

Data Privacy Policy

Type: Policy	Classification: Global	Code: X
Proprietary: Human Resources and Legal Services Department		Revision: 0

Objective

Dynasol Group in (hereinafter 'Dynasol') strives to comply with the main Privacy and Data Protection standards, as well as the relevant legislation in this area.

This document contains Dynasol's general lines of action in terms of data protection.

The principal objectives of the Data Privacy Policy are:

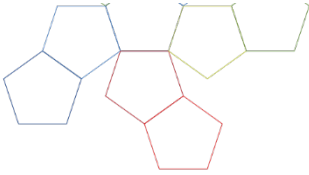
- Ensure that all personal information in Dynasol's custody is adequately protected against threats to maintain its security.
- Ensure that the interested parties linked to Dynasol have full knowledge of the contractual, legal or regulatory implications of any breach of privacy.
- Limit the use of personal information to the purposes for which the information was collected.
- Create awareness of privacy requirements so that they are an integral part of every employee's daily operation and ensure that all employees understand the importance of privacy practices and their responsibilities to maintain privacy.
- Inform all employees of the processes that must be followed for the collection, lawful use, disclosure/transfer, retention, archiving, and deletion of personal information.
- Ensure that all third parties that collect, store and process personal information on Dynasol's behalf provide adequate data protection.
- Ensure compliance with applicable regulations and contracts regarding the maintenance of privacy, protection, and cross-border transfer of personal information.

Area of Application

This policy is applicable to all employees, suppliers, distributors, interns, customers, partners or any other interested parties who may receive personal information from Dynasol, who have access to personal information collected or processed by or on behalf of Dynasol who provide information to Dynasol .

This policy covers the treatment of personal information collected and used by Dynasol for the Group's own commercial purposes. It also covers personal information that we share with authorized third parties or third parties that share information with us.

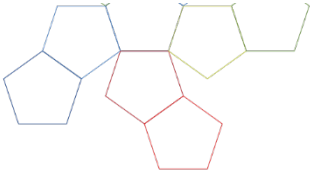
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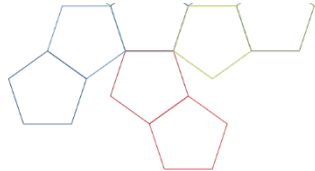
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1. Definitions and Abbreviations

1.1. Definitions

- **Interested Party:** Holder of the data object of a treatment activity.
- **Information Security:** Preservation of confidentiality, integrity and availability of information; in addition, other properties, such as authenticity, accountability, non-repudiation, and reliability, may also be involved.
- **Personal Data or Personal Information:** Any information that relates to a physical person, which directly or indirectly, in combination with other available information, is capable of identifying said person.
- **Third Parties:** All external entities – including, but not limited to, suppliers, trainees, distributors, service providers and partners – that have access to Dynasol information assets, information systems or that transmit personal information from them.

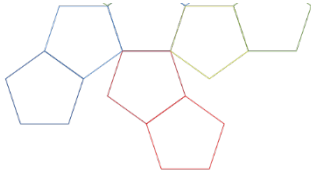


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2. Development

- Dynasol's Data Privacy Policy aligns with generally accepted privacy principles. In view of the continuous change in the legislative and technological environment, the Data Protection Policy will be subject to revisions. The guiding principles of privacy that are articulated in this policy are the following:
 - **Policy and Privacy Management:** Define, document, communicate, and assign responsibility for Dynasol's Data Privacy Policy and Procedures.
 - **Information to the Interested Party:** Provide information to the interested party on Dynasol's Data Privacy Policy and Procedures and identify the purposes for which personal information is collected, used, retained and disclosed.
 - **Choice and Consent:** Describe the options available to the individual and obtain implicit or explicit consent regarding the collection, use or disclosure of personal information.
 - **Collection and Use of Personal Information:** Collect personal information only for the purposes identified in the information offered to the interested party.
 - **Use:** Use personal information only for the purposes identified in the information provided to the interested party.
 - **Limitation of Use, Disclosure, and Retention:** Limit the use, storage and retention of personal information for the purposes identified in the data privacy notice and for which the individual has provided their explicit or implicit consent. Retain personal information only for as long as necessary to fulfill stated purposes or as required by law or regulation, and then appropriately dispose of this information.
 - **Access for Review and Update:** Provide the interested party with access to their personal information for review and updating.
 - **Disclosure to Third Parties:** Disclose personal information to third parties only for the identified purposes and with the implicit or explicit consent of the individual.
 - **International Data Transfers:** It occurs when personal data that is processed by a controller or processor in the European Economic Area (EU countries, Iceland, Liechtenstein and Norway) is sent to a third country or international organization, outside that territory.
 - **Security Practices for Privacy:** Protect personal information against unauthorized access.
 - **Quality of Personal Information:** Keep personal information accurate, complete, and relevant for the purposes identified in the notice.



