

MANGO

## General Privacy Policy

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## 1. Introduction

Personal data is not only a necessary asset but also a strategic one for the business development of the MANGO Group. For this reason, the MANGO Group is committed to strictly complying with all the duties and guarantees established in the current regulations on the protection of personal data that, where applicable, may be applicable to it.

The purpose of this policy is to establish the basic guidelines and principles that ensure, among others, the confidentiality, integrity, availability, accuracy, legality and transparency of the personal data of clients, employees, interns, candidates and suppliers. Taking into account the nature, scope, context and purposes of the processing of personal data, the MANGO Group undertakes to allocate the necessary resources and implement appropriate technical and organisational measures to ensure a uniform and high level of

protection of the rights and freedoms of natural persons.

This policy is carried out on behalf of MANGO MNG SA, the parent company of the MANGO Group that has all the centralised information systems. However, the information contained in this policy, based on the stipulations of current legislation, affects the entire organisational structure of the MANGO Group. Furthermore, these stipulations must be complied with and observed by all personnel (internal or external) with access to personal data.

## 2. Objective

The main objectives framed in this policy are listed below:

- To determine and establish the bases for defining the control and management of information, in accordance with the requirements of the bu-

siness activity, the legal, regulatory or regulatory requirements, and the obligations assumed in internal contractual contexts and/or with third parties in all areas and wherever the MANGO Group operates.

- Ensure compliance with legal, regulatory or regulatory requirements in the adoption of new technologies for the development of business operations, improvement of productivity or innovation such as the application of Generative AI, access to and use of Metaverse platforms, creation and/or commercialization of NFTs, presence in digital and/or social universes such as Roblox, etc...

- Have an internal regulatory system for the control and management of the privacy of the personal data of customers, employees, interns, candidates and suppliers.

- Establish the principles for assessing and rating privacy risk.

- To provide the MANGO Group's information with adequate and proportional protection based on its confidentiality, integrity, availability, legality and traceability, regardless of the format, processing system or location in which it is located.

- Confirm and disclose to the entire MANGO Group the importance that Management attaches to the privacy of information.

## 3. Scope

It is the primary desire of the MANGO Group to establish the rules applicable to the privacy of personal data, as well as to guarantee its confidentiality and to inform, train and raise awareness among all its employees and collaborators to ensure their appropriate compliance.

The content of this policy, as well as the regulatory framework that develops it, are mandatory

for all employees, collaborating interns and other third-party providers who have access to personal data.

This Policy, as well as its development and application, will be subjected, at least once (1) a year, to a review to verify its adequacy. This review will take into account the changes made in the current legal framework, the results of audits and the risk analyses carried out since the last review.

4. Privacy organization

The roles and responsibilities in terms of privacy established to enable the control and protection of privacy, as well as to ensure compliance with the objectives and principles defined in this policy, are as follows:

- **Board of Directors:** endorses, sponsors and gives visibility to the commitment to the privacy

of personal data, promoting its development, implementation and optimisation, mainly through this policy and the rules and procedures that develop it.

- **Privacy Committee:** identifies, advises, alerts, controls and reports the risks of regulatory non-compliance within the MANGO Group. Its function is to ensure that internal procedures are consistent with the objectives of preventing violations and non-compliance with sectoral regulations, laws and even the MANGO Group's own codes of conduct.

- **Privacy Office:** guarantees the management of privacy by design and by default within the MANGO Group and ensures the definition, preparation, development and control of activities related to the protection of personal data. It therefore assumes the role of coordinating and establishing minimum privacy requirements, as well as ensuring that all personnel involved

(employees, collaborators and third parties) are aware of the importance of the information they handle and its vulnerabilities.

- **Data Protection Officer:** in charge of offering advice and ensuring compliance with data protection regulations in the organisation and whose functions are regulated in the Statutes of the DPO.

5. Basic principles

This privacy policy is based on the following basic principles of mandatory compliance:

- Personal data is a strategic asset, so it is necessary to safeguard it from risks that may affect its confidentiality, availability, integrity and traceability, through the application of technical and organisational security measures aligned with business needs and objectives throughout its

life cycle, regardless of the system and form of processing.

- Personal data must be processed in a lawful, fair and transparent manner, and must be collected from the interested parties for specific, explicit and legitimate purposes and kept for the necessary period of time according to their processing.

- The risks to personal data that may materialize must be evaluated periodically and reasonable and proportionate measures proposed in this regard for their resolution within a reasonable time.

- Responsibilities in terms of privacy must be adequately defined, based on the established strategy, generating the corresponding organizational structure.

- Protection measures and/or controls proportionate to the risk and impact to be mitigated must be implemented.

- Implementation of adequate and proportional access control to personal information.

- Privacy security is ensured to be an integral part of the information systems lifecycle.

- Responsibilities for information privacy will be defined, shared, published, and accepted by each employee, vendor, and third party.

- Any person who processes or may process personal data must be trained, aware and sensitized in terms of privacy and information security, as well as the serious consequences of non-compliance.

- An Information Privacy compliance program that is aligned with business needs and regulatory requirements is defined, implemented, operated, and continuously improved.

6. Statement of compliance

Mango users (Mango being understood as the entire MANGO MNG Holding group) must necessarily agree to this policy.

Con mi firma en este documento me doy por With my signature on this document I acknowledge and accept the obligatory compliance with the Privacy Policy. Failure to comply with this may result in sanctions and/or termination of the employment and/or contractual relationship with Mango, and, where appropriate, the demand for liability for damages that may be caused.

7. Validity and review

This policy is approved in May 2024. It will be reviewed **at least every 2 years** or in case of substantial modifications.

NAME

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VERSION

0.0

1.0

1.0

1.1

1.2

1.3

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August 30, 2024

November 28, 2024

REVIEWING/APPROVING BODY

Privacy Office - Legal

Privacy Office - DPO

Compliance and Privacy Committee

Board of Directors

Privacy Office - DPO

Privacy Office - DPO

DESCRIPTION

Content Writing

Content Overhaul

Submission to the Compliance and Privacy Committee

Approval by the Board of Directors

Content Overhaul

Revision of objectives at the request of the Board of Directors

**MANGO**