



DATA PROTECTION POLICY

1. Data controller

The data controller for the data of the sender is “Sociedad Estatal Correos y Telégrafos, S.A., S.M.E” (hereinafter, “Correos”), with Spanish Tax ID A-83052407 and registered address at Calle del Conde de Peñalver 19, 28006 Madrid (Spain).

As regards the data of the recipient, Correos will act:

- i. As data processor when the data thereof have been provided by an individual or legal entity subject to data protection regulations;
- ii. As a data transferee where data were provided by legal entities or individuals subject to data protection regulations for the purposes indicated in Point 7, “Use of the SMS messaging service to mobile phones, email and/or push notifications” of this Data Protection Policy.
- iii. As data controller when the data thereof have been provided by an entity not subject to data protection regulations.

For the purpose of guaranteeing the proper management of said data processing activity, Correos has appointed a Data Protection Officer (DPO or DPD) who can be contacted at the following email address regarding any matters related to this issue: dpdgrupocorreos@correos.com

2. Purpose and legitimacy of processing

Your data is processed for the following purposes:

A. Provision of the service requested

The data of the sender will be processed for providing the package delivery, postal delivery and email communication service requested, which, among other activities, implies the following: (i) Processing the hiring of Correos services as a registered or unregistered customer; (ii) Delivery of the communication to the indicated address and, if applicable, certification of the content and delivery status; (iii) Processing and responding to your queries, questions or claims; and (iv) Philately services.

In turn, the data of the recipient will be processed for proceeding to delivery and, whenever required by the sender, accrediting reception thereof by:

- Recording the name and surname of the receiving party and their ID number, together with a recording of their signature either on paper or using our PDAs. In any event, the receiving party may ask to sign on paper.
- In addition, and besides the aforementioned procedures, certain senders ask Correos to verify the authenticity of the reliable ID document shown by the receiving party either for compliance with a regulation, for fraud prevention purposes or because, due to the assessment made solely and exclusively by the sender, such validation is proportional and necessary. When providing this service, Correos will restrict itself to following the instructions provided by the sender and will therefore obtain a copy of the reliable identification document and check for any signs of forgery using mechanical reading methods or other verification techniques. Correos will accept no liability for any failure to accredit the identity of the receiving party if the receiving party refuses to allow their identity details and, where applicable, their power to represent the recipient to be checked.

The receiving party and/or recipient should contact the sender directly if they wish to lodge a complaint or make a claim in this regard.

The sender expressly states and guarantees to Correos that these data have been provided by the recipient and that the sender has obtained unequivocal consent from the recipient to use said data for the aforementioned purposes, holding Correos harmless from any liability for the breach of such obligation.

If for collection of the shipment, the sender at the time of contracting the services provides Correos with data regarding a third party other than the sender themselves, the sender expressly states and guarantees to Correos that the data were provided by the third party in question with their unequivocal consent for use for the purpose of arranging the collection of the product at the address and contact details provided by the sender, holding Correos harmless from any liability for the breach of such obligation.

In order to provide a better service and for management of the delivery process, and provided that the sender has provided a telephone number and/or email address for the recipient, or the recipient is registered on the Correos app, Correos will make use thereof to contact the recipient and manage the delivery; for example, to inform them of the approximate day and time of delivery or to deal with delivery-related incidents (delays, inability to deliver, etc.) as described in Point 7 of this Data Protection Policy.

Whenever the delivery is made to a Correos branch and the identity of the recipient does not match that of the person wishing to receive the delivery, Correos will ask the receiving party to accredit their power to represent the recipient and may keep a copy of any documents shown in this regard.

To provide PHILATELY SERVICES to subscribers NOT registered in Correos' Oficina Virtual, data will be processed to formalise philately product orders, whether an occasional order or subscription to one of our collections.

B. Sending offers and promotions about Correos Oficina Virtual products and services

Correos may send you, by electronic means, commercial information on offers, promotions and discounts related to products and services marketed through Correos' Oficina Virtual.

