



# *Third data subjects Privacy Policy*

Telefónica, S.A. and companies under the  
Telefónica Group's global perimeter companies

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## 1. Introduction and scope of this privacy policy

*The purpose of this privacy policy (hereinafter, the "Privacy Policy") is to provide information regarding the processing of their personal data to all identified or identifiable natural persons who, in their capacity as "Data Subject/s", have a relationship for the provision of services other than employment, collaboration, dialogue, or maintain contact for any other reason, with Telefónica, S.A. or any other entity belonging to or related to the Telefónica Group under the global perimeter listed in the Annex to this Privacy Policy (hereinafter, "Telefónica").*

*This Privacy Policy contains details of the purposes for which Telefónica processes the personal data of the different categories of Data Subjects, which will vary according to the nature of the relationship maintained with Telefónica.*

*Without limitation, the following categories of Stakeholders are considered within the scope of this Privacy Policy:*

- *External/outside personnel: those individuals who have an employment or other relationship with a legal entity or with a professional who provides services to Telefónica or who, due to any other circumstance in which, because of their duties, need access to Telefónica systems, tools, applications, internal networks, installations, environments or buildings. For example: installers, trainees or interns, staff of suppliers or consultants, staff providing training or lectures, auditors, inspectors, external collaborators or any others who could be considered as falling within this category.*
- *Third-party person who maintains a relationship with a Telefónica employee with whom there could potentially be a conflict of interest.*
- *Suppliers, freelancers or professionals who are natural persons: those natural persons who maintain a direct or indirect relationship of provision*

*or receipt of services with Telefónica and whose processing of personal data is necessary to maintain and execute such a relationship.*

- *Signatories, legal representatives, attorneys-in-fact and other professional contact persons of counterparties: are those natural persons related to a legal person or to a professional who has a direct or indirect relationship with Telefónica and whose processing of personal data is necessary to maintain and execute such relationship and, in particular, to be included in agreements, contracts or any other legal documentation that needs to be signed with Telefónica, as well as to maintain the negotiation prior to the signing thereof.*
- *Any other type of interlocutors.*
- *Guests and visitors to the facilities and physical and digital environments under the responsibility of Telefónica.*

*This Privacy Policy also provides information on the global processing carried out by Telefónica, S.A., as the parent company of the Telefónica Group, with respect to the personal data of stakeholders that it carries out on a global basis, as well as the rights they have in this respect.*

*This Privacy Policy has been prepared without prejudice to any information that may be offered to the stakeholder through other specific data protection clauses or privacy notices in any Telefónica documents, forms, notices, systems and/or platforms.*

*In this regard, Telefónica informs that the personal data of the data subjects will be processed in accordance with the principles of transparency, purpose restriction, data minimisation, accuracy, integrity and confidentiality, as well as respecting all the obligations and guarantees established in the European Regulation (EU) 2016/679, of 27 April 2016, General Data Protection, in the Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of*

*Digital Rights, and in the rest of the special regulations governing the protection of personal data.*

*Thus, in order to comply with the aforementioned regulations and to help to understand how the personal data of the data subjects is collected, used, processed and protected, Telefónica has this Privacy Policy, informing of the following aspects related to the right to the protection of personal data.*

## 2. Who processes your data?

*For the purposes of this Privacy Policy, it is the Telefónica Group company within the global perimeter that, as the case may be, interacts directly or indirectly with the Data Subject, being the cause of the processing of his or her personal data, whether as a recipient of services, a contracting party or a party in contact with the Data Subject, or as the party responsible for the facilities, both physical and digital, to which the Data Subject has access, that determines the purposes and means of the personal data of the Data Subjects, in its capacity as "Data Controller". Telefónica, as the data controller responsible for the processing of their personal data, will process them for the purposes set out in this Privacy Policy. The Data Subject may find in the Annex to this Privacy Policy details of the name and contact details of the respective Telefónica Group company within the global perimeter with which he/she interacts, together with details of the contact address of Telefónica's Data Protection Officer, who is the person responsible for ensuring the protection of the fundamental right to the protection of the personal data of the Data Subject. To contact Telefónica's Data Protection Officer, the Data Subject may write to the address that appears in Annex I, depending on the company responsible for the processing in question.*

*In addition, data subjects are informed that Telefónica, S.A. may also process personal data for all those processing operations that have a global purpose, as described in this Privacy Policy.*

### 3. What is personal data and what personal data does Telefónica process?

*Personal data is any information relating to an identified or identifiable natural person. In this regard, an identifiable natural person is understood as any person who can be identified, directly or indirectly, by an identifier such as a name, an identification number, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

