

Corporate Data Protection Policy

**Approved by the Board of Directors
of El Corte Inglés, S.A.
on 28 February 2024**

Version 3.4 (29 October 2025)

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1. Introduction

Since its establishment, El Corte Inglés, S.A. and its Group companies have recognised the value of data as an asset and the importance of responsible data management in maintaining the trust of the Members of the Organisation, customers and other stakeholders. Accordingly, the Board of Directors, on the recommendation of the Audit and Control Committee, has approved the following Corporate Data Protection Policy (hereinafter referred to as the 'Policy') to establish the general principles that should govern all companies within the El Corte Inglés Group.

Within the scope of its application, this Policy ensures compliance with the following key standards:

- Universal Declaration of Human Rights
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- 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 (hereinafter referred to as "GDPR")
- Organic Law 3/2018 on the Protection of Personal Data and the Guarantee of Digital Rights
- Law 34/2002 of 11 July on Information Society Services and Electronic Commerce
- Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024 (Artificial Intelligence Act)
- Lei n.º 58/2019 of 8 August (applicable in Portugal)

It also develops the Code of Ethics and is aligned with the other Corporate Policies, in particular the following:

- Corporate Information Security Policy
- Compliance Policy
- Risk Management and Control Policy
- Corporate Customer Service Policy

Aware of the importance of earning and maintaining the trust of customers, employees and users (data subjects), the El Corte Inglés Group guarantees the control and protection of personal data processed by the Group companies. This Corporate Data Protection Policy has been developed with the objective of reinforcing the Group's commitment to respecting the privacy rights of all data subjects whose data is accessed by Group companies, either directly or indirectly, in the course of the relationships maintained with them.

2. Purpose of the Policy

The purpose of this Policy is to establish a general framework to ensure the privacy and protection of personal data relating to customers and users, employees and collaborators of the companies within the El Corte Inglés Group (hereinafter, the “Group”), as well as to ensure the ethical and responsible use of data, in accordance with the legislation in force at any given time.

In order to ensure compliance with such legislation, this Policy sets out the basic principles followed by the Group to protect personal information. These rules shall be applied consistently across all Group entities, ensuring that personal data are processed in a secure and responsible manner, in accordance with applicable legal requirements.

In this way, the Group underlines the importance of maintaining the trust of data subjects, recognising the significant value of their personal data, as such data represent essential aspects of their identity, privacy and personal life. This implies respect for the fundamental right to data protection of all individuals whose personal data are processed by the Group companies, whether directly or indirectly.

El Corte Inglés, S.A. and the companies within the Group undertake to implement appropriate technical, legal and organisational measures, based on a risk-based and proactive accountability approach, to ensure that all personal data processing operations are adequately protected against threats and risks that could affect the confidentiality, integrity and availability of the Group’s information systems.

3. Scope of Application and Relevant Bodies

This Policy is mandatory and applies throughout the El Corte Inglés Group and is binding on all Members of the Organisation, irrespective of their position or role.

It shall also apply to Business Partners when carrying out their activities within the Group.

These commitments shall be formalised through express agreements or statements of compliance with the principles set out herein. In the case of Business Partners, such commitments may be formalised through the inclusion of specific clauses in contracts or by means of commitment letters. Accordingly, this Policy shall be made available to all Members of the Organisation and shall be provided to Business Partners and other Third Parties who may require it, taking into account their specific circumstances.

The Compliance and Risk Control Department shall be responsible for overseeing proper compliance with this Policy. However, responsibility for complying with ethical rules and standards lies with the entire Organisation and, therefore, with each and every one of its Members, without exception.

As the parent company of the Group, El Corte Inglés, S.A. is responsible for establishing the foundations and mechanisms necessary to ensure appropriate and efficient coordination between the parent company and the other companies within the Group. These arrangements shall be further developed through instruments governing the progressive fulfilment of more specific commitments.

All of the above shall be without prejudice to, and shall not limit in any way, the autonomous decision-making capacity of each of the Group companies, in accordance with their respective own interests.

4. General Principles

In processing the personal data of data subjects, the El Corte Inglés Group adopts measures aimed at preserving the following principles, which determine how personal data are collected, processed, disclosed and deleted:

A. Principle of regulatory compliance:

El Corte Inglés, S.A. and its Group companies are responsible for complying with the principles set out in this Policy, as well as with those required under Spanish and European data protection legislation and any other legislation applicable in the countries in which they operate. They shall be able to demonstrate such compliance at any time, particularly when required by the Group Data Protection Officer (DPO) or by the competent data protection authority.