However, you may object to receiving these types of commercial communications by any of the following means:

- By ticking the objection box provided when collecting personal data for registering as a user of the service.
- By sending an email to bajas-comunicaciones@correos.com
- Via the "Unsubscribe" or similar links that appear in all commercial communications.

In relation to PHILATELIC SERVICES, Correos may send the user commercial information by electronic and non-electronic means, as long as this concerns philately-related products and services. The above includes: (i) the Philately Newsletter, (ii) invitations to philately events, (iii) collectibles, (iv) offers and promotions (special offers and services relating to the world of philately), and (v) gifts. In this way you may start new collections, enjoy any promotions that enable you to complete collections you have already started or learn more about philately through our Museum of Philately. The lawful basis for sending information consists of:

- Legitimate interest for sending non-electronic commercial information.

- The existing contractual relationship between you and Correos for sending electronic commercial information.
- However, you may object to receiving these types of commercial communications by any of the following means:
- By ticking the objection box provided when collecting personal data for registering as a user of the service.
- By sending an email to filatelia.crm.datos@correos.com
- Via the “Unsubscribe” or similar links that appear in all commercial communications.

C. Sending Christmas greetings

Correos may send Christmas greetings to those users who have a prior contractual relationship with Correos, for the purpose of consolidating the relationship with the recipients of communications by sending an annual electronic Christmas greeting during the Christmas period. The data used to conduct this process will solely consist of contact details and, from time to time, identification data.

It is in the legitimate interest of Correos to promote, strengthen and enhance the corporate image of Correos by sending this kind of communications in the form of seasonal greetings.

The greetings will be corporate in nature. The recipient may opt not to receive further similar commercial communications via the unsubscription option included in the email itself. You may request additional information on how we have evaluated our legitimate interest and your own interests by writing to dpdgrupocorreos@correos.com.

The legitimacy of this processing is based on the legitimate interest of Correos.

D. Sending offers and promotions about other Correos products and services

If you provide your consent, Correos may send you commercial information related to the provision, improvement and updating of our products and services, new rates and discounts via any electronic or non-electronic channel.

E. Sending of offers and promotions from Correos Group companies and third-party companies

If you provide your consent, Correos may send offers and promotions about the following to you via any electronic or non-electronic channel:

- Other Correos Group companies that provide services related to the sectors of package delivery, added-value postal services, logistics, marketing and telecommunications.
- Other companies with which Correos has entered into partnership agreements and that may belong to sectors such as telecommunications, finance, mass market, healthcare, or NGOs.

F. Sharing data with other Correos Group companies and third-party companies

If you provide your consent, Correos may share your data with Correos Group companies and other companies whose sectors are detailed above so that these companies can send you offers and promotions related to their products and services directly without Correos intervening.

G. Enriching your information

If you provide your consent, Correos may obtain more information about your characteristics, tastes and needs through the information provided by different external sources such as public records, land registry, social networks, geomarketing tools, economic information databases such as INFORMA, credit histories such as ASNEF, BADEXCUG, etc. in order to make

improvements to our products and services and/or adapt or choose the offers for these products and services that best suit your specific profile.

H. Compliance with legal obligations

Some of the various legal obligations assumed by Correos include those derived from applying the postal regulations (Law 43/2010 on the universal postal service, the rights of users and the postal market), the obligation of secrecy of communications (Article 18 of the Constitution), as well as tax law.

In compliance with these obligations, Correos may communicate your data to Public Administrations and courts whenever said information is required for the established legal proceedings.

I. Statistical information and customer satisfaction surveys

Correos has a legitimate interest in knowing the opinion of its customers regarding its products and services, as well as their consumption habits (e.g. the frequency/recurrence of contracting different services) in order to be able to offer products and services that are more in line with their needs, and to improve its current products and services and contracting process. Hence, whenever the customer accepts this policy, they accept the reception of satisfaction surveys.