*Depending on the circumstances that apply, Telefónica processes the personal data provided directly by the Data Subject, those provided by third parties and those that are generated subsequently during the development of the relationship with Telefónica, always under the protection of a basis that legitimises such access to the information and only when applicable as detailed in this Privacy Policy and in accordance with the requirements of data protection regulations. Based on the principle of data minimisation, the personal data that Telefónica processes are appropriate, relevant and limited to that which is necessary for the purposes for which they are processed.*

*The personal data processed may vary depending on the type of Data Subject and the service or relationship that he/she maintains with Telefónica directly or through his/her company, where applicable, as well as on the specific nature of the relationship that links him/her to Telefónica. However, in general terms, the personal data processed by Telefónica include the following categories of data according to the method by which they are obtained:*

#### **3.1 Personal data obtained directly from the data subject:**

*Personal data provided by the Data Subject to Telefónica in order to process the dialogue, fill in or sign the documentation necessary to maintain and execute the relationship, or for access to the various systems,*

tools or buildings. These would mainly be basic identification and contact details such as forename, surname, address, email address, telephone number, ID card number or similar, etc.

### **3.2 Personal data not obtained directly from the Data Subject:**

*This is personal data relating to the Data Subject that has not been directly provided by the Data Subject to Telefónica, but which have been generated as a result of the relationship maintained or as a result of the use of Telefónica's systems, applications, networks, physical or digital accesses, physical and digital spaces, or have been provided by the collaborating company or by the company with which Telefónica has a contractual relationship or data provided by employees. Similarly, depending on the circumstances and nature of the relationship established, Telefónica may also obtain them from other external and/or publicly available sources.*

*These categories of personal data include the following:*

- *Identifying information: it is personal information which enables the data subject to be uniquely identified. This includes, for example, forename and surname, DNI/NIE/Passport number or photograph, internally assigned identifier for access to facilities, systems, etc., e-mail, proxy data and/or signature.*
- *Information of a professional nature and on the performance of the functions carried out: this is personal information relating to the job position, functions performed at Telefónica, information relating to work experience, official training, projects, reports on functions performed and their evaluation, knowledge or skills profile, languages and certifications of the Data Subject that may have been provided directly or through their employing company and the activity of the Data Subject that is requested from their company to enable the evaluation of the professional profile in the functions*

contracted to their company, as well as all necessary documentation within the framework of the Coordination of Business Activities (CAE, in its Spanish initials) to enable Telefónica to verify its obligations, for example in the verification of tendering processes or occupational risk prevention relating to personal information provided by the Data Subject within the framework of accident investigation and documentation, as required by current legislation.

- Information related to the control and registration of access to facilities: in areas where access control and registration mechanisms are installed, the personal data that may be processed in this context, either by Telefónica and/or by another Telefónica Group company managing the relevant facility or building, include, for example, identification data and credentials of the Data Subject and/or his/her vehicle, the date and time of access and exit from a particular facility, or the location of the facility where the Data Subject is located, has accessed or has exited.
- Information obtained from video-surveillance devices, and, where applicable, biometric access control devices and/or thermographic body temperature detection systems: in areas that are captured by video-surveillance and/or biometric recognition devices, the personal data that may be processed in this context may include, for example, the Data Subject's image and voice, biometric data, thermographic data and the date and time of the capture of such data.
- Information derived from the use of Telefónica's corporate networks, systems, platforms and devices: this is information derived from the activities derived from the use of corporate resources, systems, networks, platforms and means that are made available to the Data Subject who needs it for the performance of their

functions, as well as the data and information associated with the Internet connection, the operations carried out on the systems, email, the identification of the computer and/or telephone assigned, if applicable, for the performance of such functions.

- Credentials and identifiers of the Data Subject: these are the unique identifiers assigned in the various corporate tools and systems that the Data Subject may need, such as user name or e-mail, access cards, access credentials and similar that Telefónica generates to uniquely identify the Data Subject in Telefónica's information systems and that will allow them to authenticate themselves and use such systems. Telefónica will provide the Data Subject's credentials in all those information systems, both its own and those of third parties, that it considers necessary for the correct execution of the activities entrusted to the Data Subject within the framework of the relationship established.

## 4. Why does Telefónica process personal data?

Telefónica processes the personal data of the Data Subject for the purposes indicated below and in accordance with the legitimate bases applicable to each of them.

