

11. PRIVACY POLICY GRUP MEDIAPRO

(Aquest document ha estat redactat originalment en castellà. Davant de qualsevol contradicció, preval la versió en aquest idioma).

The Data Controller is the commercial entity GRUP MEDIAPRO, S.L.U., with registered office at Avda. Diagonal, 177-183, Edificio Imagina, 08018, Barcelona and NIF B-60188752 (hereinafter, “GRUP MEDIAPRO”, the “Data Controller” or the “Controller”) which carries out various processing operations related to the services provided through the website mediapro.tv (hereinafter, the “Website” or the “Web”), in other media associated with the same and as part of its business activity.

GRUP MEDIAPRO has drawn up a single document (hereinafter, the “Privacy Policy”) so the user (hereinafter, the “user”, the “users” or “you”) can receive clear and orderly information on all the data processing it carries out.

The Privacy Policy is divided into the following sections:

- [11.1 DATA CONTROLLER.](#)
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By means of this Privacy Policy, the user is informed that the data provided will be processed by GRUP MEDIAPRO in accordance with the information provided in this Privacy Policy, as well as any data derived from browsing and any other data that may be provided in the future.

The data requested in the forms on this Website, as well as in other media associated with it and within its business activity, are, in general, obligatory for the established purposes, unless otherwise indicated. Therefore, if this data is not provided or is not provided correctly, GRUP MEDIAPRO will not be able to fulfil the specific purposes indicated on the corresponding form.

11.1. DATA CONTROLLER.

We inform you that the Data Controller for the processing described in the Privacy Policy is GRUP MEDIAPRO S.L.U., whose contact details are as follows:

- Postal address: Avenida Diagonal 177-183, 08018, Barcelona.
- Data Protection Officer: dpd@mediapro.tv (this e-mail address is only for data protection issues and no other questions will be answered, in particular CVs, videobooks or, in general, proposals for professional collaboration will be deleted).

11.2. PURPOSES FOR WHICH WE PROCESS THE DATA, THE CATEGORIES OF DATA, THE LEGAL BASIS ON WHICH THE DATA IS PROCESSED AND THE STORAGE PERIOD.

Below, we inform you of the different purposes for which GRUP MEDIAPRO may process your data, each of them being independent.

11.2.1 PROCESSING OF DATA RELATED TO THE MANAGEMENT OF THE WEBSITE.

o Purposes of processing

Simply visiting the Website and browsing its different sections does not require you to provide any personal data directly or to register as a user. However, simply browsing the Website may require you to provide GRUP MEDIAPRO with certain data. We also remind you that cookies may be installed on your access device in accordance with the provisions of our [Cookies Policy](#).

The purposes of the processing of personal data that GRUP MEDIAPRO may collect from browsing the Website are:

- To manage the services that GRUP MEDIAPRO offers users through the Website.
- To ensure the security of the network and information comprising its digital infrastructure, i.e. the ability of such network or information system to withstand, at a given level of confidence, accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of your personal data held or transmitted, and the security of related services offered by, or accessible through, these systems and networks.
- Conduct audience and market research with the aim of improving the services provided.
- The management of applications or requests made through the different channels of contact with GRUP MEDIAPRO made available to users (e-mail, telephone, postal address, forms, etc.).

o Category of data processed

Simply browsing the Website implies the collection of personal data in accordance with the provisions of our [Cookies Policy](#). In particular, GRUP MEDIAPRO will process the IP, the user ID, the interaction details, the type of device and the browser used.

Likewise, the following personal data may be processed for the management of requests or made through the various contact channels available on the Website:

- Identification data: name and surname.
- Contact details: postal address, e-mail address and telephone number.
- Other data: data provided by the data subjects themselves in the open fields of the forms provided on the Website or in the attached documents sent.

o Legal basis

The basis that legitimizes the processing of personal data are the following:

- In the case of data processed to provide the services offered on the Website, GRUP MEDIAPRO has a legitimate interest in carrying out audience and market research with the aim of improving its services, as well as guaranteeing the security of the Website. This legitimate interest is based on being able to offer GRUP MEDIAPRO services to users with the highest quality and security and to guarantee the security of GRUP MEDIAPRO information. To this end, we may use previously anonymized data and, in any case, GRUP MEDIAPRO has implemented the security measures required for such processing. However, the user has the right to object to this processing, at any time, through the means indicated in clause "6. RIGHTS OF DATA SUBJECTS REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.
- The consent given by the user when providing the information through the contact channels made available through the Website or the acceptance of the Privacy Policy in the corresponding form.

o Conservation periods

In general, GRUP MEDIAPRO will keep users' personal data for the period necessary to fulfil the purposes described in this Privacy Policy:

- The data will be retained for the times specifically indicated in the [Cookies Policy](#).
- In addition, we will retain anonymized data for longer periods for statistical and analytical purposes necessary to improve our services.