Group companies have prepared and periodically review a record of processing activities describing the personal data processing operations carried out in the course of their activities.

To this end, the DPO, in accordance with the functions assigned under Regulation (EU) 2016/679, ensures compliance with the principles of confidentiality, integrity and availability of the El Corte Inglés Group's data, regardless of their format, by collecting and processing only personal data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are collected and/or processed.

The DPO shall promote the application of the principles set out in this Policy:

- during the design and implementation of the procedures established for the El Corte Inglés Group;
- in the products and services offered by the El Corte Inglés Group;
- in all contracts and obligations entered into or undertaken by the El Corte Inglés Group;
- in the implementation of systems and platforms that allow employees or third parties to access information and/or personal data.

Security shall be understood as a comprehensive process involving all human, technical, material and organisational elements related to the system. Accordingly, appropriate measures shall be adopted to ensure that all persons involved in the process are familiar with this Policy and perform their duties in accordance with it.

B. Principle relating to the Collection of Information and Data Processing:

In accordance with the legislation applicable at any given time, and in relation to information collection and data processing activities concerning shareholders, employees, customers, visitors, suppliers and others, the necessary measures shall be adopted to ensure that the personal data collected, stored and processed are handled lawfully and fairly.

Data subjects shall be informed in a transparent, explicit, accurate and unambiguous manner about the use of their data. Whenever data are collected, the data subject shall be informed of the following:

- the identity of the entity responsible for collecting the data;

- the purpose of the data processing, and the fact that the data will not be further processed in a manner incompatible with that purpose;
- the third parties or categories of third parties to whom the data may be transferred, where applicable;
- the legal basis for the processing;
- the existence of profiling, where applicable;
- the intention to carry out international data transfers, where applicable;
- the data retention period;
- the contact details of the Data Protection Officer.

The acquisition, collection or transfer of information or data from unlawful sources, or from sources that cannot guarantee the lawful origin or adequate protection of such data, is strictly prohibited.

C. Principle relating to the Rights of Data Subjects:

El Corte Inglés, S.A. and its Group companies provide data subjects with the tools and/or procedures necessary to ensure the effective exercise of their rights of access, rectification, objection, erasure, portability, restriction and any other rights that may be applicable in the future in each jurisdiction.

To this end, internal processes have been established to enable the centralised management of data subject rights through an omnichannel customer service system, including both physical and digital channels.

D. Principles relating to Security Measures and Confidentiality:

El Corte Inglés, S.A. and its Group companies design, implement, operate and maintain all organisational, legal and technical security measures necessary to ensure a level of security appropriate to the risks associated with each personal data processing activity, in accordance with applicable security standards, the relevant legislation, and El Corte Inglés' internal information security policies.

In accordance with applicable legislation, the information and data collected and processed by El Corte Inglés, S.A. and its Group companies are treated with the utmost confidentiality and are not used for purposes other than those for which they were collected, nor disclosed or transferred to third parties except in cases permitted by law and in accordance with legally established procedures.

The applicable data retention periods established for each specific case shall also be duly respected.

The security principles are materialised in the following areas:

d.1 Risk Management

Appropriate risk levels are maintained through the implementation of suitable and continuously updated security measures, ensuring a balance and proportionality between the nature of the data and the processing activities carried out, the risks to which such data may be exposed, and the security measures applied.

d.2 Impact Assessment

Following the appropriate risk analysis, the Group shall exercise particular diligence in the processing of personal data that may entail a high risk to the rights and freedoms of data subjects, by implementing security measures commensurate with the potential risks identified.

The Data Protection Officer shall provide guidance in the performance of data protection impact assessments and promote a proactive culture of privacy.

d.3 Management of Security Incidents

El Corte Inglés, S.A. and its Group companies apply a common procedure for the management of personal data security incidents and/or breaches, in accordance with the internal policy approved for this purpose. To this end, the El Corte Inglés Information Security Department operates a security incident response service supported by a multidisciplinary team drawn from different departments, which is equipped with the necessary resources to implement and manage all required security measures and to respond effectively to any security incidents that may arise.