### 4.1 Compliance with legal obligations in labour and occupational risk prevention matters

In compliance with the requirements established in current labour and occupational risk prevention legislation, it may be necessary for Telefónica to process personal data of an identifying nature, as well as employment details, relating to all those interested parties who visit and/or carry out their professional activity in facilities for which Telefónica is responsible or outside them, provided that they are related to the provision of the service contracted from your company. In addition, and solely to the extent that is



*strictly necessary to comply with the legal obligations of Telefónica, as the data controller, in the sphere of labour law and social security and protection, to the extent authorised by the regulations in force on the prevention of occupational risks. These personal data will only be processed by a very limited number of persons authorised by Telefónica and under the strictest duty of confidentiality, and will not be processed by Telefónica for any other purpose, nor disclosed to third parties except in the cases provided for in this Privacy Policy. In addition, on a very specific basis, it may be necessary to process specially protected data, such as data relating to the health of the data subject, for example, in cases of occupational accidents occurring in the course of the duties performed at Telefónica, which are deemed necessary to process for the purposes of taking the appropriate steps with the competent authorities.*

#### **4.2 Access control, time and attendance, security and video-surveillance**

*In satisfaction of Telefónica's legitimate interests in ensuring the physical and digital security of its sites, facilities, environments and the like, presence control for compliance with contractual obligations, Telefónica will process the Data Subject's personal data to manage automated or manual access controls to such locations; maintain and use a system of cameras or video cameras at such locations to maintain their security, as well as that of the people and property located there; carry out investigations and resolution of security incidents and fraud occurring in such places; cooperate with judicial or administrative or insurance requirements; plan actions related to the use and management of such places; issue and manage access cards and other access credentials, and carry out other similar activities for such purpose.*

### **4.3 Participation in training actions and quality surveys/studies**

*On the basis of Telefónica's legitimate interest in providing training to Data Subjects, when this may be necessary in accordance with its activity and the nature of the relationship maintained, as well as to ascertain the satisfaction of Data Subjects in the performance of their activity that will enable Telefónica to improve the quality of its future processes and the relationships it establishes and to assess the effectiveness or suitability of the different actions carried out with Data Subjects, Telefónica may process the personal data of Data Subjects in order to make available and provide access to various platforms with training and gamification actions related to the exercise of their functions, with aspects related to Telefónica's security regulations that must be complied with by the Data Subject, or any other that may be considered appropriate; send and carry out surveys with aggregate results to said Data Subjects; carry out aggregate studies on the use of said training actions; and record the training sessions in which they participate, always with their prior knowledge, for the dissemination of the training activities in internal or external media, among other related activities.*

### **4.4 Access and security management of systems, networks, digital assets and platforms required for the performance of functions**

*Based on Telefónica's legitimate interest in providing and ensuring the security and integrity of the systems, networks, assets and digital platforms necessary for the best performance of the functions entrusted to the Data Subject, such as office, email and instant communication systems, cloud storage, software design and development, intranets and contact directories, Telefónica may create and manage an account if necessary for the Data Subject to access and use certain systems; process personal data relating to the tools, devices and technical means it makes available to the Data Subject, including the detection and response to events and incidents that affect or could affect the security of*

*networks, systems, assets and similar facilities; monitor the Data Subject's use of the tools, devices and technical means, as well as the security logs generated by such use; and to carry out investigation and forensic analysis activities related to such use, all in accordance with compliance with the law and Telefónica's internal corporate rules governing their use and, in all cases, in accordance with criteria of proportionality and data minimisation.*

#### **4.5 Fraud prevention**

*On the basis of Telefónica's legitimate interest in anticipating and protecting itself against fraud and irregular practices that may cause it harm or damage of any kind, Telefónica may process the personal data of Data Subjects in order to carry out the appropriate preliminary or subsequent investigations into possible irregular or fraudulent practices; implement alerts and due diligence control and analysis tools in the systems and similar made available to the Data Subjects, as well as in the processes related to purchase requests, contracting, installation, logistical shipments of devices, detection of irregular or fraudulent consumption and any other management that may be carried out from Telefónica's anti-fraud tools, taking into account, in all cases, criteria of lawfulness, proportionality, suitability and minimisation of data.*

#### **4.6 Custody or conservation of signed or legally binding documentation**

*Based on Telefónica's legitimate interest in maintaining its repository of signed documentation with counterparties or any other documentation that is legally binding or legally required to be kept in full and secure form, Telefónica will process the personal data of the Data Subjects contained in such documentation for the sole purpose of safekeeping and duly conserving it in a manual, automated or mixed manner, for the entire period of time that legally binds the counterparties to such documentation, as required by the different regulations applicable to such documentation, or for the entire statute of limitations period for such documentation, or for the entire statute of*

*limitations period for such documentation, automated or mixed, for the entire period that legally binds the counterparties to such documentation, that is required by the different regulations applicable to such documentation, or for the entire period of limitation of the actions arising from the aforementioned regulations. If deemed necessary for the exercise and defence of Telefónica's rights and interests, it may be shared with the Data Subject's employer, lawyers, public bodies, court representatives, judges or competent courts, consultants and/or auditors.*