11.2.2 COMMERCIAL COMMUNICATIONS.

o Purpose of processing

If you have given your consent to this, we may send you commercial information by telematic means about content, products and services of GRUP MEDIAPRO, or of companies belonging to the same business group. You will find detailed information on the communications that you may receive when you consent to this processing.

o Category of data processed

GRUP MEDIAPRO may process the following personal data:

- Identification data: name, surname and first name.
- Contact details: e-mail address and telephone number.

o Legal basis

The basis that legitimizes the processing is the express consent given by the user. We inform you that you may revoke your consent at any time through the channel established in the clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy. Similarly, in each of the communications received by the user, the option to unsubscribe from them will be included.

o Conservation periods

The personal data will be kept for as long as the user does not request cancellation of the commercial communications or revoke the consent given for this purpose.

11.2.3 SOCIAL NETWORKS, OTHER SOCIAL MEDIA AND APPLICATIONS.

o Purpose of processing

The purposes for which GRUP MEDIAPRO processes personal data collected through social networks and other social media, such as blogs and/or applications are:

- To allow access to and browsing of the content and services offered by GRUP MEDIAPRO.
- Allow participation in forums and opinion polls to be carried out.
- Moderate the uses you make of GRUP MEDIAPRO sites, applications and social media.
- Disseminate for promotional purposes, through social networks and/or other social media, the different competitions, draws, programmes, promotions, series, etc., produced or co-produced by GRUP MEDIAPRO, as well as the initiatives developed within its business activity.
- Manage any possible incidents that may arise in relation to GRUP MEDIAPRO in the different social networks and other social media.
- Analyze the information obtained through social networks and social media on the perception of our brand or our services based on the comments and opinions made by users. This will help us, for example, to know the audience and whether a content has been liked by the general public or, on the contrary, has not been of interest.
- If the user contacts GRUP MEDIAPRO through the existing profiles on the different social networks and other social media, the purpose of the processing will be the management of the request or contact made.

o Category of data processed

GRUP MEDIAPRO may process the following personal data:

- Data contained in users' social network profiles set up by themselves and other social media, such as blogs and/or applications (in particular, "Nick", email, photo, etc.).

- The data provided by the user when interacting through the communication channels enabled in the different GRUP MEDIAPRO social network profiles and other social media, such as blogs and/or apps (in particular, name, surname, photograph, etc.).
- Photographs and video and/or audio recordings posted by the user on social networks, and other social media, such as blogs and/or apps. Regarding this data, please read carefully the section "3. DATA PROVIDED BY THIRD PARTIES" of this Privacy Policy.

Please note that any information you publish or disclose through the profiles on the social networks managed by GRUP MEDIAPRO and other social media channels, such as blogs, will become public information and will be available to all visitors and the general public. This means that users of the sites and followers of GRUP MEDIAPRO social profiles located in any country in the world will be able to access your information universally. In this regard, users must take special care and diligence when disclosing personal information or any other type of information on these sites.

The collection and use of the information that the social networks collect about the user is governed by their corresponding privacy policies, so we recommend that you consult them before using them. In any case, you must respect their terms of use.

o Legal basis

The legal basis that legitimizes the processing described above are:

- Your consent, expressed by interacting with us on social networks or stating that you want to publish content on social media and/or applications. **We inform you that you may revoke your consent at any time** through the same channel established in clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.
- Your consent, expressed through the transfer of your image rights that you authorize to any of the GRUP MEDIAPRO entities, for the dissemination on networks of the different audiovisual content produced.
- GRUP MEDIAPRO legitimate interest in knowing the perception of its brand and services based on the analysis of the comments made by users and their opinions about them. This legitimate interest has been assessed by GRUP MEDIAPRO, taking into account the necessary balance that the proposed processing activity must present with respect to the rights and freedoms of data subjects, in order to carry it out, thereby overcoming the triple judgment of purpose, necessity and proportionality and is based on being able to offer users GRUP MEDIAPRO services with the highest quality and, consequently, to improve these services and content. In addition, GRUP MEDIAPRO has implemented security measures in accordance with the aforementioned processing in order to guarantee the security of users' information. Nevertheless, the user has the right to object to this processing at any time through the same channel established in clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.

