

Personal Data Protection Policy



INDEX

- 1. Background3**
- 2. Purpose and Scope.....3**
- 3. Definitions3**
- 4. Basic Principles4**
- 5. Strategic Lines of Action and Commitments5**
- 6. Approval7**

1. Background

In the information society in which we live, personal data plays a crucial role. Personal data protection is therefore a legal response to the phenomenon of the information society, aimed at curbing the potential threat that technological development represents for people's rights and liberties.

2. Purpose and Scope

The purpose of the Personal Data Protection Policy (the "**Policy**") is to establish the general principles and guidelines that govern the processing of personal data carried out by all companies belonging to the Cellnex Group (the "**Cellnex Group**") in accordance with the applicable data protection regulations ("**Applicable legislation**"), including the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, which repealed Directive 95/46/EC (the "**GDPR**").
- Domestic data protection legislation in the countries in which Cellnex operates.

The GDPR is mandatory for all European Union ("**EU**") companies that process the personal data of European citizens. It is also applicable to companies established outside the EU that process EU citizens' data in relation to products or services offered to them, or to the analysis of their behaviour within the EU.

Scope of Application

This Policy is applicable to all the companies of the Cellnex Group, to its professionals in all areas and departments, as well as to any other stakeholders who are related to the entities belonging to the Cellnex Group.

3. Definitions

- **Personal data:** any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Data controller:** the natural or legal person, public authority, service or other body which, alone or with others, determines the purpose and means of the processing.
- **Data Protection Officer ("DPO"):** natural person that (i) informs and advises the data controller and data processor and the employees responsible for the processing of their obligations with respect to data protection, (ii) supervises compliance with the GDPR and other applicable data protection regulations within the Cellnex Group, (iii) offers advice on the impact assessment with regard to data protection and supervises its application and (iv) cooperates with and acts as a point of contact between the company and the supervisory authority.

- **Transfers of personal data to third countries or international organisations:** data processing that involves a transfer of the data outside the European Economic Area (“EEA”), whether as an assignment or communication of data, or in order to process data on behalf of the data controller.
- **Personal data breach:** any breach of security leading to the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or processed.

4. Basic Principles

The Cellnex Group and all its personnel must comply with the following principles relating to the processing of personal data:

- **Principle of fairness and transparency:** the personal data processing must be fair and the individuals concerned must be informed of the circumstances relating to the processing of their data in an accessible and understandable manner, using clear, simple language.
- **Principle of lawfulness:** the personal data processing can only be carried out if there is a legal basis that allows it, such as the consent of the individual concerned or another basis of legitimation such as the performance of a contract with the individual concerned, compliance with the legal obligations of the Cellnex Group, satisfaction of the legitimate interests of the Cellnex Group, etc.
- **Principle of purpose limitation:** personal data may only be processed for specific, explicit and legitimate purposes and will not be processed subsequently in a manner incompatible with said purposes.
- **Principle of data minimisation:** only personal data which are appropriate, pertinent and restricted to what is necessary in relation to the purposes for which they are obtained should be collected and processed.
- **Principle of accuracy:** the data held must be accurate and up to date; otherwise, they must be erased or rectified.
- **Principle of exercising data protection rights:** the data protection rights of the individuals concerned (access, rectification, erasure, objection, restricting processing and portability) must be respected.
- **Principle of storage limitation:** the personal data must be kept in a format that allows the data subjects to be identified for a time not exceeding that necessary to achieve the purposes for which the personal data was collected, avoiding any abuse that could breach the other data processing principles.
- **Principle of data security:** appropriate security measures must be established to protect the personal data that is being processed, including the protection thereof against unauthorized or illegal access and against loss, destruction or accidental damage.
- **Principle of accountability:** the Cellnex Group must guarantee the fulfilment of these principles by its personnel and must be able to demonstrate compliance with Applicable legislation when required. Among others, a Record of Processing Activities (RoPA) will be duly kept up to date to contribute to this purpose.

- **Principle of privacy by design and by default:** the Cellnex Group will guarantee a level of data protection security from the time when the processing media and purpose are determined and throughout the lifecycle of the data processing.

