

MANAGEMENT/GOVERNING BODY COMMITMENT WITH DATA PROTECTION

Madrid, January 2023

The Management / Governing Body of DRAGO INGENIERÍA Y SERVICIOS, S.L., (hereinafter, the Data Controller), assumes the maximum responsibility and commitment to the establishment, implementation and maintenance of this Data Protection Policy, ensuring the continuous improvement of the data controller with the aim of achieving excellence in relation to compliance with 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 (General Data Protection Regulation) (OJEU L 119/I, 04- 05- 2016), and Spanish personal data protection regulations (Organic Law, specific sectoral legislation and its implementing rules).

The Data Protection Policy of DRAGO INGENIERÍA Y SERVICIOS, S.L., is based on the principle of proactive responsibility, according to which the data controller is responsible for compliance with the regulatory framework and jurisprudence that governs this Policy, and is able to demonstrate this to the competent control authorities.

In this regard, the data controller shall be governed by the following principles that should serve as a guide and frame of reference for all their staff in the processing of personal data:

1. Data protection by design: the data controller shall implement, both at the time of the determination of the means of processing and at the time of the processing itself, appropriate technical and organisational measures, such as pseudonymisation, designed to effectively implement data protection principles, such as data minimisation, and to integrate the necessary safeguards into the processing.
2. Data protection by default: the data controller shall implement appropriate technical and organisational measures with a view to ensuring that, by default, only personal data that are necessary for each of the specific purposes of the processing.
3. Data protection in the information lifecycle: measures ensuring the protection of personal data shall apply throughout the entire information lifecycle.
4. Lawfulness, fairness and transparency: personal data shall be processed lawfully, fairly and transparently in relation to the data subject.
5. Purpose limitation: personal data will be collected for specified, explicit and legitimate purposes and will not be further processed in a way incompatible with those purposes.

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6. Data minimisation: personal data shall be adequate, relevant and limited to what is necessary for the purposes for which they are processed.

7. Accuracy: personal data shall be accurate and, where necessary, kept up to date; all reasonable steps shall be taken to ensure that personal data which are inaccurate in relation to the purposes for which they are processed are erased or rectified without delay.

8. Limitation of the retention period: personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

9. Integrity and confidentiality: personal data shall be processed in such a way as to ensure appropriate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, by implementing appropriate technical or organisational measures.

10. Information and training: one of the keys to guaranteeing the protection of personal data is the training and information provided to the personnel involved in the processing of such data. During the life cycle of the information, all staff with access to the data shall be properly trained and informed about their obligations in relation to compliance with data protection regulations.

The Data Protection Policy of DRAGO INGENIERÍA Y SERVICIOS, S.L., is communicated to all the staff of the data controller and made available to all interested parties.

Consequently, this Data Protection Policy involves all the staff of the Data Controller, who must know and accept it, considering it as their own, each member being responsible for applying it and verifying the data protection regulations applicable to their activity, as well as identifying and providing the opportunities for improvement that they consider appropriate with the aim of achieving excellence in relation to their compliance.

This Policy will be reviewed by the Management/Governing Body of DRAGO INGENIERÍA Y SERVICIOS, S.L., as many times as deemed necessary, in order to adapt, at all times, to the provisions in force regarding the protection of personal data.



Signed: Luil/Lazaga Góngora

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