o Conservation periods

The information provided to GRUP MEDIAPRO through the different profiles opened in social networks, the data, images and any content that you may publish in these as well as in social

media and/or applications will be kept in said GRUP MEDIAPRO profiles as long as you do not request their withdrawal or elimination or revoke your consent, if applicable.

11.2.4 ASSISTANTS AS PUBLIC.

o Purposes of processing

If you attend as an audience member or participate in a programme or audiovisual work, we may collect the information necessary to: a) contact you and manage your access to the facilities where the recording takes place and b) record the programme or the corresponding audiovisual work.

o Category of data processed

GRUP MEDIAPRO will process your contact details (name and surname, phone number and e-mail) in order to coordinate the recording and inform, for example, of the place and location where you should go.

Likewise, it is possible that your image and/or voice may be captured because of your participation or attendance as an audience at a programme or audiovisual work. In these cases, such data may be communicated to entities belonging to the same business group, television channels, online platforms or distributors, who may carry out the reproduction, public communication, making available, distribution and, in general, proceed to the widest exploitation of the programme or audiovisual work, including any statements you may make, in any medium, system and format, including television, online platforms and social networks.

o Legal basis

The basis that legitimizes the processing of your personal data are:

- For the purpose of managing attendees as public is the express consent of the data subject or, where appropriate, the execution of the contractual relationship that exists, depending on each case. In this regard, information will be provided in each of these initiatives.
- **We inform you that you may revoke your consent at any time** through the same channel established in the clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.

o Conservation periods

In the event that your image and/or voice is captured, GRUP MEDIAPRO may proceed to the widest exploitation of the programme or audiovisual work in which they are included and of the contents, by way of example, television exploitation, DVD, through digital or electronic media, the Internet and its social networks and new technologies, and by any other means of exploitation (including digital or electronic exploitation) without any time or territorial limit.

Your contact details as a member of the public may also be retained for as long as necessary to manage your attendance and the coordination of the recording and/or for as long as any liabilities arising from the processing may arise.

11.2.5 PARTICIPATION IN AUDIOVISUAL INITIATIVES AND CASTINGS.

o Purposes of processing

The data of users who participate in any of the initiatives, programmes and other similar activities organized by GRUP MEDIAPRO will be processed in order to manage the audio recordings, photographs, videos or any other content sent or recorded by GRUP MEDIAPRO, according to the purpose of the initiative developed, as well as to carry out the production and broadcast of the aforementioned initiatives and to promote, exploit and broadcast them in the programmes, works and audiovisual content produced or co-produced by GRUP MEDIAPRO.

Likewise, GRUP MEDIAPRO will process your personal data for the selection of participants for the castings it may carry out for a specific audiovisual production.

Please consult the relevant bases and/or additional privacy policies made available to users for more detailed information on the processing of your data before participating in any of the above initiatives.

In this case, the user and GRUP MEDIAPRO may use WhatsApp as a means of contact in order to speed up contact with the user. In this regard, please note that WhatsApp has its own privacy policy, which shall apply when using this medium and we recommend that you consult the same.

In any case, users who participate in any of the initiatives mentioned in this clause guarantee the ownership and control of the rights over the texts, audio recordings, photographs, videos or any other content that they may have sent, that they do not infringe any image, honor, intellectual and/or industrial property rights, or any other rights of third parties and that they respect at all times the regulations on the protection of personal data (for more information, please see clause "3. DATA PROVIDED BY THIRD PARTIES") and shall be liable to GRUP MEDIAPRO or to third parties for any damages that may be caused as a result of non-compliance with the above statements.

o Category of data processed

GRUP MEDIAPRO may process the personal data relating to name and surname, telephone number and/or e-mail address, as well as those included in the texts, audio recordings, images, photographs or videos that you may send us.