#### **4.7 Maintenance and implementation of the established relationship**

*Likewise, on the basis of the legitimate interest of Telefónica as the contractual partner in maintaining and executing the established relationship, the contact data of the Data Subject may be processed in order to carry out the professional contact necessary to satisfy said interest and for the purpose of achieving objectives or purposes that are of interest to all parties.*

#### **4.8 Anonymisation of personal data**

*Telefónica's legitimate interest in processing non-personal information for different purposes, thus diminishing the impact on the right to the protection of personal data of the Data Subjects, is also the basis for duly anonymising the personal data of such Data Subjects and/or aggregating those personal data obtained through the aforementioned studies, or from the use or interaction of the Data Subject with Telefónica's systems and platforms, or that already exist in such systems and platforms for processing for the purposes informed in this Privacy Policy. The aforementioned anonymisation process shall be carried out in such a way that the resulting information does not reasonably allow the process to be reversed and the data subject to be identified or associated with any specific natural person, complying with the guarantees required by law and always abiding by the criteria of reasonableness and proportionality.*

#### **4.9 Conducting internal and external audits, certification and verification processes and internal control.**

*Telefónica has a demanding internal control system that requires internal and external audits, as well as processes for obtaining certifications and verifications for compliance with internal regulations and contractual and legal obligations.*

*The performance of these activities may require the processing of certain categories of personal data of data subjects based on Telefónica's legitimate interest in maintaining high standards of compliance and control as well as on applicable legal obligations.*

#### **4.10 Response to requests from authorities, collaboration with other bodies and regulators, and the exercise of rights in various procedures and compliance with legal obligations**

*Telefónica is subject to various legal obligations that require it to process certain categories of personal data in order to comply with these obligations. These obligations are heterogeneous in nature and are required, primarily and without limitation, by the applicable labour, social security, tax, social protection and occupational risk prevention legislation.*

*It will be necessary to process identification data, to the extent strictly necessary to fulfil this purpose in order to comply with the aforementioned legal obligations. This includes, for example:*

- *Compliance with inspections by authorities and other requests from public or regulatory bodies,*
- *Response to legal proceedings and the possible defence thereof, requests from authorities, exercise, defence and response to rights, all in accordance with Telefónica's operations, policies and procedures associated with the fulfilment of these legal obligations.*

#### **4.11 Performance of collaborative activities, events, competitions and raffles**

*Telefónica may, from time to time, provide Data Subjects with the option to voluntarily participate in collaborative activities, events, contests or prize draws organised by Telefónica.*

*In those cases in which the Data Subject freely decides to participate in the aforementioned activities, the processing of the data that is necessary for the management of the request made by the Data Subject and of the activity itself, as well as any other data that the Data Subject voluntarily provides in the framework of the dissemination of the activity in internal or external networks of the Telefónica Group, shall be based on the consent of the Data Subject freely given in each case, and the terms and conditions of the activity or benefit defined by the person responsible for the activity may be applicable.*

## **5. Information retention periods**

*In compliance with the principle of limitation of the retention period set out in the data protection regulations, the personal data of Data Subjects obtained will be processed solely and exclusively for the time necessary and for the purposes for which they have been collected at any given time. Accordingly, Telefónica has established the following retention periods and criteria that will be applicable depending on the purpose and the legitimate basis that applies to each processing operation, unless in any specific clause Telefónica has specified a period different to that established in this Privacy Policy, in which case the period indicated in that specific clause will prevail:*

- *All personal data relating to the Data Subject that Telefónica processes for the purpose of ensuring the correct performance of the contractual employment relationship it has entered into with the Data Subject will be*

*processed for as long as the aforementioned contractual relationship entered into between both parties remains in effect.*

- Personal data captured by video surveillance systems shall be retained for a maximum period of 30 days from the time the data are obtained, except in cases where activity is detected that needs to be investigated, in which case the data shall be retained for the duration of the investigation.*
- The personal data of Data Subjects obtained through the access control systems will be processed for a period not exceeding 5 years from the date of collection,*
- The personal data that Telefónica processes for the fulfilment of legal obligations will be processed in accordance with the time period determined in each case by the regulations requiring the processing.*
- Any other personal data processed by Telefónica that does not fall within the above-mentioned categories will be processed only for as long as it is strictly necessary to fulfil the purpose for which it was processed.*

*Without prejudice to the foregoing, when the contractual relationship between the Data Subject and Telefónica ends, or when the purpose for which the data were originally collected is fulfilled, the data will be kept by Telefónica duly restricted for the additional period necessary to meet the liabilities arising from the processing of such data, remaining at the disposal of Public Administration agencies, the Public Prosecutor's Office and competent judges and courts for the purpose of fulfilling any legal obligations that may apply, for the exercise of its responsibilities or for the exercise or defence of claims. As soon as such obligations or claims have lapsed, the personal data will be deleted from Telefónica's systems.*

*Finally, Telefónica recalls that it may subsequently anonymise such data so that they cannot be related to the data subject, complying with all the guarantees*

required by law under parameters of reasonableness and proportionality, for the purpose of carrying out internal studies and analyses.

