the Compliance Framework Policy, is to establish and disseminate the basic and general rules of Konecta, a multinational group of companies specialising in the provision of digital customer management services and solutions (hereinafter, Konecta, the Company or the Firm), related to the preventive and proactive responsibility of the principle of security and accountability, to guarantee privacy and the fundamental right to the protection of personal data for which Konecta is responsible, as well as those it accesses in its capacity as data processor during the provision of services to its customers, ensuring, in all cases, scrupulous compliance with applicable legislation.

As a signatory to the United Nations Global Compact, which it joined in 2004, Konecta is committed to Principles 1 and 2, which focus on respect and non-violation of human rights, considering privacy and data protection to be a fundamental human right in the digital age. Likewise, in order to contribute to the agenda set by the United Nations for sustainable development, the company has adopted the Sustainable Development Goals within the framework of the 2030 Agenda.



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Scope of application

Consequently, its content is mandatory for all Konecta employees, regardless of their position or role within the organisation or their geographical location.

Notwithstanding the foregoing, its scope of application may be extended, when necessary and possible due to the nature of the relationship, to all individuals and/or legal entities linked to Konecta on a business or professional basis, through a relationship other than employment: suppliers, contractors and workers in the supply chain, and business partners.

Given that many of Konecta's companies have their registered office outside the European Union, internal regulations will be adapted to the regulations of each State where necessary, respecting and ensuring compliance with the basic principles set out herein.



03

General principles of action

Konecta values and respects both its own and its clients' trade secrets, as well as industrial and intellectual property rights. For this reason, confidentiality is a tool for managing its business competitiveness and encompasses the protection of information ranging from business data relating to clients and suppliers to commercial plans and market studies or strategies, among others.

Aware that each of the countries in which the company operates has a different social context and different needs, this Privacy and Confidentiality Policy is articulated through plans and actions related to the principles set out therein, adapted to the reality of each of its local operations.

Based on Konecta's utmost respect for the applicable legislation on personal data protection, the general principles of action in relation to data processing are as follows:

- Lawfulness, fairness and transparency: personal data will be processed lawfully, fairly and transparently, so that the data subject is aware of how their data will be processed, if applicable.
- Purpose limitation: personal data shall be collected for specific, explicit and legitimate purposes and shall not be further processed in a manner incompatible with those purposes.
- Data minimisation: personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are used.
- Accuracy: personal data shall be accurate and, where necessary, kept up to date. Every reasonable measure shall be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Storage limitation: personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Integrity and confidentiality: personal data shall be processed in such a manner as to ensure appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. All this shall be in accordance with applicable legislation and the provisions of mandatory internal regulations on information security.
- Information: the processing of personal data shall be transparent in relation to the data subject, providing them with information about the processing of their data in an understandable and accessible form, when required by applicable law. In order to ensure fair and transparent processing, the Company shall inform the data subjects or interested parties whose data is to be collected of the circumstances relating to the processing in accordance with the applicable regulations.
- Accountability: Konecta shall be responsible for complying with the principles set out in this Policy and in the applicable regulations on personal data protection and privacy, and shall be able to demonstrate this when required by these regulations.
- International data transfers: any processing of personal data subject to European Union regulations that involves a transfer of data outside the European Economic Area must be carried out in strict compliance with the requirements established in the applicable law in the jurisdiction of origin.

- Risk-based approach: when an activity involves the processing of personal data that may pose a high risk to the rights and freedoms of the data subject, to the extent and in the manner required by the regulations, Konecta will carry out a risk and impact assessment on the protection of personal data and privacy before the processing begins.
- Rights of data subjects: the company will allow data subjects to exercise their rights of access, rectification, erasure, restriction of processing, portability and objection as applicable in each jurisdiction, establishing, for this purpose, the internal procedures necessary to satisfy, at least, the legal requirements applicable in each case.

Konecta will always inform data subjects in clear and simple language about how their data is processed, emphasising that all personal data is kept confidential and with adequate security, taking into account the characteristics of the data.

Of particular relevance is the role that Konecta adopts when providing services to its clients: data processor.

These principles of action respond to the impacts, risks and opportunities (IROs) arising from the applicable material issues: compliance and corporate ethics, supplier management, communication and transparency with stakeholders.

Both employees and any third parties who suspect the existence of any potential breach related to this Policy may submit their information, questions or concerns on this matter, confidentially and without fear of reprisals, through the Information Channels available on Konecta's corporate website (<https://Konecta.integrityline.com>), depending on the nature of the situation, in accordance with procedure PG COR 26 Information Channels, available on the same website, which specifies the different channels available and the nature of the communication that can be made through them.

This channel is available 24 hours a day, 7 days a week. No reprisals will be tolerated against anyone who, in good faith, reports facts that could constitute a breach of this policy, and the guarantees and protections established by the applicable regulations and legislation will apply to those who report.

Failure to comply with this policy will be subject to the corresponding disciplinary measures in accordance with internal rules and procedures, without prejudice to any administrative or criminal penalties that may also result from this and which may be imposed by the competent authority.

04

Updating and revision

The Privacy and Confidentiality Policy will be reviewed periodically or when necessary to bring it into line with changes in the business model, the approval of new regulations or international best practices, ensuring its effectiveness and ongoing compliance.

NOTE: This Policy has been approved on December 16, 2025, by the highest governing body and replaces any previous version of it, with only this document being valid from this date onwards.

Version Control

Version	Review date	Reviewed	Validated	Approved	Reason for change
2	06/22/2021	Compliance Organization & Procedure	Legal Affairs	Board of Directors	General Policy Review
3	12/19/2022	Compliance Organization & Procedure	Legal Affairs	Board of Directors	General Policy Review
4	12/16/2025	Compliance Organization & Procedure	Legal Affairs	Board of Directors	Alignment with legal requirements Alignment with the new format and branding