



PRIVACY POLICY OF WHISTLEB[®] OF THE NUEVA PESCANOVA GROUP

2nd version approved by Agreement of the Compliance Unit of the Nueva Pescanova Group on 1 AUGUST 2023

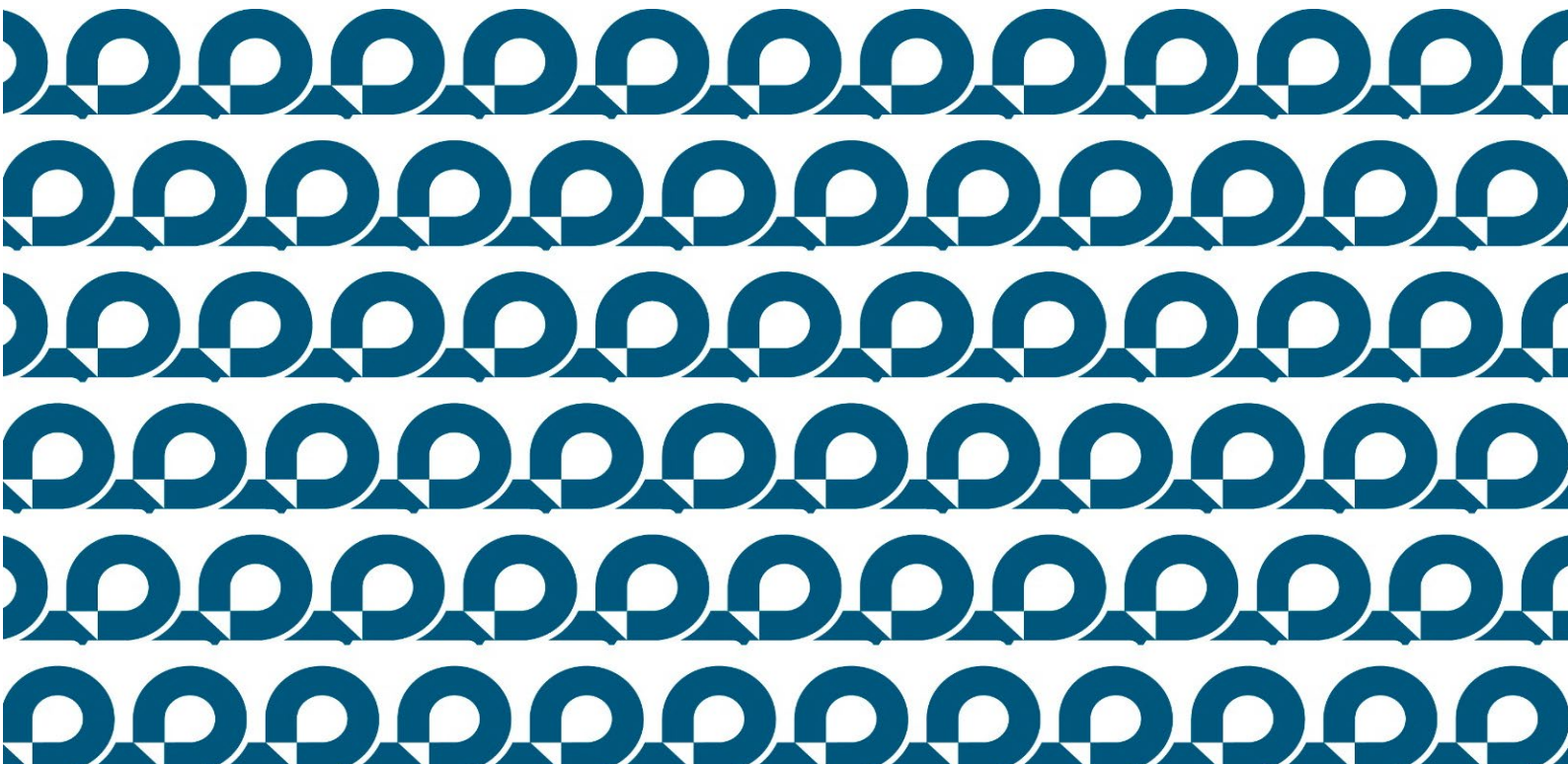


TABLE OF CONTENTS

I.	<i>OBJECTIVE OF THIS POLICY</i>	3
II.	<i>DATA CONTROLLER</i>	3
III.	<i>DATA PROCESSOR</i>	3
IV.	<i>PROCESSED PERSONAL DATA AND COLLECTION METHODS</i>	4
V.	<i>PURPOSE OF THE PROCESSING</i>	4
VI.	<i>BASIS OF LEGITIMACY FOR PROCESSING</i>	4
VII.	<i>STORAGE PERIOD</i>	4
VIII.	<i>ACCESS AND COMMUNICATION OF PERSONAL DATA</i>	5
IX.	<i>INTERNATIONAL TRANSFER OF DATA</i>	5
X.	<i>EXERCISE OF RIGHTS</i>	5
XI.	<i>REPEALING PROVISION</i>	6
XII.	<i>APPROVAL, AMENDMENT, ENTRY INTO EFFECT AND DURATION</i>	6
XIII.	<i>CONTROL OF AMENDMENTS</i>	6

I. *OBJECTIVE OF THIS POLICY*

1. The objective of this Privacy Policy is to provide users with the necessary information on personal data processing arising from the use of the technological tool *WhistleB*[®], in compliance with the information duties that this regulation on personal data protection imposes on the Data Controller; namely: (i) Data Controller and, if applicable, Data Processor; (ii) Data Protection Delegate, if duly and lawfully designated by the Controller; (iii) Processed data and their source or collection methods; (iv) Purposes and basis of legitimacy for processing (v) Data recipients; (vi) Data subject rights; (vii) Storage period; and, when applicable, (viii) International transfer of data.
2. This Privacy Policy of *WhistleB*[®] complements the provisions on confidentiality and personal data protection set forth in the Regulation of the Compliance Channel of the Nueva Pescanova Group, which also applies to the personal data processing carried out by *WhistleB*[®].

II. *DATA CONTROLLER*