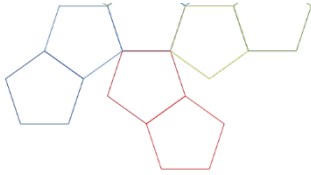
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- **Privacy Monitoring and Compliance:** Oversee compliance with Dynasol's Data Privacy Policy and Procedures, and have procedures to address privacy-related complaints and disputes.
- **Data Processing Activities of the Interested Party:** Offer information about the data processing carried out by Dynasol.

2.1. Policy and Privacy Management

- A responsible person or a group of people must be designated who are responsible for the company's Data Protection to process complaints and requests for information related to Dynasol's privacy practices.
- Establish procedures for the identification and classification of personal information.
- Dynasol's Privacy Policy statement will be available to interested parties.
- The Data Privacy Policy will be communicated to Dynasol's internal staff.
- Changes or updates to the Data Privacy Policy will be communicated to Dynasol's internal staff when the changes are in force.
- Establish procedures for mandatory registration.
- Risk assessment will be carried out on a regular basis to ensure that risks to personal information are identified and mitigated.
- The potential impact on data privacy is assessed when new processes involving personal information are implemented or when significant changes are made to those processes.

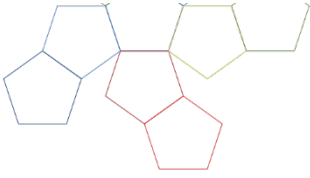


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2.2. Information to the Interested Party

- The figure responsible of the data treatment will provide an informative document on data protection to the interested parties at the time the personal information is collected.
- The information notes, policies, procedures or other statements will provide complete information to the interested party on how their personal information will be used so that the use of Dynasol is fair and legal.
- The following information should be considered for inclusion in the briefing notes (as appropriate in individual circumstances):
 - Clearly define the purpose for which personal information is collected, used and disclosed.
 - Define the information retention period.
 - Inform the data subject that personal information will only be collected for the identified purposes.
 - Inform that the personal information of a data subject will only be disclosed to third parties for identified legal business purposes and with the consent of the physical person, whenever possible.
 - Inform that the personal information of an interested party may be transferred within Dynasol entities, as needed, for business purposes with the appropriate security measures required by law.
 - Inform of the consequences of withholding or withdrawing consent for the collection, use and disclosure of information for identified purposes.
 - Inform the interested party of their responsibilities to provide Dynasol with accurate and complete personal information. In the event that a modification of the data is required, the interested party must contact Dynasol to correct said information.
 - Define the process for an individual to view and update their personal information records.
 - Establish the process that the interested party must follow to register a complaint or claim regarding Dynasol's privacy practices.
 - Define the contact information of the person in charge of privacy practices and responsible for privacy issues with Dynasol management.



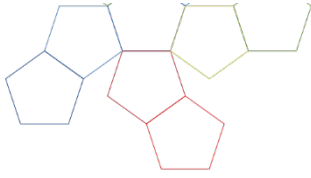
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- Inform the process to be followed by the interested party to withdraw their consent for the collection, use and disclosure of their personal information for the identified purposes.
- Implicit or explicit consent to the collection, use and disclosure of personal information, unless a specific law or regulation or otherwise requires or permits.

2.3. Choice and Consent

- The implicit or explicit consent of the interested party must be obtained at the time of collection of the personal information or as soon as possible thereafter.
- Explicit consent must be obtained from interested parties for the collection, use and disclosure of sensitive personal information, unless there is a specific law or regulation that requires or permits otherwise. A record of the explicit consent obtained from the interested parties will be kept.
- Consent from the interested party must be obtained before their personal information is used for purposes not previously identified.



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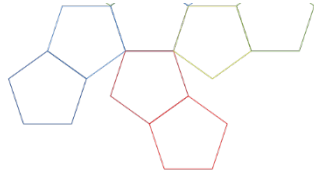
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2.4. Collection of information from Interested Party

- The collection of personal information will be limited to the minimum requirement for group business purposes:
- Dynasol must guarantee that the personal information of the interested party is obtained:
 - Fairly, without intimidation or deception, and
 - Legally, by adhering to laws and regulations related to the collection of personal information.
- Each Directorate/holder of a contractual relationship with third parties will supervise that they collect personal information:
 - Use fair and legal data collection methods, and
 - Comply with Dynasol's Personal Data Protection Corporate Standard and their contractual obligations regarding the collection, use and transfer of personal information on behalf of Dynasol.

2.5. Limitation of Use, Disclosure, and Retention

- Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.
- The retention of personal information will be only for the time necessary to fulfill the identified legitimate business purpose or as prescribed by law.
- Guidelines and procedures must be followed for the retention and deletion of personal information considering the minimum and maximum retention periods and storage modes.
- Upon expiration of the identified legitimate purposes or withdrawal of consent, Dynasol will securely erase or anonymize the personal information of the interested party.



