

## PRIVACY POLICY

### SCOPE OF APPLICATION

CASTELLANA PROPERTIES SOCIMI S.A. (hereinafter, "CASTELLANA") is committed to protecting the privacy of customers and users accessing the website <https://www.castellanaproperties.es/> (hereinafter, the "Website").

The contents of the Website are owned, operated, licensed or controlled by CASTELLANA.

Use of this Website confers the status of user (hereinafter, the "user").

The user can browse and use the Website without having to provide any personal data. The only personal information that CASTELLANA will have access to will be that which the user voluntarily provides through the forms available for this purpose, or through contacting CASTELLANA by e-mail or via any other way provided on the Website. If personal data is collected through cookies, you will be duly informed of this in the Cookies Policy, as well as through the channels required by current legislation.

This document presents our policy on the observance and use of personal data collected through our Website or through auxiliary devices such as mobile phones or tablets. Similarly, use of the Website implies acceptance by the user of the provisions contained in this Privacy Policy and of their personal data being processed as stipulated therein.

Please note that although our Website may contain links to other sites, this Privacy Policy applies only to this Website and not to the sites of other companies or organisations to which links on the Website may redirect to. CASTELLANA does not control or endorse the content of third-party sites and accepts no responsibility for the content or privacy policies of such sites.

### PROTECTION OF PERSONAL DATA

In view of the above, and in compliance with the provisions of 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 in compliance with the provisions of current legislation, we hereby provide information on the following points:

The **Data Controller** of your personal data is:

CASTELLANA PROPERTIES SOCIMI S.A.

C.I.F. A-87293015

Address: Glorieta Rubén Darío, 3, 1º derecha, 28010, Madrid.

**Data processed, registration of processing activities and purpose of same.** With regard to the processing of the personal data provided to us, or any other personal data that may arise during the performance of a service for the user, we inform you that such data will be incorporated into the existing data processing system, which is owned by and is the responsibility of CASTELLANA, and that the user expressly consents to the processing of said personal data in a lawful, loyal, fair, transparent, appropriate, relevant, limited, accurate and up-to-date manner for:

PURPOSE	LEGAL BASIS FOR DATA PROCESSING
Attending and resolve user requests or requests that can be made through the contact email of our website.	Legitimate interest, the consent of the interested party when completing and sending the form and, in the case that the request is related to the exercise of rights, our legitimacy will be in compliance with a legal obligation.
Data processing for statistical purposes, to improve the quality of the services provided.	The basis of legitimation is the legitimate interest, since through these statistics we can improve the website by offering superior quality.

Children under the age of 18 may only use the Website under the supervision of a parent or guardian.

To this end, the user provides the following information: name and surname, email address, company name in addition to the information they provide in the message.

We do not make automated decisions based on profiles, with the exception of customising advertising and to prevent Internet fraud.

**The personal data storage period** will be the time needed for complying with the legal obligations related to the services provided.

The information collected by our cookies is stored for a **maximum period of two years**.

**Transfer of personal data.** The information related to our clients is very important for us, so we will only give data for specific purposes and we will always inform you of it.

Users' data will be transferred to:

- Banks, public administrations and entities necessary to comply with the provision of the service and billing obligations.
- Companies that are part of the CASTELLANA PROPERTIES Group, with the purpose of being able to properly manage your contractual or pre-contractual relationship, as a result of the centralization of administrative and IT processes existing within the Group, as well as for commercial purposes in the event that you have the consent for it.
- Data Processor for the necessary treatment for the provision of the service with which we have signed a contract for the provision of services that requires them to keep some confidentiality duties and some security measures.

**User rights.** Users may at any time exercise their rights of access, rectification, limitation of processing, suppression, opposition, portability and the right not to be subject to individual decisions by sending a signed written request, including their full name and a photocopy of their ID card or other valid supporting document, to CASTELLANA PROPERTIES SOCIMI S.A., at the above address or to email address [datos@castellanaproperties.es](mailto:datos@castellanaproperties.es)

The exercise of these rights is free of charge, unless unfounded or excessive requests are made, in which case the user will bear the cost of processing the request.

You are also informed that you may contact the relevant supervisory authority to submit any complaint you consider appropriate.

**Data collection through devices such as mobile phones or tablets.** When you use the website created by CASTELLANA, if applicable, we may receive information about your location and your mobile device or tablet, including a unique identifier for such devices. We may use this information to provide you with location-based services such as search results and other personalised content. Most mobile devices allow you to disable these location-based services.

**Security measures.** CASTELLANA informs you that it has adopted the necessary technical and organisational measures to maintain the level of security required for the personal data processed and has also implemented the necessary mechanisms to prevent, where possible, unauthorised access, theft, unlawful modifications and loss of data.

We have physical, electronic and procedural security systems in place in relation to the collection, storage and disclosure of users' personal information. Our security procedures may require us to ask you for proof of identity from time to time before we can provide you with confidential information.

## **INTERNATIONAL TRANSFERS**

CASTELLANA services can be offered using resources and servers located in different countries (such as Spain and South Africa).