1. The Data Controller of the personal data collected from the communications through *WhistleB*[®] is the Spanish parent company of the Nueva Pescanova Group **NUEVA PESCANOVA, S.L.** (hereinafter, "**NUEVA PESCANOVA**"), with Tax Identification Number (NIF) n° B-94123908, registered in the Mercantile Register of Pontevedra, on sheet 40, of Companies Book 4054, 1st entry on page PO-58757 and with registered office at Rúa José Fernández López s/n, 36320, Chapela-Redondela-Pontevedra-Spain.
2. **NUEVA PESCANOVA** undertakes to protect your privacy and ensures compliance with the personal data protection legislation, particularly with *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 repealing Directive 95/46/EC* (General Data Protection Regulation or "**GDPR**") and the *Spanish Organic Law on Protection of Personal Data and Guarantee of Digital Rights* ("**LOPDGDD**", by its Spanish acronym). Your personal data shall be processed lawfully, fairly and in a transparent manner; collected for specified, explicit and legitimate purposes; and only if adequate, relevant, and limited to what is necessary in relation to these purposes. Moreover, data shall be stored accurately and shall be kept up to date and in a form which permits their identification, where applicable, and only for as long as necessary for the fulfilment of the processing purposes.
3. **NUEVA PESCANOVA** has implemented the necessary technical and organisational measures to protect your personal data from accidental loss or alteration, unauthorised use, or disclosure. Procedures have also been established to respond to any security breach that may affect your personal data.
4. For the companies of the Nueva Pescanova Group in Spain, **NUEVA PESCANOVA** has appointed the *Data Protection and Privacy Committee of the Nueva Pescanova Group* (comite.datos.privacidad@nuevapescanova.com) before the Spanish Data Protection Agency (AEPD) as the Data Protection Delegate (DPD). Any question related to this Personal Data Protection Policy may be raised before this Committee, without prejudice to the exercise of your individual rights over your personal data before the Compliance Unit, as set forth in Section X of this Policy.

