PRIVACY POLICY

Who is the controller responsible for processing your data?

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), and with the rest of applicable legislation on the matter, we inform you that the personal data you provide will be processed by Satlink S.L., with NIF B-80414634, and registered office at Carretera de Fuencarral, Arbea Campus Empresarial, Building 5, Ground floor, 28108, Alcobendas, Madrid.

For what purpose and on what legal basis do we process your data?

Your personal data may be processed for the following purposes:

- <u>Contact</u>: The purpose of the processing is the management of and response to the requests you make. This processing is legitimized based on the express consent you give when sending your request (art. 6.1 a) GDPR).
- Commercial communications: Satlink S.L. occasionally sends commercial communications related to its products and services. Such communications have as their legal basis the express consent (art. 6.1 a) GDPR) in the case of data subjects who are not clients of Satlink S.L., and the legitimate interest (art. 6.1 f) GDPR) in the case of clients of Satlink S.L.
- Potential clients: Satlink S.L. may process your identification and contact data for the purpose of maintaining relationships of any kind, and to inform you about its services, at your request or with your consent. This processing is legitimized by your express consent (art. 6.1 a) GDPR) in the case of potential clients who are natural persons, and by the legitimate interest (art. 6.1 f) GDPR) that links the parties, in relation to art. 19 of Organic Law 3/2018 of 5 December on Personal Data Protection and guarantee of digital rights, in the case of representatives of potential clients that are legal entities.
- <u>Clients</u>: Satlink S.L. processes the data of its clients for the purpose of managing
 the contractual relationship that links the parties. This processing is legitimized
 based on compliance with legal obligations (art. 6.1 c) GDPR), as well as on the
 legitimate interest that links the parties (art. 6.1 f) GDPR), in relation to art. 19 of
 Organic Law 3/2018 of 5 December on Personal Data Protection and guarantee of
 digital rights.
- Suppliers and partners: Satlink S.L. processes the data of its suppliers and partners for the purpose of managing the contractual relationship that links the parties. This processing is legitimized based on the performance of a contract (art. 6.1 b) GDPR) and compliance with legal obligations (art. 6.1 c) GDPR). In the case of representatives of suppliers or partners that are legal entities, the legitimate interest (art. 6.1 f) GDPR) that links the parties will additionally apply, in relation to art. 19 of Organic Law 3/2018 of 5 December on Personal Data Protection and guarantee of digital rights.

- <u>Job candidates</u>: In the event that you have sent your résumé to enter a personnel selection process, Satlink S.L. will process the data for this sole purpose. This processing is legitimized based on the application of pre-contractual measures at your request (art. 6.1 b) GDPR). Satlink S.L. may process your résumé once the selection process has concluded for future vacancies, such processing being legitimized based on the legitimate interest of Satlink S.L. (art. 6.1 f) GDPR).
- Exercise of rights and privacy management: Satlink S.L. may process your data for the purpose of managing your requests to exercise rights in the area of data protection, or any other purpose necessary to comply with personal data protection regulations. This processing is legitimized based on compliance with a legal obligation (art. 6.1 c) GDPR).
- Ethics Channel: Satlink S.L. may process your personal data for the purpose of managing the information received through the ethics channel. This processing is legitimized based on compliance with a legal obligation (art. 6.1 c) GDPR). This processing is carried out under joint responsibility together with the other entities that make up Grupo Satlink in Spain. You can find additional information about our ethics channel here.
- Cookies: Satlink S.L. may process your data obtained through the cookies that are loaded on your device when accessing our website, for the purpose of ensuring the correct functioning and security of our website. This processing is legitimized by the legitimate interest of Satlink S.L. (art. 6.1 f) GDPR). Likewise, your data may be processed through cookies for the purpose of carrying out statistical analyses, such processing being legitimized in your express consent (art. 6.1 a) GDPR), which you give when you accept, where appropriate, the installation of analytical cookies in our cookie banner.

To whom will we disclose your personal data?

Satlink S.L. will only disclose your personal data to those third parties, bodies and public institutions of the General State Administration, of the Autonomous and Local Administrations, including the judicial bodies to which it is legally obliged to provide them.