To achieve the purpose detailed above, Correos may process your data and:

- Conduct satisfaction surveys, either by telephone or electronically, even after you are no longer a customer, in the latter case to find out why you left. If, during the satisfaction survey, a customer states their opinion of the products and services of any of the Correos Group companies, the result of the survey and the identifying information of the participant may be communicated to the Correos Group company in question.
- Anonymise the data, so that the information concerning your consumer habits cannot subsequently be linked to your person, and then carry out statistical and econometric studies (e.g. to know the customer's life cycle and/or identify models of propensity to abandonment).

If the customer wishes to no longer receive satisfaction surveys, they must write to the following email address soluciones.digitales@correos.com to no longer receive them.

3. Type of data processed

A personal data set is processed for the purposes explained in the sections above that can be divided into the following sources and categories:

A. Data provided by customers directly:

When registering as a customer and/or when requesting a service, through filling out the forms provided for such purpose.

The customer ensures that the data given to Correos for the provision of the requested services are accurate and shall communicate any change that may affect them. As a result, the customer is liable to Correos and third parties for any damage or harm caused as a result of not complying with the obligations assumed in this clause.

B. Data collected indirectly

All data that, having received your consent, Correos collects from the external sources listed above in 2.G.

C. Data stemming from provision of the service:

e.g.: List of products and services contracted in the past and their characteristics, claims or requests for information.

4. Data sharing and international transfers

In general, we do not intend to communicate your data to people outside Correos. However, the following exceptions may occur:

- To comply with the law, we may be required to share your data with third parties such as public authorities (e.g. law enforcement) or courts.
- To provide you with the best service for browsing our website and to process your request, we may be required to share your data with other companies in the Correos Group that are engaged in package delivery, added-value postal services, logistics, marketing and telecommunications. So, for example, if you request information about multi-channel direct marketing services, your data will be communicated to NEXEA Gestión Documental S.A., S.M.E to process the response.

Additionally, for international deliveries, and in order to comply with the request made by the sender, Correos must share the sender's data, the recipient's data and the description of the merchandise with the customs authorities and postal service operator in the destination country that will be responsible for making the delivery.

In this regard, the sender is informed that both the customs authorities and the postal service operator in the destination country may be located in a country where data protection regulations have not been declared adequate by the European Commission and/or do not provide appropriate safeguards for data processing. You may consult the List of Countries whose data protection regulations provide an adequate level of safety on the website of the Spanish Data Protection Agency and the website of the European Commission. Furthermore, we inform you that said international data transfers are legitimised as necessary for providing the service contracted by the sender, in accordance with Article 49.1.b), c) and d) of the GDPR.

Similarly, whenever you contract provision of the Paq Premium Internacional service, Correos must share the personal data of the sender, the personal data of the recipient and the description of the merchandise with Cooperativa EMS for the purpose of drawing up statistical reports, improving the quality of this Paq Premium Internacional service and for auditing the

provision thereof, in compliance with the regulatory framework of the Universal Postal Union (UPU) and the Internal Regulations of Cooperativa EMS, of which Correos is a member. We inform you that said international data transfers are legitimised by the need to do so for providing the service contracted by you, in accordance with Article 49.1.b), c), and d) of the GDPR.

5. Data storage time

For a period of 6 months from the time the cancellation request is made, Correos will offer its users the possibility of recovering their former account. Once that period has expired, the data will be erased in accordance with data protection regulations, which involves blocking them; they will only be available at the request of judges and courts of law, the Public Prosecutor and competent Public Administrations during the limitation period for the actions that could arise. They will subsequently

be eliminated. Limitation periods vary depending on the type of service; for example, in general the limitation period for most personal civil actions is 5 years.

Similarly, Correos will block customers who are inactive for a period of 5 years. Users who have registered for the Oficina Virtual service, but have not used it for more than 5 years, will be considered inactive customers.