III. *DATA PROCESSOR*

1. **NUEVA PESCANOVA** has contracted with the Swedish company **WHISTLEB WHISTLEBLOWING CENTRE AB** (registered office at the World Trade Centre, Klarabergsviadukten 70, SE-107 24, Stockholm, Sweden) for the licensing of their the technological tool *WhistleB*[®]. The latter has signed the required data processing agreement, therefore acting as Data Processor.
2. Neither *WhistleB* nor its suppliers (sub-processors), when applicable, can decrypt or read the messages collected through the *WhistleB*[®] Compliance Channel of the Nueva Pescanova Group. They also do not have access to their readable content. *WhistleB*[®] ensures your privacy, as well as the compliance with the regulation on the protection of personal data (specially the GDPR) and has implemented the

necessary technical and organisational measures to protect your personal data from accidental loss or alteration, unauthorised use, or disclosure. Procedures have also been established to respond to any security breach that may affect your personal data.

IV. PROCESSED PERSONAL DATA AND COLLECTION METHODS

1. The personal data collected and processed shall depend on whether users of the *WhistleB*[®] Channel of the Nueva Pescanova Group identify themselves by name or choose to submit a Consultation or Complaint anonymously.
2. If users choose to identify themselves, the personal data required in the corresponding *WhistleB*[®] Consultation or Complaint form, such as first and last name, e-mail address and phone number, shall be processed. Besides, if third parties are identified by name in the Consultation or Complaint, their identities shall also be processed through this Channel.
3. Personal data are therefore collected through the form that users submit when using the *WhistleB*[®] channel of the Nueva Pescanova Group.

V. PURPOSE OF THE PROCESSING

All personal data and, in general, all personal information provided by the user shall be processed for the purpose of managing, investigating, and responding to the Consultations and Complaints submitted through *WhistleB*[®]. In this regard:

- a. Personal data that is not necessary for the knowledge and processing of Consultations and Complaints related to Compliance matters and individuals referred to in Article 5 of the Regulations of the Compliance Channel shall not be processed and will be immediately deleted, if applicable.
- b. All personal data that may have been communicated and that refers to behaviours not covered by the scope of the Regulations of the Compliance Channel shall be deleted.
- c. If a received Consultation or Complaint contains personal data falling within the special categories of data (i.e., data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data, data concerning health, or data concerning a person's sex life or sexual orientation), such data shall be immediately deleted without being registered or processed.
- d. Personal data that is found to be inaccurate or false shall be deleted as soon as such circumstances are known unless the inaccuracy or falsehood may constitute a criminal offense, in which case the information will be retained for the necessary duration during which the judicial proceedings are being conducted.

VI. BASIS OF LEGITIMACY FOR PROCESSING

The legal basis of legitimacy for the processing of personal data, in accordance with the mentioned purposes, are as follows: (i) Compliance with the legal obligation imposed on the Data Controller by articles 10 to 12 of *Law [Spanish] 2/2023, of February 20, regulating the protection of people who report on regulatory violations and the fight against corruption*; (ii) The legitimate interest of the Data Controller in ensuring legality and compliance by professionals within the Nueva Pescanova Group, suppliers, or any third party associated with the Group, regarding Our Code of Ethics, Supplier's Ethical and Social Charter, Corporate Policy for the Prevention of Criminal Risks, Our Anti-Corruption Code, or other internal corporate regulations; and (iii) The public interest when ensuring compliance with other legal provisions.

VII. STORAGE PERIOD

The personal data subject to processing will be stored in the internal information system of the Compliance Channel only for the necessary period to resolve the relevant Consultation or Complaint and, in any case, for

a maximum period of **three (3) months** from the date the personal data was obtained –unless an extension of the File duration is agreed upon for an **additional maximum period of three (3) months**– after which they will be deleted, unless the purpose of their retention is to provide evidence of the functioning of the Criminal Risks Prevention Program of the Nueva Pescanova Group or local crime prevention programs implemented in any of the countries where it operates. In such cases, they will be retained for a maximum period of **ten (10) years**. Communications received through *WhistleB*[®] that are not accepted for processing by the Compliance Unit will be stored in an anonymized manner without the need for prior blocking.

