



# DATA PROTECTION POLICY

**SUMMARY AND CHANGE CONTROL FORM**

<b>TITLE</b>	<b>DATA PROTECTION POLICY</b>	
<b>DESCRIPTION</b>	The purpose of this Policy is to establish the basic and common elements of Valoriza regarding data protection.	
<b>SCOPE</b>	<p>All entities belonging to Valoriza, taking into account their own characteristics, including subsidiaries or majority-owned companies in which Valoriza exercises effective control.</p> <p>Members of the administrative bodies, executives and employees of all Valoriza entities listed above.</p> <p>Those third parties, individuals and/or legal entities, related to Valoriza, in those aspects of this Policy that are applicable to them.</p>	
<b>DEPARTMENTS AFFECTED</b>	All	
<b>AUTHOR</b>	Internal Audit, Compliance and Data Protection Department	
<b>RESPONSIBLE</b>	<b>RESPONSIBLE</b>	<b>FUNCTIONS</b>
	Internal Audit, Compliance and Data Protection Department	Distribution and monitoring of policy implementation.
	Other departments	Ensure compliance with the principles set out in this policy.
<b>APPROVED BY</b>	Board of Directors	

VERSION	DATE	RESPONSIBLE FOR CHANGES	DESCRIPTION OF CHANGES	APPROVED BY
V0	10/12/25	Internal Audit, Compliance and Data Protection Division	Initial draft	Board of Directors

## CONTENTS

<b>1</b>	<b>Scope of application</b>	<b>6</b>
<b>2</b>	<b>Principles</b>	<b>7</b>
	<b>Principle of "lawfulness, fairness and transparency".</b>	<b>7</b>
	<b>Principle of "purpose limitation".</b>	<b>8</b>
	<b>Data minimization" principle</b>	<b>8</b>
	<b>Accuracy" principle</b>	<b>8</b>
	<b>Principle of "limitation of the storage period".</b>	<b>8</b>
	<b>Principle of "integrity and confidentiality".</b>	<b>8</b>
<b>3</b>	<b>Proactive responsibility</b>	<b>8</b>
	<b>Risk assessment or analysis</b>	<b>9</b>
	<b>Impact assessment</b>	<b>9</b>
	<b>Recording of processing activities</b>	<b>9</b>
	<b>Security breaches</b>	<b>9</b>
	<b>Privacy Governance Model.</b>	<b>10</b>
<b>4</b>	<b>Data subjects' rights</b>	<b>10</b>
<b>5</b>	<b>Data Processors</b>	<b>10</b>
<b>6</b>	<b>International data transfers</b>	<b>11</b>
<b>7</b>	<b>VALORIZA GROUP commitments</b>	<b>11</b>
<b>8</b>	<b>Control and evaluation of compliance with the Policy. Action in case of non-compliance.</b>	<b>12</b>
<b>9</b>	<b>Approval and entry into force</b>	<b>13</b>

## DATA PROTECTION POLICY

The Board of Directors of VALORIZA SERVICIOS MEDIOAMBIENTALES, S.A. (hereinafter, "**Valoriza**"), within the framework of its general and non-delegable competence to determine the general policies and strategies of the VALORIZA Group and after review and proposal by the Audit Committee, has approved this Personal Data Protection Policy (hereinafter, the "**Policy**").

This Policy is part of the "Model of Regulatory Compliance, Criminal Prevention, Anti-bribery and Antitrust of VALORIZA Group" (hereinafter, "**Model of Regulatory Compliance**"). The VALORIZA Group Code of Ethics" is the internal rule that forms the basis of this Compliance Model. This Policy is aligned with the values of integrity (honesty and transparency) promulgated in the Code of Ethics and constitutes a development of one of its guidelines of behavior with the Market: the one related to personal data protection. Consequently, this Policy must be read and interpreted in conjunction with this Code of Ethics and the other VALORIZA Group policies that develop it and should serve as a guide to the professionals of the Organization, in relation to the protection of personal data in accordance with current legislation.

The protection of individuals in relation to the processing of their personal data is a fundamental right established in Article 8.1 of the Charter of Fundamental Rights of the European Union and Article 16.1 of the Treaty on the Functioning of the European Union, as well as transferred in Article 18.4 of the Spanish Constitution which states that *"the law shall limit the use of information technology to ensure the honor and personal and family privacy of citizens and the full exercise of their rights"*.