6. Your rights

Our data protection regulations provide you with a series of rights relating to the data processing involved in our services, and they can be summarised as follows:

- Right to access: Knowing what type of data we are processing and the type of processing we are carrying out.
- Right to rectification: Being able to request the modification of your data if they are inaccurate or false.
- Right to data portability: Being able to obtain a copy of the data being processed in an interoperable format.
- Right to restrict processing, in those cases provided for by law.
- Right to erasure: Requesting the deletion of your data when the processing is no longer necessary.
- Right to oppose: This right allows you, for example, to request for us to stop sending you commercial communications.
- Right to withdraw the consent given.

You can exercise your rights through any of the following channels:

- a) Postal address: Calle del Conde de Peñalver 19, 28006- Madrid (Spain)
- b) Email address: derechos.protecciondatos.correos@correos.com

You can find a set of forms that will help you exercise your rights on the website of the Spanish Data Protection Agency (AEPD). Moreover, we inform you that you have the right to file a claim with the control authority (in Spain, the AEPD) if you feel that your rights have been breached.

7. Use of the SMS messaging service to mobile phones, email and/or push notifications.

In order to provide a better service, Correos may use the telephone number or email address of the recipient to inform them of estimated delivery dates and handle any incident that may affect the delivery. If the recipient is registered on the Correos app and has given their consent to receiving push notifications, the information will be sent by this channel.

The processing of email, telephone and push notifications data will be limited to the following purposes: i) information on the day and approximate time of delivery of the item to the recipient, or for dealing with incidents relating to delivery (delays, absent couriers, incidents preventing delivery to the recipient, etc.) This information will be provided via push notifications, SMS and/or email; ii) to conduct satisfaction surveys on the communications received from Correos relating to deliveries. Recipients will be surveyed via SMS and/or email.

If the sender is a legal person or individual subject to data protection regulations, as the data transferor, they guarantee compliance with the obligations corresponding to current data protection regulations. Specifically:

- The sender declares the lawful provenance of the personal data provided to Correos, guaranteeing that they were obtained in compliance with the requirements established in the current personal data protection regulations.
- The sender declares they have informed the interested parties of the purpose for which their personal data will be used, and if applicable, that they have provided sufficient information relating to the transfer of data specified in this clause.
- The sender declares that, in cases where it is necessary, they have obtained the informed consent of the interested parties for the provision of data for the purposes specified in this clause, in accordance with the requirements of the current data protection regulations.
- The sender guarantees that they have adopted appropriate security measures, according to the risk analysis conducted, in order to ensure the confidentiality and integrity of the personal data being communicated.
- The sender undertakes to inform Correos when applicable of any rectification or erasure of the information sent in accordance with this clause, as soon as possible and always within the legally established periods.

Correos, as the transferee of the recipient's data, will be considered the data controller and must comply with all corresponding obligations of that role as established in the applicable regulations. Specifically, Correos must:

- Comply with the obligations set forth in personal data protection regulations for the data controller as a consequence of assuming this role after the data transfer regulated in this clause.
- Maintain a record of processing activities relating to the data processed under its responsibility.
- Provide the interested party with appropriate information on the processing conditions of their personal data.
- Allow the interested party and owner of the transferred personal data to exercise their rights over their personal data.
- Adopt appropriate security measures according to their risk analysis.
- Respect the confidentiality of the transferred data in all cases.

Each of the parties will be responsible for breaches of the obligations corresponding to them, answering for the loss or damage which may arise, and in particular, for the penalties which may be imposed the Spanish Data Protection Agency or any other competent body, whether Spanish or European, due to a breach of the obligations established in this clause.

8. Access to third-party data

Whenever Correos acts as the data processor, it will only process the recipient's data for completing delivery of the communication or shipment and, where necessary, to accredit the delivery, either by collecting the details of the receiving party or completing additional verification actions when asked to do so by the sender.

Additionally, in order to better provide the service, the telephone number or email address may be used to inform the recipient of estimated delivery dates and handle any incident that may affect them. The customer ensures the truthfulness and accuracy of the recipient's information and, where applicable, confirms compliance with all data protection obligations that may be attributable to

them, having obtained the recipient's consent for Correos to carry out the processing described above, should said consent be necessary.

