



## **Guide to the Data Protection Program for company employees, management and directors**

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El Cox Group has implemented a specific personal data protection program to make all its employees and their corresponding spheres of influence aware of its corporate compliance policy. This program seeks to promote lawful and ethical conduct, while trying to prevent any actions and omissions that breach this policy and the resulting liability, investigating them when they arise.

All Cox Group employees are required to fully comply with data protection laws to ensure that the company retains the confidence of its clients and the authorities, and to protect its businesses from any breach and the resulting liabilities, thereby improving its reputation.

The majority of countries and jurisdictions have obligatory regulations or guidelines on market practices in relation to how companies hold and use individuals' personal data.

The conduct that is expected from employees, as well as conduct that is forbidden, is as follows:



### **Expected conduct:**

- Organize their data files (accesses, deletions/new records, etc.).
- Register or notify the files with the supervisory government authority, if required, as well as the quality of the data, and obtain consent from the party in question.
- Notify the government authority (national/federal or state/regional) responsible for supervising the data protection act, of the existence of the database and the contents of the database, if appropriate.
- Maintain the applicable security measures to protect the file.
- Implement technical and organizational measures to manage the file.
- Ensure that the data remains strictly confidential.

### **Forbidden conduct:**

- Hold or obtain data without the consent of the affected party or when this is opposed by the affected party.
- Transfer of data without consent.
- Processing of personal data.
- Dissemination or publication of data out of context.
- Creation of user profiles based on previously obtained data.

If there is evidence, proof or suspicion that a Cox Group employee, competitor, client or supplier is breaking data protection laws, it must be reported in accordance with the "Whistleblower Channel" section.

Breaches of data protection laws may result in severe and personal consequences. In many countries, companies that are found guilty of such offences may be subject to criminal and civil sanctions including fines and custodial sentences.