o Legal basis

The basis for the processing of your data is:

- For the purpose of producing audiovisual works, artistic creations and, in general, audiovisual content produced or co-produced by GRUP MEDIAPRO, carrying out their promotion, exploitation and broadcasting and their conservation in archives and newspaper archives, the express consent of the data subject, in accordance with Royal Legislative Decree 1/1996 approving the revised text of the Intellectual Property Law, the L.O. 1/1982, on the civil protection of the right to honor, personal and family privacy and self-image and the Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereinafter, the "GDPR") and/or, where appropriate, the execution of the contractual relationship that you may have with GRUP MEDIAPRO. **We inform you that you may revoke your consent at any time** through the same channel established in clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy. In this regard, this express consent may be given by the user through different means depending on the audiovisual initiative, such as signing the corresponding authorization for the capture of the image.

o Conservation periods

The information provided to GRUP MEDIAPRO, the data, texts, audio recordings, images, photographs or videos and any content will be kept for the period necessary to fulfil the purposes described in this Privacy Policy.

In the event that the contents submitted by the user are selected for broadcast, we may proceed to the widest exploitation of the programme in which they are included and of the contents, by way of example, the exploitation on television, DVD, through digital or electronic media, Internet and its social networks and new technologies, and by any other means of exploitation (including digital or electronic exploitation) for the maximum period permitted by the Intellectual Property regulations until their entry into the public domain, as detailed below.

In this regard, if the user sends content to GRUP MEDIAPRO for participation in an audiovisual initiative, he/she transfers the corresponding exploitation rights of works or content subject to intellectual property rights to GRUP MEDIAPRO, and the provisions of Royal Legislative Decree 1/1996, of 12 April, which approves the revised text of the Intellectual Property Law, shall be applicable, GRUP MEDIAPRO may therefore keep the data provided for the duration of the intellectual property rights of the programme, series or any other audiovisual work in which they are incorporated, in accordance with the provisions of such legislation or the provisions that may be approved in the future, which may mean more than seventy years.

Therefore, GRUP MEDIAPRO may store any information relating to the user that enables it to demonstrate that it is the legitimate assignee of the exploitation rights over said audiovisual works, as long as they do not enter the public domain, by virtue of the terms established above or any others established by Royal Legislative Decree 1/1996, of 12 April, which approves the Consolidated Text of the Intellectual Property Law.

11.2.6 PARTICIPATION IN COMPETITIONS, PRIZE DRAWS AND SIMILAR EVENTS.

o Purposes of processing

The data of users who participate in any of the competitions, sweepstakes and similar organized by GRUP MEDIAPRO will be processed for their management and the prevention of fraud during their development, as well as to contact whoever is selected, and, where applicable depending on the initiative, to publicize and promote the content of the initiative, and its exploitation and broadcasting in the programmes, works and audiovisual content produced or co-produced by GRUP MEDIAPRO, as well as on social networks and other GRUP MEDIAPRO channels.

Likewise, GRUP MEDIAPRO will process the data for the purpose of choosing the winner of the competition, prize draw or initiative in question. In these cases, it may be necessary, in order to send the prize to the participant, to communicate the data to third party suppliers of GRUP MEDIAPRO and, in particular, to courier companies for the corresponding delivery and/or dispatch.

Please consult the corresponding bases and/or additional privacy policies made available to users for more detailed information on the processing of your data before participating in any of the above-mentioned initiatives.

In any case, users who participate in any of the initiatives mentioned in this clause guarantee the ownership and control of the rights over the texts, audio recordings, photographs, videos or any other content that they may have sent, that they do not infringe any image, honor,

intellectual and/or industrial property rights or any other rights of third parties and that they respect at all times the regulations on data protection (for more information see clause "3. DATA PROVIDED BY THIRD PARTIES") and shall be liable to GRUP MEDIAPRO or to third parties for any damages that may be caused as a result of non-compliance with the above statements.

o Category of data processed

GRUP MEDIAPRO may process personal data relating to name and surname, telephone number and/or e-mail address, as well as image and/or voice and any other data included in the texts, audio recordings, images, photographs or videos that you may send us.

o Legal basis

The basis for the processing of your data is:

- For the purpose of managing the selection of questions, opinions, queries, audio recordings, photographs, videos or any other content sent to us, depending on the purpose of the initiative developed, and contacting those who are selected, the express consent given through the form or channel enabled for sending the aforementioned content. In the event that it is necessary to accept a legal basis in order to participate, the legitimation will be the contractual or pre-contractual relationship with the user.
- In the case of data processed for the prevention of fraud during the corresponding initiative, the basis that legitimizes the processing is the legitimate interest which has been assessed by GRUP MEDIAPRO, taking into account the weighting with the rights and freedoms of the data subjects, and is based on the provisions of recital 47 GDPR, and can be expected not to exceed the reasonable expectations of data subjects in view of the relationship with GRUP MEDIAPRO.
- For the purpose of producing audiovisual works, artistic creations and, in general, audiovisual content produced or co-produced by GRUP MEDIAPRO, carrying out their promotion, exploitation and broadcasting and their conservation in archives and newspaper libraries, the express consent of the data subject, in accordance with Royal Legislative Decree 1/1996 approving the revised text of the Intellectual Property Law, the L.O. 1/1982, on the civil protection of the right to honor, personal and family privacy and self-image and the GDPR and/or, where appropriate, the execution of the contractual relationship that you may have with GRUP MEDIAPRO. **We inform you that you may revoke your consent at any time** through the same channel established in clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.

o Conservation periods

The information provided to GRUP MEDIAPRO, the data, texts, audio recordings, images, photographs or videos and any content will be kept for the period necessary to fulfil the purposes described in this Privacy Policy and, after this period has elapsed, for the period of limitation of legal actions arising from the aforementioned initiative.

In the event that the contents you submit are selected for broadcast, we may proceed to the widest exploitation of the programme in which they are included and of the contents, by way of example, television exploitation, DVD, through digital or electronic media, Internet and its social networks and new technologies, and by any other means of exploitation (including digital or

electronic exploitation) for the maximum period permitted by the Intellectual Property regulations until their entry into the public domain, as detailed below.

In this regard, if you send content to GRUP MEDIAPRO for the purposes mentioned in this clause, you assign the corresponding exploitation rights of works or content subject to intellectual property rights to GRUP MEDIAPRO, and the provisions of Royal Legislative Decree 1/1996, of 12 April, are applicable, which approves the revised text of the Intellectual Property Law, and therefore GRUP MEDIAPRO may keep the data provided for the duration of the intellectual property rights of the programme, series or any other audiovisual work in which they are incorporated, which may be more than seventy years.

Therefore, GRUP MEDIAPRO may store any information relating to the user that allows it to demonstrate that it is the legitimate assignee of the exploitation rights over said audiovisual works, as long as they do not enter the public domain, by virtue of the terms established above or any others established by Royal Legislative Decree 1/1996, of 12 April, which approves the Consolidated Text of the Intellectual Property Law.

11.2.7 MANAGEMENT OF VISITS.

o Purposes of processing

GRUP MEDIAPRO will process the data of visitors who visit its facilities or locations in order to:

- Adopt the necessary organizational, preventive and logistical measures to guarantee the security of the company, including the use of video surveillance systems. The use of such systems by GRUP MEDIAPRO shall be duly informed by means of informative signs.
- To guarantee the entry to the facilities and locations (hereinafter, jointly, the facilities) in an agile manner in order to avoid crowds at the entrances to them and in their different areas and spaces.
- Reserving and allocating, if necessary, spaces in the cafeterias and canteens and parking spaces.
- Know the number of visitors received and the people who may be in a building in the event of an emergency and, for example, evacuation is necessary.
- Maintain professional contact.

o Category of data processed

GRUP MEDIAPRO will essentially process contact data (first name and surname, e-mail and telephone number) and, where applicable, data relating to the function or position held and the company for which you may provide your services. Likewise, it may also process your ID card for your identification at the accesses to the facilities and your car registration number, in the event that it is necessary to manage a parking space, as well as your image, in the event that it is captured by video-surveillance devices.

o Legal basis

The legal basis that legitimizes the processing of the data are:

- For the purposes of logistical management and security of the facilities, as well as professional contact and for the reservation and allocation of spaces, the legitimate interest. This legitimate interest has been assessed by GRUP MEDIAPRO, taking into

account the necessary balance that the proposed processing activity must present with respect to the rights and freedoms of the data subjects in order to carry it out, thereby overcoming the triple judgement of purpose, necessity and proportionality, and is based on guaranteeing security at its facilities, as well as having an agenda of professional contacts with whom to establish future business relations according to the professional relationship that it maintains. However, the user has the right to object to this processing at any time through the same channel established in the clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.