### **1 Purpose**

The objectives of this Policy are as follows:

- To make the Organization's professionals aware of the applicable regulations on data protection and, in particular, REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter, GDPR) and the ORGANIC LAW 3/2018 of December 5, 2018, ON THE PROTECTION OF PERSONAL DATA AND GUARANTEE OF DIGITAL RIGHTS (hereinafter, LOPDGDDD).

- Enact and strengthen the commitment of VALORIZA Group with respect for the fundamental rights and freedoms of individuals, among which is the right to the protection of personal data.
- Establish the fundamental principles and obligations imposed by the regulations on the protection of personal data to companies and individuals that make up the VALORIZA Group.
- Set the guidelines to be followed in the Group to ensure the privacy of data of customers, suppliers, employees and, in general, of all categories of data involved, identifying the most appropriate basis of legitimacy for the processing of personal data carried out in accordance with current legislation.

The rules of action contained in this Policy shall apply in the context of the work carried out by the Organization's professionals and shall be aimed at protecting the personal data of both professionals and all third parties (suppliers, customers, representatives of public administrations, etc.) who have dealings with the Organization.

The rules contained in this Policy are mandatory guidelines for all the Organization's professionals, who shall also use their best efforts to ensure that they are respected, both by other professionals and by the Organization's subcontractors involved in activities involving the processing of personal data.

The rules contained in this Policy shall be supplemented by the provisions of the DATA PROTECTION AND INFORMATION SECURITY USER MANUAL for the Organization's personnel.

## **2 Scope of Application**

In this Policy, when mentioning "Valoriza" or "the Company", it is understood that the entities established in this Scope of Application are included within its scope of application.

This Policy applies to:

- All entities belonging to Valoriza, taking into account their own characteristics. For the purposes of this document, the Valoriza Group is considered to be made up of all subsidiaries or majority-owned companies in which, directly or indirectly, including Temporary Joint Ventures (UTE), Valoriza exercises effective control, regardless of their geographical location.
- The scope of application does not include subsidiaries or companies in which Valoriza Servicios Medioambientales, S.A. does not exercise effective control, either directly or indirectly, and which, if applicable, will have their own policies or internal regulations

governing the matter, and in no case may these be contrary to the provisions of this Policy.

- The members of the administrative bodies, as well as all VALORIZA professionals, regardless of their hierarchical position within the Organizations or their professional qualifications or the type of their relationship with the Organization, regardless of the territory in which they are located.
- Those third parties, natural and/or legal persons, related to Valoriza, in those aspects of this Policy that are applicable to them and from whom behavior in accordance with the same is expected.

In the case of activities carried out by Valoriza outside Spain, this Policy must be adapted to the most restrictive local legislation that may be applicable.

As regards the material scope of application, this Policy applies to the total or partial automated or non-automated processing of personal data in the context of the activities carried out by the Organizations described.

### **3 Principles**

Chapter II of the GDPR sets out the principles governing data protection and which therefore form the basis of this Policy:

#### **Principle of "lawfulness, fairness and transparency".**

VALORIZA will treat personal data in a lawful, fair and transparent manner, that is, the data subject will be informed about the processing of their data and the specific purposes, offering all the additional information that may be necessary.

Natural persons shall be informed that personal data concerning them are being collected, used, consulted or otherwise processed, as well as the extent to which such data are or will be processed.

Personal data shall be processed in a manner that ensures appropriate security and confidentiality, including to prevent unauthorized access to or use of such data and the equipment used in the processing.

No personal data will be processed without the consent of the data subject or in accordance with the general rules of applicable law.

VALORIZA will not collect or process personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic data, biometric data aimed at uniquely identifying a natural person, data concerning

health or data concerning the sex life or sexual orientation of a natural person, unless such collection and subsequent processing are necessary, legitimate or mandatory or permitted by applicable law, in which case they shall be collected and processed in accordance with the provisions of such law.

**Principle of "purpose limitation".**

Personal data processed by VALORIZA will always be collected for specified, explicit and legitimate purposes and will not be further processed in a manner incompatible with them; unless they are processed in the future for archiving purposes in the public interest, scientific and historical research purposes or statistical purposes will not be considered incompatible with the initial purposes.