Therefore, your information can be processed outside the country where the service you are using is located, including countries outside the European Economic Area (EEA) where the privacy protection standard does not meet the requirements established by the Commission European (like the US).

By transferring information, we comply with all applicable laws to ensure adequate protection of your privacy. In general, when transferring your personal data from one country to another, we apply the terms of the agreements of the EU-US Privacy Shield. and the Swiss-US Privacy Shield. or agreements based on the standard contractual clauses of the European Commission. You can contact us using the contact information provided below.

Your information can be transferred or access can be granted to the subcontractors of CASTELLANA who carry out tasks related to the website. Our subcontractors are not authorized to use the personal data for any other purpose and the services of CASTELLANA subcontractors are always covered by a confidentiality clause.

CASTELLANA never discloses your personal data without your specific consent, unless it is necessary to carry out your request or manage our interactive programs for clients. However, the information may be disclosed if required by law, a court order or a regulation or request issued by the authorities.

For statistical purposes, CASTELLANA can provide trusted third parties with statistical data collected about their customers, sales, traffic types, exercise information and similar information from the website to trusted third parties. These statistics do not contain personal data that can identify you.

## **CONFIDENTIALITY**

In accordance with current regulations, CASTELLANA undertakes to comply with its obligation of secrecy with respect to the personal data provided by the user when browsing this Website, and with its obligation to keep such data confidential.

## **USE OF THIRD-PARTY COOKIES**

Without prejudice to the Cookies Policy, this Website uses Google Analytics, a web analytics service provided by Google, Inc. a Delaware company whose main office is at 1600 Amphitheatre Parkway, Mountain View (California), CA 94043, United States ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the website. The information generated by the cookie about your use of our Website

(including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information on our behalf in order to track your use of the Website and will compile reports on the Website activity and provide other services relating to the Website activity and Internet usage. Google may also transfer this information to third parties if required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the processing of data or information by rejecting the use of cookies, which you can do by selecting the appropriate settings on your browser. However, by doing this you might not be able to use the full functionality of this Website. By using this Website you consent to Google processing data about you, in the manner and for the purposes stipulated above.

### **INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS**

All the contents of the Website are protected by intellectual property rights. This content includes, but is not limited to, the graphic design, source code, logos, texts, graphics, illustrations, photographs, language code, software and other elements that appear on the Website. Therefore, the user acknowledges that the reproduction, distribution, commercialisation, transformation and, in general, any other form of exploitation, and by any means, of all or part of the contents of this Website constitutes an infringement of the intellectual and/or industrial property rights of CASTELLANA or of the owner of the same.

Trademarks or distinctive signs of any kind contained in the Website are also protected by law.

Under no circumstances may the user modify or use such intellectual or industrial property in such a way that its disclosure would be detrimental to CASTELLANA, in which case CASTELLANA shall claim for any damages arising from the improper use by third parties of its intellectual or industrial property.

CASTELLANA does not grant any license or authorisation of use of any kind for its industrial and/or intellectual property rights or any other property or right related to the Website, services or contents.

### **AUTOMATIC INFORMATION**

The following are examples of the information we collect and analyse: The Internet IP address you use to connect to the Internet with your computer, your email address, username and password for your account, information about your computer and Internet connection and your browser type and version, your time zone settings, your browser connection type and version, the operating system and platform you use, your "visit history" (URL) from, through and to our Website (including date and time), number of cookies, and any phone numbers you have used to call our customer service. We may also use browser data such as cookies, Flash cookies (also called local shared objects), or similar data at certain locations on our Website to prevent fraud, among other purposes. During your visits to the Website, we may use software tools to measure and collect session information, including page response times, download errors, duration of visits to certain pages, information about how you interact with the page (mouse clicks, page

scrolling and the number of times you mouse over certain items), and how you leave the website. We may also collect technical information to help us identify your device for diagnostic analysis and fraud prevention purposes.

### **NOTICES AND REVISIONS**

If you have any questions regarding CASTELLANA's Privacy Policy please send us an email with your enquiry to [datos@castellanaproperties.es](mailto:datos@castellanaproperties.es) and we will try to answer them.

CASTELLANA may modify and update this Privacy Policy at any time without prior notice. Please always check that you are aware of our Privacy Policy, Cookies Policy and Terms and Conditions of Use to stay informed at all times of the content that is collected through the Website, how we use it and the circumstances under which it may be disclosed to third parties. The user shall be automatically bound by the Terms and Conditions of Use in force at the time of accessing the Website, so you should read this document periodically.

### **FINANCIAL AND STOCK MARKET INFORMATION**

This website does not provide any kind of investment recommendation, legal, tax or any other kind of advice.

The website allows to know the evolution of the shares of CASTELLANA in the Alternative Stock Market, as well as offering the main financial information of the company in the previous fiscal years.

The information is of general scope and in no case takes into account criteria or specific or particular objectives of investment or financial situation. Therefore, the information contained should not be used to make investments or make decisions.