- For the purpose of managing any emergencies that may occur on its premises, the safeguarding of vital interests and the public interest in the field of public health.

o Conservation periods

Data relating to visits are generally kept for one month from the date of the visit or for as long as necessary to comply with the corresponding legal obligations and to meet any possible liabilities that may arise from the processing of the data.

In the case of professional contact, they will be kept until such time as you express your objection.

11.2.8 RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, COLLABORATORS AND ANY THIRD PARTY.

o Purposes of processing

- The personal data relating to the legal representatives, as well as those of third parties who may be appointed and/or employees, as interlocutors, by the legal persons or professionals with whom GRUP MEDIAPRO maintains a contractual relationship, will be processed by GRUP MEDIAPRO to carry out the management, development, fulfilment and control of the contractual relationship and the invoicing of the corresponding services.
- Likewise, GRUP MEDIAPRO may process said data and those of designated third parties for the provision and development of the contracted services and the assessment of sustainability, financial and compliance risks, as well as for the control and supervision of compliance with the applicable regulations, its policies and procedures and its Code of Ethics available at the following link <https://ethics.mediapro.tv>.
- GRUP MEDIAPRO may also process personal data for professional contact purposes and to send you greetings.
- For the development of any operation of structural modification of companies or the contribution or transfer of a business or branch of business activity.

o Category of data processed

In general, GRUP MEDIAPRO shall process mainly identification and contact data (first name, surname, e-mail and telephone number) and, where appropriate, data relating to the function or position held. However, it may process any other data that may be necessary for the execution of the contractual relationship.

Likewise, in order to verify compliance with its policies and procedures and the Code of Conduct, GRUP MEDIAPRO processes data relating to transactions involving goods and services (goods and services received by data subjects, financial transactions, commercial transactions carried out between individuals or legal entities that have some kind of relationship, whether family, shareholding or shareholding).

We also use internet search engines, media, agencies and databases for the detection of criminal offences and the prevention of fraud and corruption, which provide us with information on Stakeholders' corporate holdings or links to public bodies in order to periodically check for potential conflicts of interest. We also check lists of economic sanctions and trade restrictions to ensure the security of our business relationships.

o Legal basis

The legal basis which legitimizes this processing are:

- For the purpose of the maintenance and management of the contractual or pre-contractual relationship to which the data subject is a party, as well as for invoicing is the execution of the contract or for the application at the request of the data subject of pre-contractual measures.
- For the purpose of maintaining professional contact, this is a legitimate interest. This legitimate interest is based on being able to have an agenda of professional contacts with whom to establish commercial relations in the future according to the needs of the service.
- For the assessment of sustainability, financial and compliance risks in order to ensure compliance with the Code of Ethics of the group Grup Mediapro, internal policies and procedures, legitimate interest. The legitimate interest is based on compliance with the provisions of art. 31 bis of Organic Law 10/1995 of the Criminal Code.
- TThe legitimate interest has been assessed by GRUP MEDIAPRO, taking into account the necessary balance that the proposed processing activity must present with respect to the rights and freedoms of data subjects in order to carry it out, thereby overcoming the triple judgement of purpose, necessity and proportionality. In this regard, GRUP MEDIAPRO processes the minimum data required to fulfil the purposes indicated. However, the data subject has the right to object to this processing at any time through the same channel established in clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.

o Conservation periods

Personal data shall be retained for the duration of the contract and for as long as liability may arise from the performance of the contract.

The data will be kept as evidence of the functioning of the GRUP MEDIAPRO group crime prevention model for a maximum period of twenty (20) years.

11.2.9 REPORT MANAGEMENT.

We process data for the management of reports or investigations in which you may be involved. You can consult all the information on the processing of your data relating to the management

of reports in the Privacy Policy, which is provided at the time of submitting a report together with the Terms of Use, available on the Report Channel at: <https://ethics.mediapro.tv/>.