**Principle of "data minimization".**

VALORIZA will process only those personal data that are strictly necessary for the purpose for which they were collected, that is, they will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

**Principle of "accuracy".**

VALORIZA will ensure that the personal data processed are accurate and up to date, adopting for this purpose those reasonable measures to ensure that they are deleted or rectified when it is detected that they are inaccurate with respect to the purposes for which they were collected.

**Principle of "limitation of the retention period".**

The Organization shall not retain the personal data it processes beyond the time necessary for the purposes for which they were collected, unless required by law or if they are retained for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

**Principle of "integrity and confidentiality"**

The Organization shall endeavor to ensure the integrity and confidentiality of the personal data processed, by implementing technical or organizational measures to protect them from unauthorized or unlawful processing, against accidental loss, destruction or damage.

**4 Proactive responsibility**

VALORIZA is committed to compliance with the principles listed above by applying due diligence and must be able to demonstrate such compliance by applying a "proactive responsibility" which translates into:

### **Risk assessment or analysis**

VALORIZA is obliged to implement timely and effective measures and must be able to demonstrate the compliance of processing activities with applicable law, including the effectiveness of the measures. Such measures must take into account the nature, scope, context and purposes of the processing, as well as the risk to the rights and freedoms of natural persons. To this end, the Organization shall carry out a risk assessment or analysis of the processing operations it carries out, in order to assess on the basis of an objective evaluation whether the data processing operations involve a risk and whether this risk is high, thus determining that the measures implemented are in compliance with the legal obligations.

### **Impact assessment**

VALORIZA will perform impact assessments in those cases provided for in the applicable legislation, that is, when there is a likelihood that a particular treatment and, in particular if new technologies are used, involves a high risk to the rights and freedoms of individuals. The likelihood that the type of processing is likely to involve risks shall be assessed on the basis of the following criteria: its nature, its scope and the context or purposes of the type of processing. The impact assessment shall include, in particular, the measures, safeguards and mechanisms in place to mitigate the risk, to ensure the protection of personal data and to demonstrate compliance with applicable law.

For this purpose, the guidelines and instructions set out in the corresponding internal procedure shall be followed.

### **Registration of processing activities**

VALORIZA, both when acting as controller and when acting as processor of some of its customers, will keep records of processing activities under its responsibility.

### **Security breaches**

In the event of an incident in the processing of personal data for which VALORIZA is responsible and that may involve physical, material or immaterial damage or harm to natural persons, such as loss of control over their personal data or restriction of their rights, discrimination, identity theft, financial losses, unauthorized reversion of pseudonymization, damage to reputation, loss of confidentiality of data subject to professional secrecy or any other significant economic or social damage to the natural person who is the owner of the personal data, the internal guidelines and rules established in the Organization for the management of the so-called Security Breaches or Breaches will be followed.

### **Privacy Governance Model.**

The Group's organizational structure for the protection of personal data is made up of the following bodies and people in charge:

- a) Internal Audit, Compliance and Data Protection Management and the Data Protection Officer ("DPO") of the VALORIZA Group: figures who jointly exercise, among others, the function of supervising compliance with regulations, informing and advising the Group on data protection matters, in addition to serving as a point of contact with the competent Control Authority. The communication channels enabled are: [protecciondedatos@valorizasm.com](mailto:protecciondedatos@valorizasm.com) and [dpo@valorizasm.com](mailto:dpo@valorizasm.com)
- b) VALORIZA Group Cybersecurity Committee: committee composed of staff from the Information and Communication Technologies ("ICT") Department and the Internal Audit, Compliance and Data Protection Department, whose task is to address the Group's privacy and security issues from an integrated perspective.

### **5 Rights of data subjects**

VALORIZA undertakes to facilitate the data subject the exercise of their rights recognized by applicable law:

- Right of access;
- Right of rectification;
- Right of deletion (right to be forgotten);
- Right to limitation of processing;
- Right to data portability;
- Right of opposition and the right not to be subject to automated individual decisions.

For this purpose, the guidelines and rules established in the internal procedures governing the exercise of data subjects' rights will be followed.

### **6 Data processors**

VALORIZA has internal contracting procedures that regulate and establish the specific measures to be taken with respect to the procurement of services from suppliers who access data occupying the figure of data processors, as well as those suppliers who, without being data processors, could access accidentally or accessory to personal data under the responsibility of the Organization. The provision of these services shall be regulated in the

corresponding data processing contracts or by including ad hoc clauses in the main service contract.