E. Third-party Due Diligence:

El Corte Inglés, S.A. and its Group companies, acting as Data Controllers, ensure that any contracting or collaboration with third parties who, by virtue of the activity or service provided, may have access to personal data, is carried out under their authority and in accordance with their instructions. In all cases, such third parties shall act securely by adopting the necessary technical and organisational security measures and by complying with applicable data protection regulations throughout the duration of the contractual relationship.

El Corte Inglés, S.A. and its Group companies that engage third-party service providers with potential access to personal data are responsible for verifying the suitability of such third parties from a privacy management perspective, ensuring that they provide sufficient guarantees and comply with the security measures required in each jurisdiction in which El Corte Inglés, S.A. and its Group companies operate.

F. International Transfers of Information and/or Data

Any processing of personal data subject to European Union legislation that involves the transfer of such data outside the European Economic Area shall be carried out in strict compliance with the requirements established under the applicable legislation in the jurisdiction of origin.

Likewise, El Corte Inglés Group companies located outside the European Union shall comply with the requirements applicable in their respective jurisdictions when carrying out international data transfers.

In this regard, the Group shall protect the rights of data subjects in international transfers of personal data to third countries, ensuring the implementation of appropriate technical, legal and organisational safeguards at all times.

G. Principle of Data Quality and Accuracy

El Corte Inglés, S.A. and its Group companies shall adopt reasonable measures to ensure that the personal data of data subjects is kept up to date and that such data is erased or rectified without delay when it is inaccurate in relation to the purposes for which it is processed.

H. Principle of Data Minimisation

El Corte Inglés, S.A. and its Group companies shall apply technical and organisational measures to ensure that only personal data that is strictly necessary for the specific and legitimate purposes for which it was obtained is collected and processed. This ensures that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

I. Staff Training and Awareness

Training and awareness in data protection matters are essential for El Corte Inglés, S.A. and its Group companies. Accordingly, training initiatives shall be implemented to enhance employees' knowledge, skills and attitudes, with the aim of improving the processing of information containing personal data.

To this end, mechanisms shall be implemented to ensure the continuous updating of data protection knowledge, enabling employees and collaborators to perform their duties efficiently and responsibly when handling personal information.

J. Cooperation with the Supervisory Authority

El Corte Inglés, S.A. and its Group companies undertake to cooperate diligently with the competent supervisory authority, as part of the principles underpinning all actions of El Corte Inglés and its responsibility towards the society in which it operates, by making available any information requested.

5. Awareness and Statement of Compliance

Compliance with ethical rules and standards represents both a corporate commitment and a strategic objective for the Organisation. Therefore, all Members of the Organisation are expected to be familiar with and adhere to the contents of this Policy. Likewise, all Business Partners are expected to act in accordance with its principles.

This commitment shall be formalised through:

- i. Statements of compliance with the principles set out herein by Members of the Organisation, confirming their acceptance of **High Ethical Standards**.
- ii. **Compliance clauses included in contracts** with Business Partners
- iii. **Formal agreements or acknowledgement** by the governing bodies of the companies within the El Corte Inglés Group, in accordance with applicable internal regulations.

Such agreements and their renewals shall be notified to the El Corte Inglés Group's Compliance and Risk Control Department.

In the event of significant changes to this Policy (i.e. changes that require formal approval from the Board of Directors of El Corte Inglés, S.A.), the preceding commitments shall be formally renewed.

The Organisation shall respond promptly to any breach of the provisions set out in this Policy, in accordance with its internal regulations and in compliance with all applicable legislation.

6. Reporting of Non-Compliance

Any Member of the Organisation, Business Partner or Third Party with a direct relationship and legitimate commercial or professional interest, or any other interested party, who becomes aware of a breach of this Policy or who has doubts as to whether an observed practice may constitute an unlawful act, whether in the public or private sector, shall immediately contact the **Compliance and Risk Control Department** of the El Corte Inglés Group. This shall be done via the Ethics Channel, using any of the available means of communication:

- **Digital Channel:**

The El Corte Inglés Group's digital channel can be accessed via the following website:

<https://www.elcorteingles.es/informacioncorporativa/es/gobierno-corporativo/etica-y-cumplimiento/>

This access is available on the corporate website and additionally on the NEXO intranet for Members of the Organisation.