In the case of clients and suppliers, the data may be disclosed to banking entities for the management of collections and payments arising from our contractual relationship.

On the other hand, Satlink S.L. has external providers, such as hosting services, consultancies, providers of payment services through our website, management firms and similar, who will process your data following the documented instructions of Satlink S.L., and only for the purpose for which they were collected. In this regard, Satlink S.L. has entered into the pertinent personal data processing agreements with said providers.

Does Satlink carry out international transfers of personal data?

Satlink S.L. may carry out international transfers of the data obtained through the cookies that are loaded on your device when accessing our website. In the event that you have

accepted the installation of analytical cookies, the recipient of your personal data obtained through the cookies will be Google Analytics, owned by Google LLC, an entity that is adhered to the Data Privacy Framework, guaranteeing processing of personal data with adequate safeguards.

For how long will we retain your data?

Depending on the purpose for which we process your data, the retention period may vary:

- Contact and potential clients: In the event that you contact Satlink S.L. to request information, your data will be retained for a period of two years from the last communication made by the user, such period being renewed with each new contact or relationship carried out by the user.
- Commercial communications: In the event that you are not a client of Satlink S.L.,
 your data will be processed for this purpose until you withdraw your consent or
 object to the receipt of commercial communications. If you are a client, your data
 will continue to be retained for the purpose of managing our contractual
 relationship, but commercial communications will not be sent to you from the
 moment you object to such sending.
- <u>Clients and suppliers</u>: The personal data of our clients and suppliers will be retained for the entire time the contractual relationship remains in force and, subsequently, until the statute of limitations for possible legal liabilities, duly blocked.
- <u>Job candidates</u>: The curricular data and any others that you have provided to be part of our personnel selection processes will be retained for a period of two years from their receipt. If Satlink S.L. considers that your résumé may continue to be of interest for future selection processes, before the two year period from its receipt is exceeded, it will request the candidate to update his or her résumé. In the event that the candidate does not send a response to such request, Satlink S.L. will proceed to the definitive deletion thereof.
- Exercise of rights and privacy management: In the event that you have exercised
 your rights in the area of data protection, or we need to process your data in
 compliance with legal obligations established by data protection regulations, your
 data will be retained for the time necessary to comply with our obligations and,
 subsequently, until the time of the statute of limitations for possible legal actions,
 duly blocked.
- Ethics Channel: The data processed for the purpose of managing the ethics channel will be retained during the processing of the investigation file and, subsequently, until the statute of limitations for possible legal liabilities.
- <u>Cookies</u>: The data obtained through the cookies that are loaded on your device when accessing our website will be retained for a different duration depending on each cookie installed. You can obtain information on the retention period of the cookies installed in our Cookies Policy.

What security measures will be applied to your personal data?

Satlink S.L. has implemented the necessary technical and organizational security measures to ensure a level of security appropriate to the risk, taking into account the state of the art, the costs of implementation, and the nature, scope, context and purposes of processing, as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, in compliance with art. 32 of Regulation (EU) 2016/679 General Data Protection Regulation.

How can you exercise your rights in relation to your personal data?

If you wish to revoke the consents granted, as well as exercise your rights of access, rectification, objection, erasure, restriction, portability and your right not to be subject to automated decisions, including profiling, you may do so by means of a written request to Carretera de Fuencarral, Arbea Campus Empresarial, Building 5, Ground floor, 28108, Alcobendas, Madrid, or by email to info@satlink.es. Likewise, we inform you that you have the right to file a complaint with the Spanish Data Protection Agency if you consider it appropriate here.

Satlink S.L. as data processor

For the provision of certain services, Satlink S.L. is positioned as data processor of the personal data for which its clients are responsible. The processing of personal data carried out as data processor is regulated in the commercial agreement and or the contracting conditions entered into by Satlink S.L. with its clients in each case.

User commitments

The user undertakes to inform Satlink S.L. of any modification undergone by the information provided. In order to make said communication, you may contact the email account info@satlink.es.