

**OnMobile Global Spain S. L. U
DATA PROTECTION POLICY**

Document Release Date: 2024

Document Version: 1.0

Document classification: External / Important

Document Control:

Document Status	Final
Document Classification	External / Important
Document Owner	A.V.P. – Information Technology
Effective Date	26.12.2024
Version	1.0

Approval and authorization:

Name	Designation & Department	Date
Manu Sharma	A.V.P. – Information Technology	26.12.2024
Rajinder Sharma	General Counsel	26.12.2024

Introduction

OnMobile Global Spain S. L. U , with its registered office at Avenida de Europa 24, Edificio A, 1ºC, 28108, Alcobendas, Madrid (Spain), is committed to protecting the privacy and confidentiality of personal data collected and processed as part of its business operations. This policy outlines our responsibilities, procedures, and practices to ensure compliance with the General Data Protection Regulation (GDPR) in Europe and Spanish Data Protection Act (Ley Orgánica de Protección de Datos) (Organic Law 3/2018) as applicable in Spain.

Scope

This policy applies to all employees, contractors, and third-party service providers who process personal data on behalf of OnMobile Global Spain S. L. U It covers all personal data processed in electronic and manual formats.

Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Processing:** Any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, alignment, combination, restriction, erasure, or destruction
- **Data Subject:** An individual whose personal data is processed.

Principles

OnMobile Global Spain S. L. U is committed to upholding the following data protection principles:

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

Data Collection and Processing

Personal data are collected for specified, explicit, and legitimate purposes. We ensure that the data collected is adequate, relevant, and limited to what is necessary for the intended purposes as mentioned in the Privacy Notice displayed on our website. Before collecting personal data, we provide individuals with transparent information regarding the purposes and legal basis for processing.

Lawful Basis for Processing

We only process personal data when we have a lawful basis, including:

- Consent
- Contractual necessity
- Legal obligation
- Vital interests
- Legitimate interests

Data Subject Rights

We recognize and respect the following rights of data subjects under the GDPR:

- **Access:** The right to access personal data.
- **Rectification:** The right to correct inaccurate data.
- **Erasure:** The right to request deletion of data.
- **Restriction of Processing:** The right to restrict processing under certain conditions.
- **Data Portability:** The right to receive data in a structured, commonly used, and machine-readable format.
- **Objection:** The right to object to processing

Data Security

OnMobile Global Spain S. L. U has implemented appropriate technical and organizational measures to ensure the security and confidentiality of personal data. Access to personal data is restricted to authorized personnel on a need-to-know basis. Regular security assessments, including vulnerability testing and risk assessments, are conducted to identify and mitigate potential risks.

Data Breach Response

In the event of a personal data breach, we promptly assess the impact and take appropriate actions to mitigate harm and prevent future incidents. Breaches are reported to the Spanish Data Protection Authority (Agencia Española de Protección de Datos, "**AEPD**") and affected individuals, where required by law within 72 hours.

Data Transfer

Personal data transfers to third parties, including international transfers, shall only occur if appropriate safeguards are in place. Transfer mechanisms, such as standard contractual clauses, shall be used to ensure adequate data protection.

Data Retention

Personal data shall be retained for no longer than necessary to fulfil the purposes for which it was collected unless required by legal or regulatory obligations. A data retention schedule is established and periodically reviewed to ensure compliance.

Training and Awareness

OnMobile Global Spain S. L. U provides regular training and awareness programs to employees and contractors to ensure understanding and compliance with data protection policies and procedures.

Compliance Monitoring and Review

Compliance with this policy is monitored and reviewed regularly to identify areas for improvement and ensure ongoing adherence to data protection requirements. This policy is reviewed at least annually or whenever significant changes to relevant legislation or business processes occur.

Data Protection Officer

The Data Protection Officer (DPO) is responsible for overseeing the implementation of this policy, monitoring compliance, and providing guidance and support on data protection matters. Employees and contractors report any potential data protection issues or breaches to the DPO, who will investigate and take appropriate action.

Privacy Notices

Privacy notices are provided to individuals when collecting their personal data, outlining the purposes, legal basis, retention periods, and their rights in relation to their data.

Third-Party Data Processors

When engaging third-party data processors, OnMobile Global Spain S. L. U ensures that appropriate contracts and agreements are in place to safeguard personal data. Third-party processors are selected based on their ability to provide sufficient guarantees regarding the security and protection of personal data.

Data Protection Impact Assessments (DPIAs)

DPIAs are conducted for high-risk processing activities, such as those involving large-scale data processing or the use of new technologies. The DPIA process assesses the impact on data subjects' rights and freedoms and identifies measures to mitigate potential risks.

International Data Transfers

When transferring personal data to countries outside the European Economic Area (EEA), OnMobile Global Spain S. L. U ensures that appropriate safeguards are in place, as required by the GDPR. Such safeguards may include adequacy decisions, the use of standard contractual clauses, binding corporate rules, or obtaining explicit consent from the data subject.

Record Keeping

OnMobile Global Spain S. L. U maintains records of its data processing activities, including the purposes, categories of data subjects and personal data, recipients, retention periods, and any international transfers. These records are reviewed regularly and updated as necessary.

Review and Amendment

This policy is periodically reviewed to ensure its effectiveness and compliance with evolving data protection regulations. Amendments to this policy are approved by the appropriate management authority and communicated to all employees and relevant stakeholders.



By adhering to this Data Protection Policy, OnMobile Global Spain S. L. U demonstrates its commitment to protecting personal data and upholding the principles and requirements of the Spanish Data Protection Law and GDPR.