VIII. ACCESS AND COMMUNICATION OF PERSONAL DATA

1. The following individuals may have access to personal data contained in communications made through the *WhistleB*[®] tool:
 - a. Members of the Compliance Unit, other professionals from the Corporate Compliance Function, and, in the case of information related to a foreign subsidiary of the Nueva Pescanova Group, the Delegate of Compliance of that subsidiary.
 - b. Other professionals within the Group who, under confidentiality obligations, are entrusted by the Compliance Unit to conduct an internal investigation into the reported information (Case Instructors).
 - c. External professionals contracted by the Compliance Unit to carry out forensic investigations or obtain digital evidence, who will act as Data Processors under the appropriate data processing agreement.
 - d. Responsible personnel from the Human Resources Department of the Group, when the Compliance Unit has proposed in its Resolution the evaluation of possible disciplinary measures against an employee in accordance with applicable labour laws.
 - e. Responsible personnel from the Legal and Compliance Department of the Group, when the Compliance Unit has proposed in its Resolution the evaluation of possible legal actions in relation to the investigated facts.
 - f. The Data Protection Officer (DPO) (in the case of Group companies in Spain, the President of the Data Protection and Privacy Committee).
2. In any case, the processing of personal data by individuals other than those mentioned above, or even their disclosure to third parties, will be lawful when necessary for the adoption of corrective measures within the Group or the processing of potential sanctioning or criminal procedures, if applicable.

IX. INTERNATIONAL TRANSFER OF DATA

1. International transfers of personal data processed through *WhistleB*[®] are not foreseen.
2. Notwithstanding the foregoing, should the international transfer of the personal data undergoing processing be absolutely essential, such transfer should be carried out under one of the qualifying conditions set out for this purpose in the Chapter 5 of the **GDPR**, without prejudice to the applicability, where appropriate, of paragraph 1(d) of Article 49, when the international transfer of data is necessary for important reasons of public interest.

X. EXERCISE OF RIGHTS

1. *WhistleB*[®] users have the right to access to their processed personal data, as well as the right to request the rectification of inaccurate data or, where appropriate, to request its deletion when they are no longer necessary for the purposes for which they were collected. Users may also exercise their right to object or to limit the processing or portability regarding their personal data.

2. Users may submit requests to exercise their rights free of charge by contacting the Compliance Unit of the Nueva Pescanova Group via e-mail (unidad.cumplimiento@nuevapescanova.com or canal.cumplimiento@nuevapescanova.com) or by postal mail to the Compliance Unit to the registered office in Spain of **NUEVA PESCANOVA** indicated in Section II of this Policy.
3. Users also have the right to file claims for breach or failure to comply with the regulations on personal data protection before the Spanish Data Protection Agency through its website <https://sedeagpd.gob.es/sede-electronica-web/vistas/infoSede/tramitesCiudadano.jsf> or before any other supervisory authority that may be competent depending on the nationality of the data subject, the source of the processed data and any other link with said authority, in accordance with the applicable legislation.

XI. REPEALING PROVISION

This Privacy Policy of *WhistleB®* of the Compliance Channel of the Nueva Pescanova Group completely repeals the *Privacy Policy of the Compliance Channel of the Nueva Pescanova Group* approved by Agreement of the Compliance Channel on 5 June 2018.

XII. APPROVAL, AMENDMENT, ENTRY INTO EFFECT AND DURATION

1. The first version of this Privacy was approved by the Compliance Unit in its meeting held on September 30, 2022, and became effective and enforceable from that day onwards.
2. Any modification to this Policy must be agreed upon by the Compliance Unit.
3. The current version at any given time will be the one recorded as the latest approved by the Compliance Unit in the "Control of amendments" section below.

XIII. CONTROL OF AMENDMENTS

Version	Summary of amendments	Promoter of amendments	Amendment approval body	Amendment approval date
v_1	Initial approval of the Privacy Policy of <i>WhistleB®</i> of the Nueva Pescanova Group.	Director of the Compliance Unit	Compliance Unit	09/30/2022
v_2	Adaptation of the Privacy Policy of <i>WhistleB®</i> of the Nueva Pescanova Group to Law [Spanish] 2/2023, of February 20, regulating the protection of people who report on regulatory violations and the fight against corruption.	Director of the Compliance Unit	Compliance Unit	08/01/2023

CONTACT

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Access to the WhistleB® channel of the Nueva Pescanova Group:

<https://report.whistleb.com/nuevapescanova>

Compliance Unit: unidad.cumplimiento@nuevapescanova.com

Compliance Channel: canal.cumplimiento@nuevapescanova.com