5. Strategic Lines of Action and Commitments

Roles and responsibilities

This section includes the envisaged assignment of roles and responsibilities in the organisation which, when necessary, will be complemented by a more detailed assignment under the Cellnex Group data relational governance model, the Cellnex Group body of knowledge and each local Cellnex Group organisation.

The Cellnex Group has appointed a Data Protection Officer and has designed a relational governance model composed of a global DPO and different privacy roles at local level to coordinate the DPO's function in each of the countries in which it operates.

- The DPO will be responsible for:
 - The governance, supervision and maintenance of this Policy.
 - The monitoring and measurement of the degree of compliance with this Policy and the Applicable legislation.
 - Providing advice, recommendations and clarifications to the Cellnex Group regarding the content of this Policy and the Applicable legislation.
 - Awareness-raising and training associated with this Policy and the Applicable legislation.

In the Cellnex Group:

- Employees will be required to:
 - Know their obligations and responsibilities with respect to any personal data processing they need to perform in the course of their work.
 - Process personal data in accordance with the principles laid down in this Policy and the internal body of knowledge of the Cellnex Group.
 - Ensure that third parties that require access to personal data comply with the technical and organisational measures established in the contract subscribed by any entity of the Cellnex Group.
 - Report any security incident they are aware of that may involve personal data under any circumstances.
- The different privacy responsables designated in each country associated to the Cellnex Group companies based there must:
 - Ensure that employees fulfil their roles and responsibilities in relation to personal data protection.
 - Ensure compliance with the provisions of this Policy and the Applicable legislation.
 - Implement the local procedures required to guarantee the rights and obligations set out in the GDPR, such as the management of the data subjects' rights, management and notification of security incidents or the implementation of information clauses for obtaining consent.
 - Adapt and keep up to date all the global level procedures to local specifications.

International Transfers

In order to fulfil the above objectives we need to allow Cellnex Group entities and third parties or service providers that support us in the services we offer to access your personal data.

For reasons of service efficiency, some of the aforementioned providers are located in territories outside the EEA. However, your personal data will only be transferred to a third country if there is an adequacy decision or, in its absence, providing appropriate safeguards (for instance, by signing with service providers the Standard Contractual Clauses approved by the European Commission, the content of which can be consulted here: https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en).

Data Subject Rights

The applicable data protection regulations recognise a number of rights that may be exercised by data subjects. These rights are as follows:

Right of access: right to know if your personal data is being processed or not and, if so, to be provided with certain information (including the purpose of the processing, the data categories, the data storage period or the category of the recipients).

Right to rectification: requesting the modification of inaccurate or incomplete data.

Right to erasure: requesting the elimination of your personal data.

Right to data portability: right to receive in electronic format the personal data that has been provided, and transfer them to another entity.

Right to processing restriction: requesting that the processing operations that are relevant in each case are not applied to your personal data.

Right to object: requesting that certain personal data processing is not carried out.

Right not to be subject to automated individualised decisions: requesting that personal data processing is not carried out which involves Cellnex taking decisions that affect you in a significant manner and which are carried out automatically without any human involvement.

To exercise any of your rights, please contact Cellnex at the following email address: **personaldata@cellnextelecom.com**, or by postal mail at the following address: DPO – Passeig de la Zona Franca 105 - Torre Llevant, 08038 Barcelona.

It is stated hereby that the supervisory authority covering the Cellnex Group's head office is the Spanish Data Protection Agency ("AEPD"), as the registered office of the Cellnex Group's parent company is located in Spain.

Security measures

The personal data collected by the Cellnex Group through the various channels will be processed with confidentiality and protected by adopting all necessary and reasonable technical and organizational measures, including stringent and robust security measures and technical resources, in order to prevent their alteration, loss or unauthorized processing or access, in accordance with Applicable legislation and with the other relevant and related Cellnex Group Policies available at www.cellnex.com.

- 6. Approval.** Following the favorable recommendation of the Audit and Risk Management Committee, the present Personal Data Protection Policy was approved by the Cellnex Board of Directors in its meeting held on July 31, 2024.