

Innova-tsn (and its subsidiaries Innova-tbs, Innova-tmx and Innova-tsn SAS) is a company with a determined ambition to be a referent in the technological sector of Cloud Strategy and Architecture, Machine Learning, Deep Learning and Artificial Intelligence and Data Analytics & Modern BI. To this end, it assumes values that it considers essential for the achievement of its objectives, such as the quality of the solutions it proposes to its customers, the protection of the environment, the preservation of its own information and personal data and those of the other stakeholders, and the professional and personal development of all the members of its work team.

In the social and economic context we are living through, characterised by the growing interconnection between agents, the field of influence of our actions is notably widened. Therefore, the company's responsibility in making decisions whose results affect different groups (customers, workers, suppliers, society and shareholders) is greater.

On the other hand and due to our activity at Innova-TSN, we are aware that information is an asset with a high value for our organization and it requires, therefore, appropriate protection and management with the purpose of giving continuity to our business line and minimising the possible harm caused by failure to the integrity, availability and confidentiality of the information. Likewise, both the current legislation concerning personal data protection (GDPR and LOPDGGDD) and Innova-TSN's commitment to our customers make us particularly sensitive to the processing of the personal data we have access to in the performance of our activities.

In coincidence with the Excellence in Sustainability Club, Innova-TSN bases its business philosophy on key aspects such as:

- Responsible competitiveness and innovation in products and services
- Social action.
- Dialogue with the groups of interest.
- Corporate governance and ethical management.
- Environmental preservation and improvement.
- Work-life balance.
- Equal opportunities for groups with special needs.

The organisation is committed to the application of the contents of the United Nations' Global Compact and the Sustainable Development Goals set out in the UN 2030 Agenda and to the preservation of the natural environment its activities take place in. As an example of this, Innova-tsn has an integrated environmental information management security and quality system and promotes its own Policy in accordance with ISO standards 9001, 14001, 27001 and 27701 for whose development, it assumes the following principles as their own:

- To set as a fundamental goal the development of technological solutions and services with an absolute respect for the ISO quality standards, preserving the information, with special attention to the sensitivity of the personal data processed, with all the available necessary measures.
- To apply the continuous improvement principle to all the organisation's processes, operations and technological solutions and services developed with the additional aim of achieving the highest degree of satisfaction of the customers.
- To prevent pollution and minimise as far as possible the impact of activities on the environment by identifying and assessing the aspects over which the organisation can have an influence, measuring annually the carbon footprint generated by the organisation and implementing the most appropriate tools for the rational use of resources and the reduction in the generation of emissions and waste.
- To ensure the compliance with the applicable legal and regulatory requirements (particularly, those concerning personal data protection), as well as the ones the organization has voluntarily assumed in the development of the Corporate Social Responsibility and the Code of Conduct.
- To foster the participation, communication, information, and training of the professional team with the aim of making them feel part of the organisation's work as a whole.
- To promote the commitment to responsibility between team members in accordance with the quality, privacy and information security requirements agreed both internally and with the customers and with the environmental criteria set by means of adequate and regular awareness-raising and training actions.
- To ensure business continuity by developing continuity plans in accordance with recognised methodologies.
- To make and periodically review a risk analysis based on recognised methods which allow us to set security and privacy levels of both the personal data and the information in general and of the ongoing projects and services and minimise the risks through the development of specific policies, technical solutions and contract agreements with specialised organisations.
- Commitment to provide information to stakeholders.
- Selection of suppliers and subcontractors based on quality, environmental and information security and privacy criteria.

With specific regard to the protection of personal data, Innova-TSN undertakes to comply with the principles indicated in the legislation in question. These are:

- "Lawfulness, fairness and transparency" principle. Data must be processed in a lawful, fair and transparent manner for the data subject.
- "Purpose" principle: Data must be processed with one or several specific, explicit and legitimate purposes and on the other hand, it is prohibited that the data collected with specific, explicit and legitimate purposes are processed later on in a manner incompatible with these purposes.

- "Data minimisation" principle. To implement technical and organisational measures to ensure that only data that are necessary for each of the specific purposes of the processing are processed, reducing the extent of the processing, limiting to what is necessary the storage period and its accessibility. "Accuracy" principle: To take reasonable steps to ensure that data are kept up to date, deleted or amended promptly where they are inaccurate in relation to the purposes for which they are processed.
- "Storage limitation" principle: The retention of data should be limited in time to the achievement of the purposes for which the data are processed.
- "Security" principle: To conduct a risk analysis aimed at determining the technical and organisational measures necessary to ensure the integrity, availability and confidentiality of the personal data processed. "Active accountability" or "demonstrated accountability" principle. To maintain due diligence on an ongoing basis to protect and guarantee the rights and freedoms of the natural persons whose data are processed on the basis of an analysis of the risks that the processing represents for those rights and freedoms, so that we can guarantee and demonstrate that the processing complies with the provisions of the UE GDPR and the Spanish LOPDGD, the UK GDPR 2018 and the 2018 Data Protection Act, the Ley Federal de Protección de Datos Personales en Posesión de los Particulares of 5 July 2010 in Mexico and the Ley de Protección de Datos Personales or Ley 1581 de 2012 in Colombia.

This declaration must be a living document in constant change with a focus on revision and adaptation to new situations that the organisation may face in its quest for continuous improvement.

Innova-tsn's general management are committed to supporting and promoting the principles set out in this Policy, for which it asks the company's staff to assume and abide by the provisions of the Integrated Management System Manual.

SGD: José Antonio Luque - CEO

A handwritten signature in blue ink is written over a blue ink stamp. The stamp contains the text: 'innovación tecnológica y soluciones de negocio, s.l.' and 'C.I.F. B-84006246'.