

MACOGA, SA Privacy and Confidentiality Policy

Privacy and Confidentiality Policy

The present document is **for information purposes only** and shows in brief the requirements under which, each of the members of MACOGA, S.A., must treat the information in the scope of the organisation, protecting this information, as well as avoiding its unauthorised disclosure to third parties that could put at risk the fulfilment of the objectives of the company.

We have designed our privacy policy to explain how we treat confidential information. It is inevitable that employees will receive and handle personal and private information about customers, partners and our business. We want to ensure that this information is well protected.

We must protect this information for two main reasons: it is legally binding (e.g. sensitive customer data) and it forms the backbone of our business (e.g. business processes, production processes, business management, etc.).

MACOGA, S.A. is deeply committed to complying with Spanish personal data protection regulations and therefore strictly complies with the guidelines of the Organic Law on Personal Data Protection, with the Royal Decree approving the Regulations for the development of the Organic Law and with all regulations in force at any given time. MACOGA, S.A. guarantees the correct use and treatment of the user's personal data. For further information in this regard, please contact macoga@macoga.com

It will be considered confidential information:

- The internal information explicitly declared as confidential and that of third parties delivered to MACOGA, S.A. under a confidentiality agreement.
- Data of workers, suppliers and other third parties related to MACOGA, S.A. that have not been publicly disclosed by MACOGA, S.A. or by the owners of the data.
- Documentation related to the activities of the different areas of MACOGA, S.A. that have not been publicly disclosed by them.
- Unpublished financial information.
- Customer/partner/vendor data.
- Patents, formulas, new technologies, information on production processes, management processes, etc.
- Lists of customers and suppliers (existing and potential).
- Data entrusted to our company by external parties.
- Prices/marketing strategies and other undisclosed strategies.
- Documents and processes explicitly marked as confidential.
- Unpublished objectives, forecasts and initiatives marked as confidential.

Confidential and proprietary information is secret, valuable, costly and/or easily replicable.

Scope

This policy applies to all employees and staff, including board members, investors, contractors and volunteers, who may have access to confidential information.

This Policy shall cover all activities, processes and relationships established by MACOGA, S.A. and its employees, at all levels, whether formally set out in contract, policy, procedure or similar, or applied by custom or practice.

Obligation of discretion, secrecy and confidentiality

The distribution of confidential information, whether intentional or accidental, can cause serious damage to MACOGA, S.A., its employees and third parties. Therefore, in order to ensure that the information is used with the necessary degree of secrecy and confidentiality, the following guidelines are established:

- All workers must comply with the duty of discretion, secrecy and confidentiality in relation to the Confidential Information available to them for the exercise of the tasks inherent to their job or those corresponding to their participation in the different committees or groups existing in MACOGA, S.A.
- The information shall be used for legitimate purposes and in an honest and responsible manner and shall comply with the provisions of the Organic Law on Data Protection and other regulations that ensure the confidentiality of the information.
- The duty of confidentiality must be complied with, in accordance with the provisions of the contracts signed with the different customers, suppliers and other third parties linked to MACOGA, S.A.

- No employee shall, either during the term of their corporate/employment relationship or once it has ended, disclose confidential information without due authorisation from MACOGA, S.A.

The hierarchical superior must be informed immediately of:

- Any use, dissemination and/or publication of confidential information by other workers.
- Any attempt by a third party outside MACOGA, S.A. to obtain confidential information from any employee.

What MACOGA, S.A. personnel must do:

- Block or secure confidential information at all times.
- Ensure that they only view confidential information on secure devices.
- Only disclose information to other employees when necessary and authorised.
- Keep confidential documents within our company premises unless it is absolutely necessary to move them.

What MACOGA, S.A. personnel must not do:

- Use confidential information for any personal gain or profit.
- Disclose confidential information to anyone outside our company.
- Replicate confidential documents and files and store them on insecure devices.

When employees leave our company, they are required to return confidential files and delete them from their personal devices.

Mechanisms in place to ensure confidentiality

Signing of a confidentiality commitment, when an employee joins MACOGA, S.A. The document will inform about the duty of secrecy and confidentiality, what type of information is confidential, etc. The signature is obligatory and implies the acceptance of the obligation it represents on the part of the worker.

Incorporation of a confidentiality clause in the contracts signed by MACOGA, S.A.

Signing of a confidentiality document by contractors, subcontractors, consultants, and other individuals or external entities, who have access to private and confidential information of the company, in the development of their work.

Restricted access to information available on the internal computer network.

Requesting authorisation from senior management for employees to access certain confidential information.

Distribution of information

The distribution of confidential information not previously made public by the relevant managers of MACOGA, S.A. must have the authorisation of the Management.

The distribution of printed or digital material produced by MACOGA, S.A. for any purpose, the photographic images or filming of any kind in the facilities, as well as any other action involving the advertising of materials owned by MACOGA, S.A. or with its name, must have the authorisation of the Management.

Breach of the Policy

Failure to comply with our Privacy Policy may result in MACOGA, S.A. taking disciplinary and, possibly, legal action.

Any incident or query related to this policy should be communicated directly to any of the members of MACOGA, S.A.'s Management through the following e-mail address: macoga@macoga.com

WARNING: The English version is a translation of the original in Spanish issued for information purposes only. In the event of a discrepancy between the content of the English version and the original Spanish version the latter shall prevail.