## 6. Exercise of rights

In accordance with the provisions of the applicable data protection legislation, and in relation to the processing mentioned in this Privacy Policy, Telefónica informs the Data Subject that they have the following rights recognised by data protection legislation:

- *The right to access their personal data to find out what personal data Telefónica is processing concerning them.*
- *Data subjects may request the rectification of any inaccurate or out-of-date personal data.*
- *Data subjects may request the deletion of their data when, for example, the data is no longer necessary for the purposes for which it was collected. In this regard, Telefónica informs the Data Subject that, upon a request for erasure, personal data may be placed in a blocked status prior to erasure, which means that the data will be stored by Telefónica for as long as a liability may arise in respect of the processing thereof, for the sole purpose of being able to demonstrate compliance with its legal and contractual obligations, and only for as long as such liabilities may be enforceable in light of the applicable statute of limitations.*
- *Data subjects may request the limitation of the processing of some of their data, in which case, if applicable, Telefónica will only retain them for the purpose of exercising or defending claims.*
- *Data subjects may request to object to the processing of some of their data for certain purposes based on Telefónica's legitimate interest.*
- *Where Telefónica has obtained the consent to the processing of his or her personal data in any context, the data subject may withdraw such consent at any time.*



- *The data subject has the right to request the portability of their personal data in a structured, commonly used, machine-readable and interoperable format, where the processing is carried out by automated means and for certain purposes.*
- *The Data Subject also has the right not to be subject to automated individual decisions based solely on the processing of their personal data, including profiling, which produce legal effects on them or significantly affect them in a similar way.*

*The Data Subject can exercise these rights by contacting [privacidad.web@telefonica.com](mailto:privacidad.web@telefonica.com). Any exercise of rights will be responded to, as appropriate, within one month, which may be extended by two months if necessary, taking into account the complexity of the exercise and the number of requests received. Telefónica may request from a Data Subject who has exercised the right, additional information that, in each case, is necessary to ensure the identity or for the correct satisfaction of the right exercised.*

*In any case, the Telefónica Data Protection Officer is available to Data Subjects at the address shown in Appendix I, depending on which company is the data controller in question.*

*In the event that the Data Subject is not satisfied in the exercise of his or her rights, he or she may file a complaint with the competent data protection authority (in the case of Spain, the Spanish Data Protection Agency -AEPD-).*

## **7. Recipients or categories of recipients**

*Telefónica will only disclose Data Subjects' personal data to third party recipients who receive it for processing as data controllers and who are duly authorised for the purposes set out in this Privacy Policy, in order to maintain the contractual relationship, comply with its legal obligations and satisfy its legitimate interests in the terms set out below:*

## 7.1 Data communication to Telefónica Group companies

*Due to the business configuration of the Telefónica Group, and in accordance with the legitimate interest of Telefónica, S.A. to be able to manage efficiently, certain processing of personal data will be carried out globally by the parent company of the group, Telefónica, S.A., including, but not limited to, the management of the services of the facilities located in Distrito Telefónica, the sending of certain global communications, the management of the Telefónica Group's corporate social networks as well as the global management of the security of the Group's networks and regulatory control and/or compliance, participation in global surveys and materiality studies or any others that may be necessary to comply with a legal obligation.*

*Any Telefónica Group Company may communicate the personal data it collects from Data Subjects included in this Privacy Policy to Telefónica, S.A., solely for the purposes described, in order to fulfil the purposes indicated in this section. Data Subjects may obtain further information regarding the processing of personal data under the responsibility of Telefónica, S.A. as set forth in this Privacy Policy and in the privacy or data protection notices presented in each case, such as those included in the platforms, systems or tools managed by Telefónica, S.A.*

*Moreover, other Telefónica Group Company Employees and Data Subjects may be able to access their information on a limited basis, such as their identification data, corporate email address, corporate telephone number, job position, their department and/or supervisor, through the use of collaboration and social networking tools made available to them. This communication of data takes place on the basis of Telefónica's legitimate interest so that the necessary communications can be implemented and improved for the correct performance of the professional duties of its employees.*

*In addition, there is the possibility of transferring access control data to the Telefónica company where the services are provided for the purpose of supervising compliant with contractual obligations.*

## **7.2 Data communication to financial, banking or payment institutions**

*For the purpose of fulfilling the payment obligations arising from the contract relationship, as well as for the fulfilment of Telefónica's legal obligations in the labour and tax spheres, identification data and payment data may be communicated to the relevant banking or financial institutions as identified by the Data Subject, solely to the extent necessary for the fulfilment of the aforementioned purposes.*