If the user is a company or professional who gives Correos access to personal data under their responsibility for the provision of any of our services, Correos undertakes to comply with all the obligations inherent to its position of data processor:

- It will access and process the data to which it has access subject to the instructions thereof, not using said data for purposes other than provision of the service. To do so, it may use the services of other third parties (sub-processors), if it becomes necessary for the service provision and contracting operations and/or storage, provided that (i) the new processor is subject to the same terms and conditions (instructions, obligations, safety measures, etc.) and the same formal requirements in terms of the correct processing of personal data and guaranteeing the rights of the individuals involved; (ii) Correos, upon explicit request, makes available a list identifying the sub-processed services and the identity of the sub-processors; and (iii) If the sub-processor is not compliant, Correos will continue to be fully liable.
- It will implement the proper legal, technical and organisational measures to guarantee a level of security that is proportionate to the risk, in accordance with the provisions of Article 32 of the GDPR and, upon your request, will inform you of the risk assessment methodology used.
- When the provision of service subject to the contract comes to an end, it will destroy or return the processed data as well as any media or documents containing the data that have been processed, without prejudice to the option to store these data, under due protection, pursuant to the terms of our data protection regulations.
- It will ensure compliance with all other obligations contained in the data protection regulations.

9. "Escaneo" and "Escaneo con Validación" services:

For the "Paquete Premium y Estándar" services contracted with the added value services "Escaneo" (scanning) and "Escaneo con validación" (scanning and validation), Correos will act as a data processor on behalf of the customer, who is responsible. Thus:

- Correos will access and process the data to which it has access subject to the instructions of the customer, not using said data for purposes other than service provision. To do so, it may use the services of other third parties (sub-processors), if necessary for the service provision and contracting operations and/or storage, provided that (i) the new processor is subject to the same terms and conditions (instructions, obligations, safety measures, etc.) and the same formal requirements in terms of the correct processing of personal data and guaranteeing the rights of the individuals involved; (ii) CORREOS, if expressly requested by the customer, provides a list identifying the sub-processed services and the identity of the sub-processors; and (iii) if there is any breach by the sub-processor, Correos will continue to be fully responsible.
- Correos and the authorised persons will keep secret and in the strictest confidentiality the personal data to which they have access due to the commission.

- Correos will implement the proper legal, technical and organisational measures to guarantee a level of security that is proportionate to the risk, as set forth in Article 32 of the GDPR, and on request, will inform the customer of the risk assessment methodology used.
- Correos will provide the customer with all necessary information to demonstrate its compliance with its obligations.
- Correos will assist the customer in conducting risk analysis, presenting preliminary questions to the AEPD, notifying security breaches, and responding to rights requests. Notifying the Data Controller of security breaches will not be necessary when the security breach does not constitute a risk to the rights and freedoms of individuals, taking into account the criteria established by the AEPD in the Guide to management and notification of security breaches.
- When the provision of service subject to the contract comes to an end, Correos will destroy or return the processed data at the written request of the customer, as well as any media or documents containing the data that have been processed, without prejudice to the option to store these data, under due protection, pursuant to the terms of our data protection regulations.
- Rights management: Correos will immediately pass to the customer any requests to exercise data protection rights or complaints or claims relating to data protection by interested parties, and in no case later than seven calendar days from their reception.
- Correos will ensure compliance with all other obligations contained in the data protection regulations.

In the context of provision of the “Escaneo” (scanning) and “Validación con escaneo” (scanning and validation) services, the customer must inform the recipient that the delivery of the item is subject to and conditional on the scanning and/or validation of their identity document.

The customer alone must determine whether it is necessary or proportionate to check identity via the validation of the identity document. Thus, Correos accepts no liability for any ruling by the Spanish Data Protection Agency that such treatment was excessive or disproportionate.

Correos will accept no liability for any failure to accredit the identity of the recipient if the recipient refuses to allow their identity details to be checked, and any complaint or claim on the matter by the recipient must be directed to the customer.