## **7 International data transfers**

VALORIZA maintains international relations with third countries in their lines of activity, so it will often be necessary to make international transfers of data, even to States that do not offer the same security as the Member States of the European Union or those recognized by the Commission as a safe destination. Therefore, VALORIZA will ensure that any treatment that involves a transfer of data outside the Union or to countries that do not have an adequate level of data protection, is carried out in compliance with the requirements of applicable law.

## **8 VALORIZA GROUP commitments**

Following the principles and standards included in this Policy, the Organization develops internal procedures, or any other internal support document, which allows the implementation of the applicable legislation, thus forming a Data Protection Management System. These procedures or supporting documents will be mandatory for all VALORIZA professionals.

As reflected in the general principles of VALORIZA expressed in its Code of Ethics, respect for legality, integrity, honesty, transparency and fundamental rights of individuals, are basic ethical principles that must govern any action of its members who are committed to maintain at all times a behavior in accordance with current regulations that may be applicable and, in particular, to that relating to personal data protection.

VALORIZA by express will of the Board of Directors of VALORIZA Servicios Medioambientales, S.A., which formalizes it in this Policy, expressly states its position of absolute respect for the privacy and integrity of individuals and its rejection of the violation of the principles relating to the protection of personal data included in the previous section, assuming the following commitments and obligations in the processing of personal data necessary to carry out its activity:

- a) Comply with the legal requirements, regulations or those derived from international agreements that may be applicable, and align with internationally recognized standards and good practices in this area.
- b) Ensure that neither VALORIZA Group companies or their employees collect, process, store, retain, communicate or use personal data in a manner that contravenes these rules, respecting the legitimate rights of the owners of these data.

- c) Respect the right to privacy of individuals, protecting the personal data entrusted in particular by: - its employees, processing under the legally established terms, their personal data and in particular, medical or economic data. - third parties related to the Group such as customers, suppliers, partners or institutions and the general public.
- d) Establish protocols that evidence the application of privacy by design and by default.
- e) Design mechanisms for supervision and continuous improvement, based on auditing and control of the correct fulfillment of data protection obligations.

### **9 Control and evaluation of compliance with the Policy. Action in the event of non-compliance.**

The Data Protection Management System shall be controlled and evaluated periodically. To this end, under the direction and supervision of the Internal Audit, Compliance and Data Protection Department, a periodic audit of compliance with the provisions of this Policy and applicable legislation in general will be carried out.

On the other hand, Internal Audit, within the framework of its annual planning for the review of all the Organization's systems, will include a specific section on data protection in order to control compliance with the applicable regulations in the subsidiaries and delegations it visits. The results obtained from the different audits and other controls will be reported to the governing body.

Violations of this Policy will be subject to the application of the disciplinary regime that Valoriza applies in accordance with the corporate governance system, collective bargaining agreements and current legislation. Anyone who detects a possible breach of this Policy must report it as soon as possible to the Regulatory Compliance Unit through the Ethics Channel enabled as a preferred channel by Valoriza, without prejudice to other means of communication with the Regulatory Compliance Unit permitted by law. Through this same Channel, the Regulatory Compliance Unit will also resolve any possible doubts or queries regarding the same.

The Ethics Channel is available through the following channels:

- Intranet: Through the links provided for this purpose.
- Group's external website: Through access to the Channel included in the website: [www.valorizasm.com](http://www.valorizasm.com).

## **10 Approval and entry into force**

This Data Protection Policy was approved by the Board of Directors of VALORIZA SERVICIOS MEDIOAMBIENTALES, S.A. on 10 of December of 2025, this being its first version in force.

With its entry into force, this Policy repeals any other internal regulations on the subject that may have existed until now. This document will be properly disseminated through the usual channels of communication of VALORIZA Group and will be updated periodically in accordance with regulatory changes, or structural modifications of the Group or by introducing improvements arising in the revisions of the Corporate Governance system or the Data Protection Management System. The latest version can be found at [www.valorizasm.com](http://www.valorizasm.com).

In case of discrepancy between the translation of this procedure into other languages and its original Spanish version, the latter shall prevail.