- **Postal address:**

El Corte Inglés, S.A.
Compliance and Risk Control
Hermosilla, 112
28009 Madrid

- **Compliance and Risk Control Department – Phone number: 91 401 85 00**

- **Request for a face-to-face or remote meeting**

The information communicated through this Channel is confidential, as is the identity of reporting persons acting in good faith, whose cooperation the Organisation appreciates and in respect of whom it guarantees the absence of retaliation of any kind.

In addition, the **Compliance and Risk Control Department** may act on its own initiative by investigating any indication of non-compliance with this Policy.

7. Dissemination

Once approved by the Board of Directors of El Corte Inglés, S.A., this Policy shall be accessible on NEXO for all Members of the Organisation and on the corporate website for all ECI Group stakeholders.

The Compliance and Risk Control Department shall promote and implement the necessary actions to ensure the adequate dissemination and awareness of this Policy.

8. Control, Monitoring and Supervision

8.1 Control and Monitoring

El Corte Inglés, S.A. and its Group companies are committed to adopting and maintaining a centralised and comprehensive privacy management system, enabling the automation of processes, risk management and the processing of the necessary information, regardless of the Group company in which such processes may arise, in compliance with the principle of proactive accountability.

In order to guarantee data subjects' rights in the field of data protection, as well as compliance with applicable legislation and the principles set out in this Corporate Policy, each El Corte Inglés Group company shall allocate the appropriate resources for its implementation, maintenance and review. Such resources shall be agreed with and made available to the Data Protection Officer.

With the coordination of the Data Protection Officer, supported by the Corporate Internal Development area and the Functional Data Protection Officers, interaction with each area and/or company is ensured for the purposes of monitoring compliance and achieving consistent management in this area.

8.2 Supervision

The Data Protection Officer, assisted by the Corporate Internal Development Department, shall supervise compliance with and the effectiveness of this Policy and shall report the results to the Compliance and Risk Control Department.

9. Approval, Effective Date and Updating

This Policy shall become effective on the date of its approval by the Board of Directors of El Corte Inglés S.A.

This Policy shall be kept up to date over time. To this end, it shall be reviewed regularly, on an annual basis, and on an extraordinary basis where necessary, whenever changes occur in the Group's strategic objectives or in the applicable legislation.

The Compliance and Risk Control Department shall be responsible for assessing any proposed amendments, with the support of the Compliance and Risk Control Committee.

In addition, where such changes are significant, they shall be submitted for approval to the Board of Directors, following a proposal from the Audit and Control Committee.

VERSION HISTORY

Version 1.0 approved by the Board of Directors on 28/Feb/2018

Version	Date of amendment	Purpose of the amendment	Sections affected
2.0	30/June/2021	<ul style="list-style-type: none"> - Regulatory changes - Adapt to the nature of the new Compliance and Risk Control Committee. - Approval, Modification and Updating 	<ul style="list-style-type: none"> - Purpose - Principles of Action - Approval, Effective Date and Updating
3.0	22/Jun/2022	<ul style="list-style-type: none"> - Specify in greater detail the principles and guidelines on data protection, in which significant progress has been made. - Align with the review of the developed privacy policies. 	<ul style="list-style-type: none"> - All sections have been reviewed and modified. - Include a new section on the data protection management system of the El Corte Inglés Group. - Include the principles of data accuracy and data minimisation.
3.1	30/Nov/2022	Adapt the system to the recent integration of the Risk Control and Management area under the Compliance Function.	
3.2	28/Jun/2023	Include the principle of cooperation with the supervisory authority.	Principles of Action

Version	Date of amendment	Purpose of the amendment	Sections affected
3.3	30/Oct/2024	<ul style="list-style-type: none"> - Adapt the structure to the Sustainability Report 2024 reporting model and expand the content to provide greater clarity in this Corporate Policy. - Include a reference to the new internal rules governing the adherence of Group companies to the Corporate Policies. - Update digital channels for reporting non-compliance. 	<ul style="list-style-type: none"> - Introduction - Scope of Application and Relevant Bodies - General Principles - Awareness and Statement of Compliance - Reporting of Non-Compliance - New cross-cutting elements for all Policies
3.4	29/Oct/2025	<ul style="list-style-type: none"> - Regulatory references (Information Society Services Law, Artificial Intelligence Regulation and Portuguese legislation). - General framework to ensure the security and protection of personal data. - Impact assessment, security incident management, third-party due diligence, data minimisation, and staff training and awareness. 	<ul style="list-style-type: none"> - Introduction - Purpose - General Principles

Last revision, 29 October 2025