

Privacy Policy.- PROSEGUR Innovation Programme

Basic Information

Data controller: Prosegur Gestion de Activos S.L. (hereinafter, "PROSEGUR").

Main purpose of data processing: manage the participation of the company you represent or work for in the PROSEGUR Innovation Programme, and, where appropriate, in the pilot of the Programme.

Legitimation: data will be processed on the basis of legitimate interest and consent granted.

Recipients of the data:

- Third parties to whom PROSEGUR is obliged to send information, such as public authorities, security forces, judges and courts, in order to comply with the requirements of these authorities and the applicable regulations, where appropriate.
- Companies that form part of the PROSEGUR Group, in order to manage the relationship existing between you and PROSEGUR, as a result of the centralisation of administrative and computing processes within the PROSEGUR Group.

Data protection rights: you may withdraw the consent granted at any time for the personal data processing activities performed by PROSEGUR and exercise, at your discretion, your rights of access, amendment, erasure, limitation or opposition to data processing, data portability, and not being subject to automated decisions, as indicated in the section on "*Your Data Protection Rights*" in our Privacy Policy.

Additional Information

1. Data Controller

1.1. Information about the Data Controller

This document governs the privacy policy of the PROSEGUR Innovation Programme (hereinafter, the "**Programme**").

PROSEGUR forms part of an international group dedicated to private security activities. As part of its activities, five lines of business are worth particular mention: Prosegur Cash, Prosegur Security, Prosegur Alarms, Prosegur Cybersecurity and Business Process Outsourcing or BPO. The company's identity details are provided, for your information, below:

Business name: Prosegur Gestion de Activos S.L. (hereinafter, "PROSEGUR").

Tax ID No.: B-86.003.258

Address: Calle Pajaritos, 24, 28007, Madrid (Spain).

Contact: dpo@prosegur.com

1.2. Scope

This privacy policy regulates the processing by PROSEGUR of data related to employees or representatives of companies taking part in the PROSEGUR Innovation Programme. Therefore, this privacy policy contains information on data processing related to the category of interested parties mentioned.

2. Purposes and legitimisation

You are hereby informed that all the data that PROSEGUR requests or may request from you are required for the purposes described in this privacy policy and failing to provide them would make it impossible to contact you or handle the request made with PROSEGUR. Furthermore, PROSEGUR reserves the right to refrain from responding or handling requests that do not include the data requested.

You hereby guarantee the accuracy of the personal details provided to PROSEGUR. PROSEGUR may periodically ask you to review and update the personal data it holds about you.

PROSEGUR will only request and process the data necessary to manage participation in the PROSEGUR Innovation Programme, and, where appropriate, in the pilot of the Programme, and to be able to offer you information of interest to you, as an employee or representative of the company taking part in the Programme.

The following is a description of the purposes and legal grounds for processing your personal data:

i. Legitimacy on the grounds of the legitimate interests of PROSEGUR:

- a. Management of registration and participation in the PROSEGUR Innovation Programme of the company you represent or work for.
- b. Conducting online interviews to select the companies that will take part in the pilot of the Programme.
- c. Participation in the pilot of the Programme, if the company you represent or work for is selected by PROSEGUR.
- d. Sending communications related to your participation in the PROSEGUR Innovation Programme.
- e. Carrying out business process automation projects to enhance the products and services provided by PROSEGUR. The legitimate interest in this case would be to improve the efficiency and productivity of PROSEGUR activities.

ii. Legitimacy on the grounds of express consent:

- a. Sending communications related to future PROSEGUR supplier selection processes.

3. Recipients

The personal data you provide to PROSEGUR may be sent to the following recipient categories:

- Third parties to whom PROSEGUR is obliged to send information, such as public authorities, security forces, judges and courts, in order to comply with the requirements of these authorities and the applicable regulations, where appropriate.

- Companies that form part of the PROSEGUR Group, in order to manage the relationship existing between you and PROSEGUR, as a result of the centralisation of administrative and computing processes within the PROSEGUR Group.

You are hereby informed that the PROSEGUR Group may include companies outside the European Economic Area. In these instances, the parent company requires that these companies fulfil the measures designed to protect personal data established in a binding contract, unless for instances in which the European Commission has determined that the country in which the recipient is located provides an appropriate level of personal data protection.

4. Data storage

PROSEGUR will process your personal data for the time strictly necessary to fulfil the purpose indicated, and will subsequently conserve them, duly blocked, for the time during which liabilities deriving from their processing may arise.

The criteria that PROSEGUR uses to define the periods for storing your data have been established in line with the requirements established in the applicable legislation, regulations and guidelines, in addition to PROSEGUR's operating requirements relating to the correct management of its relationship with present and/or potential customers.

In the event that, following its participation in the Innovation Programme, the company you represent is not selected in the supplier selection process, your data will not be kept for more than three years, this being the period set according to the provisions of Article 45 of Act 34/2002, of 11 July, on information society and e-commerce services.

In the event that the company you represent is selected to join PROSEGUR, as a supplier, your data will not be kept for more than six years from the end of any possible contractual relationship between you and PROSEGUR, this being the period set for holding blocked data in accordance with commercial regulations, and in particular with the provisions of the Commercial Code.

Notwithstanding the foregoing, in the event that legal proceedings are taken against you, your data may be stored in a blocked format for the additional amount of time required until the final legal ruling is issued. Once this period comes to an end, your data will be deleted.

5. Your data protection rights

You can contact PROSEGUR, whenever you think it necessary, to exercise your rights of access, rectification, cancellation, limitation and opposition, in addition to the right of portability and to not be subject to automated decisions, by writing to Prosegur Gestión de Activos, S.L. at Calle Pajaritos, 24, 28007, Madrid (Spain), or the following email address: protecciondedatos@prosegur.com, attaching documentation to prove your identity.

Furthermore, you are hereby informed that you may withdraw your consent whenever you so desire by contacting PROSEGUR at the address or email address mentioned above.

Finally, in the event that you would like to receive further information on your data protection rights or would like to file a claim, you can contact the Spanish Data Protection Agency at Calle Jorge Juan, 6, 28001, Madrid (Spain) to safeguard your rights.

6. Data security

PROSEGUR has appropriate policies and technical and organisational measures in place to safeguard and protect your personal data against illegal or unauthorised access, accidental loss or destruction, damage, use or illegal or unauthorised dissemination. You can obtain a copy of the measures required by PROSEGUR by contacting the Data Protection Officer.

We will also take all the reasonable measures to ensure that our staff and employees who have access to your personal data have received appropriate training.



In any case, the user is hereby informed that any disclosure of data online is not completely secure and, therefore, he/she proceeds at his/her own risk. Although we will do our utmost to protect your personal data, PROSEGUR cannot guarantee the security of the personal data sent via our website.

© 2020. Prosegur Gestion de Activos S.L. All rights reserved.