## **7.3 Communication of data to external auditors**

*In order to comply with the various technical, financial or non-financial auditing obligations, as well as processes arising from legal or contractual obligations, certifications or verifications, personal data may be disclosed to external auditors occasionally and solely to the extent necessary for the fulfilment of the aforementioned purposes.*

## **7.4 Data communication to authorities, administration agencies or other competent public bodies**

*Where Telefónica is legally obliged to do so, it may be necessary to disclose personal data to authorities, administration agencies or other public bodies in the exercise of their powers, such as courts of law and other legal bodies, customs, tax, labour or social security bodies.*

*Likewise, and only when necessary for the judicial or administrative exercise or defence of the rights granted to Telefónica by current legislation, the aforementioned personal data may be communicated to security forces and*

bodies, law firms, solicitors, administrative authorities, judges and competent courts.

### **7.5 Disclosures of data to Business Customers and to other contracting bodies or contractors of Telefónica within the context of contractual relations, tenders or bids**

*In accordance with Telefónica's legitimate interest in being able to properly conduct its business activity, it is possible that identification data (e.g. name and ID card number), curriculum information (e.g. qualifications, previous professional experience), or information on Social Security contributions (e.g. Form TC2) of the Data Subjects must be transferred to third party Business Customers or other contractors in the context of contractual relations, tenders or bids submitted by Telefónica, for the sole purpose of the Business Customer or other contractor carrying out the corresponding evaluations (i) both of the professional proposal offered by Telefónica (ii) and, if applicable, by itself or through the services of third parties, eventually, by itself or through external due diligence services, those resulting from the application of its own internal regulations or procedures (in relation, in turn, to the detection of possible contingencies or fraudulent situations, application of money laundering regulations, etc.), in accordance with the legitimate interest that may correspond to it to process such data transferred by Telefónica (or, where appropriate, legitimately obtained through other sources); and all of the foregoing in order for Telefónica to be awarded the services subject to contracting, tender or competition, as well as when this is essential for the provision of the service that, where appropriate, has been awarded to Telefónica and/or to allow access to its facilities for security reasons.*

*Furthermore, within the context of contractual relationships that have been or will be established by Telefónica with a contracting party or contractor that is a natural or legal person, Corporate Customer, supplier or collaborator, and*

*in which the Data Subject is involved or participates on the basis of his or her professional duties, as a contact person of Telefónica, representative or authorised signatory, the contractual counterparty may receive from Telefónica the minimum necessary personal identification and professional location data of the Data Subject concerned, in order to satisfy the legitimate interest of the receiving counterparty for the execution and control of the relationship established with Telefónica.*

*In such cases, these third parties must ensure that they do not use the information for any purpose other than that for which it was communicated, guaranteeing the security of the information shared and always complying with the principles of proportionality and data minimisation.*

#### **7.6 Data communications in connection with the performance of certain commercial transactions:**

*Telefónica may, from time to time, disclose to third parties, whether third parties or Telefónica Group companies, the personal data of Data Subjects in the context of any transaction involving the restructuring of companies or the contribution or transfer of a business or branch of business activity affecting Telefónica, provided that such disclosure is necessary for the successful completion of the transaction and to ensure, where appropriate, the continuity of the service provision. In any event, if the operation is not concluded, the third party transferee shall immediately delete the data.*

## **8. Processing by suppliers and providers on behalf of Telefónica**

*Telefónica informs the Data Subject that it may make use of suppliers and providers for the purposes set out in this Privacy Policy, such as, for example, internet service providers, data hosting and technical support providers, e-mail providers, general service providers, physical security service providers, etc.*

*These suppliers and providers, whether third parties or Telefónica Group companies, will process personal data in the name and on behalf of Telefónica, as data processors, having previously signed a data processing agreement with Telefónica, under the terms required by the applicable personal data protection regulations. Pursuant to the said agreement, the data processors may only process the personal data for the provision of the service entrusted to them by Telefónica, and may not use it for any other purpose of their own or share it with any third party. In addition, these providers are subject to strict confidentiality obligations and are required to implement robust security measures to protect personal data in accordance with Telefónica's security standards.*

## 9. International data transfers

*Where suppliers or providers acting on behalf of Telefónica or where the recipients of personal data referred to in this Privacy Policy are located or process data outside the European Economic Area, Telefónica will be making an international transfer of the Data Subject's personal data. Countries outside the European Economic Area may not offer a level of data protection comparable to that of the European Economic Area. In such cases, Telefónica will ensure that the data processing carried out is subject to the highest standards of security and protection and to the technical, contractual and organisational guarantees required by data protection regulations.*