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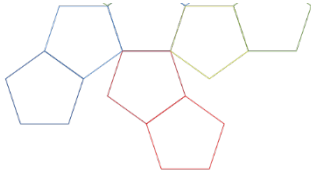
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2.6. Access for Review and Update

- In cases where the interested party wants to access the review and update of their data, the procedures will be defined for:
 - Request access to your data or personal information as prescribed by law;
 - Correct or update your data or personal information, and
 - Withdraw consent to the collection, use and disclosure of your personal information.
- The identity of the interested party requesting access to their personal information, or the identity of data subjects authorized by the data subject to access the data subject's information, must be verified before providing access to such information.
- A response will be provided to data subjects requesting access to their personal information in an accessible form, within a defined period of time from receipt of the complaint/request as prescribed by law.
- The interested parties will be notified in writing of the reason for the denial of requests for access to personal information to the extent required by applicable law.

2.7. Disclosure to Third Parties and International Transfers

- Personal information will be disclosed to third parties only after obtaining the appropriate consent of the interested party, unless otherwise permitted or required by law or regulation.
- Whenever reasonably possible, each Management/holder of a contractual relationship with third parties will ensure that those who collect, store or process personal information on behalf of Dynasol have:
 - Signed agreements to protect personal information in accordance with Dynasol's Data Privacy Policy or measures implemented as prescribed by law.



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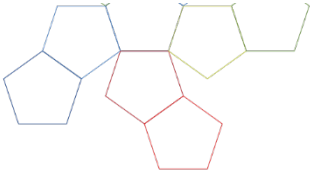
- Signed confidentiality agreements or confidentiality agreements that include privacy clauses in the contract.
- Procedures in place to comply with the terms of your agreement with the Company to protect personal information.

Personal information may be transferred outside the geographic areas where Dynasol operates storage or processing in any of the following cases:

- The individual has consented to the transfer of information
- The transfer is necessary for the execution of a contract between the individual and Dynasol, or the implementation of pre-contractual measures taken in response to the request of the interested party.
- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between Dynasol and a third party.
- The transfer is necessary or legally required for important reasons of public interest or for the recognition, exercise or defense of a right in legal proceedings.
- The transfer is required by law.
- The transfer is necessary to protect the vital interests of the individual.
- The transfer is made under a data transfer agreement.
- The transfer is legitimized by applicable law.
The transfer is within the scope of labor relations between the owners and any of the companies of Dynasol Group.

Corrective action will be taken in response to the misuse or unauthorized disclosure of personal information by a third party that collects, stores or processes personal information on Dynasol's behalf.

2.8. Security Practices for Privacy



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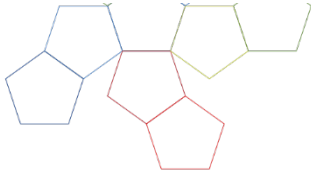
- Dynasol's information security policy and procedures will be documented and implemented to ensure the reasonable security of personal information collected, stored, used, transferred and made available by Dynasol.
- The person designated by the Control Body must establish procedures that maintain the logical security of personal information.
- The person designated by the Control Body must establish procedures that guarantee the protection of personal information against accidental disclosure due to natural disasters and environmental risks.
- The person designated by the Control Body must establish incident response procedures to deal with incidents related to personal data or privacy practices.

2.9. Quality of Personal Information

- Dynasol will ensure that the personal information collected is relevant for the purposes for which it will be used.
- Dynasol will periodically validate that the personal information collected is accurate and complete for the purposes for which it will be used.

2.10. Privacy Monitoring and Compliance

- Procedures must be established to register and respond to the complaints / claims registered by the interested parties.
- Each complaint related to privacy practices registered by the data subjects will be validated, and the responses documented and communicated to the individual.
- A record of breaches identified in annual privacy reviews will be maintained. Corrective and disciplinary actions should be initiated and monitored through closure.
- Procedures should be established to monitor the effectiveness of controls for personal information and to ensure corrective action, when necessary.
- Any conflict or disagreement related to the requirements of this policy or the associated privacy practices will be referred to the data protection control body.



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2.11. Dynasol Employee Personal Identifiable Information

- Data protection laws govern the use of personally identifiable information, which is any personal information related to the individual that can identify him or her.

2.12. Data Processing Activities of the Interested Party

- Personal information about individuals may only be processed for a legitimate purpose. Dynasol can carry out a series of activities with the personal information of the interested parties who must be duly informed.
- In order to fulfill the purposes set forth above, Dynasol may disclose personal information to suppliers and distributors who provide services to Dynasol and who may assist in the processing activities set forth above and also to law enforcement agencies, regulatory bodies, government agencies, and other third parties as required by law or for administrative/tax purposes, to the extent permitted and required by local laws.
- Dynasol may disclose your personal information to third parties for the purpose of establishing and administering your employment relationship.
- Dynasol will take appropriate steps to ensure that its suppliers and distributors also process personal information in a compliant manner and such steps may include a data processing agreement.
- Dynasol may transfer personal information to other group companies, partners, suppliers, law enforcement agencies in accordance with current laws and regulations.

3. How to Request Information

Dynasol Group has a control body that guarantees compliance with current data protection regulations, which can be contacted through the email address datos.personalesdyna@dynasol.com