## 10. Security and confidentiality when processing information

*Telefónica is concerned about guaranteeing the security, secrecy and confidentiality of personal data. Therefore, as part of its commitment and in compliance with current legislation, Telefónica has adopted security measures and appropriate technical means to prevent their loss, misuse or unauthorised access. When personal data of Telefónica Group Data Subjects is processed,*

*specific procedures and security features are used to prevent unauthorised access.*

*The personal data will be treated with absolute confidentiality, and Telefónica undertakes to keep them secret and to guarantee its duty to safeguard them by taking the appropriate measures to prevent their alteration, loss and unauthorised processing or access, in accordance with the provisions of the applicable legislation.*

*In cases of personal data security breaches that pose a risk to the rights of individuals, Telefónica will take the necessary measures to remedy the situation and mitigate the possible negative effects that such a breach may have caused. It shall also notify the Data Subjects of the Telefónica Group and the competent supervisory authority when required to do so by the applicable data protection regulations.*

## **11. Processing for purposes not included in this Privacy Policy**

*If Telefónica requires the processing of the personal data of a Telefónica Group Data Subject for a purpose not covered by this Privacy Policy, the Data Subject will be expressly informed of this, with all legally required information, including the intended purposes of such processing, either through an update of this Privacy Policy under the terms set out in this document, or through specific data protection notices or clauses where necessary.*

## **12. Processing of data of other natural persons**

*In the event that the Data Subject provides personal data of third parties with whom Telefónica does not have a direct contractual relationship, the Data Subject will warrant as to the accuracy and suitability of the personal information provided, and undertakes to inform the data subjects that Telefónica will process their data*

in accordance with the provisions set forth in this Privacy Policy and/or, where applicable, the specific applicable clauses, providing them with a copy thereof, should they so request.

## 13. Processing for global purposes

Telefónica, S.A. (with Tax Identification Number A28015865 and registered office at calle Gran Vía 28, 28013, Madrid, Spain), as the head or parent company of the Telefónica Group and based on its legitimate interest in improving efficiency and productivity, in managing the internal communications of its corporate Group, in ensuring the digital security of its networks and corporate assets and the physical security of people and their locations, and in maintaining compliance with corporate rules and policies, carries out, as a data controller independent from the rest of the companies or subsidiaries of its Group, certain processing of Telefónica Group Data Subjects' data.

As explained in this Policy, such data may be received from the different employer companies of the Telefónica Group, on the basis of the aforementioned legitimate interest of Telefónica, and may also be collected from the Data Subjects themselves when they interact with Telefónica, S.A. or use the systems and platforms provided directly by Telefónica, S.A. Their processing is carried out for Telefónica, S.A.'s own global purposes in the initiatives carried out from the different global divisions and departments it leads, and, specifically, the following:

### 13.1 Purposes realised in the sphere of corporate communication

The global Communication Department may use the data for corporate communications that are deemed relevant and of interest for the Telefónica Group Data Subjects, as well as to facilitate the use of Telefónica's systems and platforms, including collaborative tools and the corporate social network managed by said global department.



### **13.2 Purposes carried out in the field of corporate security**

*The global security department processes information with the aim of managing and improving digital security, implementing surveillance in networks and systems, as well as anticipating and, where appropriate, coordinating the handling, together with the competent departments, of incidents and forensic analyses of events and hacks that could jeopardise the confidentiality, integrity and availability of the Telefónica Group's systems and the information contained therein. In addition, information could be processed to act and centrally manage a physical or digital security crisis that puts the security of Telefónica Group or Telefónica Group systems and platforms at risk. The global Security area may also process the data collected by the video surveillance and access control systems installed in the buildings under the responsibility of Telefónica, S.A., such as, for example, Telefónica District, with the aim of guaranteeing the security of the goods and people located there.*

### **13.3 Purposes carried out in the sphere of corporate compliance and auditing**

*The global Compliance and Internal Audit Department verifies compliance with processes related to the corporate rules and policies defined by the Group, technology and the cybersecurity of the Group's systems and platforms, as well as the processing and resolution of certain internal investigations, opened ex officio or as a result of complaints, regarding irregularities in this regard. Also, from the Global Compliance area, we develop purposes related to internal regulatory compliance processes related to Hospitality and Conflicts of Interest,*

#### **13.4 Purposes carried out in the sphere of general corporate services**

*The General Services Department processes data of Data Subjects who interact with the Telefónica Group and who carry out their activity in work centres in order to manage the services available in the facilities and buildings located there (for example, in the Telefónica District complex in Madrid), with the aim of better managing the space and facilities.*

#### **13.5 Purposes realised in the sphere of sustainability and corporate social responsibility**

*In the Global Sustainability Department for participation in global surveys and materiality studies or any others that may be necessary to comply with a legal obligation.*

*Furthermore, Telefónica S.A. informs that the reasons or legal bases expressed in this Privacy Policy may be, where appropriate, applicable to the global purposes reported in this section when the purposes pursued are similar.*

*In addition, with respect to the data retention period, the recipients, the exercise of rights, and other relevant information for the Data Subjects in the processing of their data by Telefónica, S.A. for global purposes, the provisions of each applicable section of this Privacy Policy for local purposes shall also apply to the global purposes of this section.*

*Any new processing operations for global purposes that are identified will be incorporated into this Privacy Policy in accordance with the provisions set forth herein.*

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## 14. Term and changes to the Privacy Policy

*This Policy shall remain in force indefinitely from the time of its initial publication or any updates. Telefónica may update this Privacy Policy at any time when it is considered necessary or useful to adapt it to the new requirements of the applicable data protection regulations, to extend the processing of the data reported herein due to a change in any of the relevant points informed and/or for any other legitimate reason. The said update will be made public by Telefónica in any case and sufficiently in advance of its entry into force, by publishing it and making it available through the channels set up for this purpose.*

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## ANNEX

List of Telefónica Group companies under the global scope:

<u>Company</u>	<u>Tax reference</u>	<u>Postal address</u>	<u>DPO Contact</u>
Telefónica, S.A.	A28015865	Gran Vía 28, 28013 Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Infra, S.L.	B88584925	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Tech, S.L.	B78529724	Gran Vía 28, 28013 Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Cybersecurity & Cloud Tech, S.L.	B01636760	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Finanzas, S.A.U.	A28639169	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Gestión Integral de Edificios y Servicios, S.L.U.	B86471802	Gran Vía 28, 28013 Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Compras Electrónicas, S.L.	B85284594	Gran Vía 28, 28013 Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Global Solutions, S.L.U.	B85627792	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica IoT & Big Data Tech, S.A.	A78967577	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Open Innovation, S.L.	B86230562	Ronda de la Comunicación SN – Distrito Telefónica,	DPO_Telefonicasa@telefonica.com

		28050, Madrid, Spain	
Telefónica Hispanoamérica, S.A.U.	A86854684	Ronda de la Comunicación SN – m Distrito Telefónica, 28050, Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Soluciones de Criptografía, S.A.	A87050423	Gran Vía 28, 28013 Madrid, Spain	DPO_Telefonicasa@telefonica.com
Telefónica Seguros y Reaseguros Compañía Aseguradora, SAU	A05362645	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, España	delegadodeprotecciondedatos.telefonicaseguros@telefonica.com
Telefónica Seguros y Reaseguros Compañía Aseguradora, SAU Direktion für Deutschland	DE285165147	Georg-Brauchle-Ring 50, 80992 Múnich	delegadodeprotecciondedatos.telefonicaseguros@telefonica.com
Telefónica Insurance, S.A. UK BRANCH	BR014757	120 New Cavendish Street, London, W1W 6XX	delegadodeprotecciondedatos.telefonicaseguros@telefonica.com
Reaseguradora Nova Casiopea RE, S.A.	BE158616	23 Avenue Monterrey L-2163 Luxembourg	delegadodeprotecciondedatos.telefonicaseguros@telefonica.com
Telefónica Correduría de Seguros y Reaseguros Compañía de Mediación, S.A.	A80157795	Ronda de la Comunicación SN – Distrito Telefónica, 28050, Madrid, España	delegadodeprotecciondedatos.telefonicaseguros@telefonica.com
Telefónica Digital Limited	07884976	120 New Cavendish Street London W1W 6XX	DPO_Telefonicasa@telefonica.com
Telefónica Europe B.V.	NL805410247B01	Zuidplein 112, WTC Tower H Floor 13 - 1077XV AMSTERDAM	DPO_Telefonicasa@telefonica.com

Telfisa Global B.V.	NL8174.04.612.B 01	Zuidplein 112, WTC Tower H Floor 13 - 1077XV AMSTERDAM	DPO_Telefonicasa@telefonica.com
FONDITEL PENSIONES, E.G.F. P. .S.A	A80416332	Ronda de la Comunicación SN Distrito Telefónica, 28050, Madrid, España	protecciondedatos@fonditel.es
FONDITEL GESTIÓN S.G.I.I.C S.A.U.	A83632638	Ronda de la Comunicación SN Distrito Telefónica, 28050, Madrid, España	protecciondedatos@fonditel.es
Telefónica Innovación Digital, S.L.	B83188953	Ronda de la Comunicación SN (Edificio Central)Distrito Telefónica, 28050, Madrid, España	DPO_Telefonicasa@telefonica.com



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