11.2.10 USE OF ARTIFICIAL INTELLIGENCE.

GRUP MEDIAPRO may use tools and technologies based on artificial intelligence (hereinafter "AI") for the purposes described in this Privacy Policy, including, but not limited to: data analysis, preparation and review of documents, production of audiovisual content and automation of processes.

The use of AI by GRUP MEDIAPRO is subject to a prior evaluation to ensure that it complies with the applicable ethical, legal and contractual requirements, including those related to the privacy and security of personal data.

To this end, and to ensure that personal data remains adequately protected, we have adopted policies governing the responsible use of AI.

11.3 DATA PROVIDED BY THIRD PARTIES .

GRUP MEDIAPRO asks users to avoid communicating personal data of third parties through any system, application, medium or format. However, it is possible that through their profiles on social networks or in order to participate in programmes, series, competitions and any initiatives that may be produced or co-produced by GRUP MEDIAPRO, users may include third-party content for dissemination. In this case, the following must be taken into account:

- The content of third parties must not be disseminated without first informing them of such processing and requesting their prior consent.
- Sharing data of minors should be avoided.
- Under no circumstances shall it communicate content that is violent, offensive, harmful, degrading or, in general, contrary to the law, generally accepted morals and good customs or public order.

If, for the management or performance of a contract, the legal entity or, where applicable, the professional with whom the GRUP MEDIAPRO has a contractual or pre-contractual relationship communicates the data of one or more persons to the latter as an interlocutor in the terms set out in clause "2.8 RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, COLLABORATORS AND ANY THIRD PARTIES", the said legal entity or professional must first comply with the obligations of information and obtaining consent or have another legal basis that legitimises the said communication.

Any user who fails to comply with the above provisions, especially with regard to the data of minors, may incur liability to that third party and to GRUP MEDIAPRO or any other entity of the group Grup Mediapro. For further information, please consult the [Website terms of use](#).

11.4 RECIPIENTS OF THE DATA .

11.4.1 COMPANIES THAT ARE PART OF THE GRUP MEDIAPRO GROUP.

GRUP MEDIAPRO may communicate the data to companies that are part of the GRUP MEDIAPRO group (you can consult the list of entities that are part of our Group at <https://entidades.grupmediapro.tv/> and www.mediapro.tv) for the internal administrative management of the GRUP MEDIAPRO group on the legal basis of legitimate interest. This

legitimate interest is based on the maintenance of a homogeneous internal administration throughout the business group, in accordance with the provisions of Recital 48 GDPR. In any case, the legitimate interest has been assessed by GRUP MEDIAPRO, taking into account the necessary balance that the proposed processing activity must present with respect to the rights and freedoms of data subjects, in order to carry it out, thereby overcoming the triple judgement of purpose, necessity and proportionality. However, the user has the right to object to this processing, at any time, through the same channel established in the clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER" of this Privacy Policy.

In turn, in the event of communicating data to companies that form part of the GRUP MEDIAPRO group for the purposes described in the previous section, international data transfers may be carried out as these companies are located in countries outside the European Economic Area (EEA). You can consult the list of countries in which the group GRUP MEDIAPRO is present at mediapro.tv. In these cases, when personal data is to be communicated outside the EEA, GRUP MEDIAPRO shall ensure that an appropriate mechanism recognized by the applicable personal data protection regulations is applied. In the absence of an adequacy decision pursuant to Article 45 GDPR, GRUP MEDIAPRO shall sign the Standard Contractual Clauses determined in the Implementing Decision 2021/914/EU (hereinafter the "SCCs"), or any other legal instrument updating or amending such Standard Contractual Clauses.

However, in the absence of such clauses, we may carry out international transfers if, having assessed the transfer and the circumstances, there are appropriate safeguards with respect to the protection of personal data and the interests or rights and freedoms of the data subject are not overridden and any of the conditions set out in the GDPR are met, and in particular:

- That you have explicitly consented to the proposed transfer;
- That the transfer is necessary for the execution of a contract between the user and GRUP MEDIAPRO or for the execution of pre-contractual measures adopted at the user's request;
- The transfer is necessary for the conclusion or performance of a contract, in the interest of the user, between GRUP MEDIAPRO and another natural or legal person;
- The transfer is necessary for important reasons of public interest;
- The transfer is necessary for the formulation, exercise or defense of claims;

On the other hand, the purposes for which the data are processed may be carried out by one of the entities of the GRUP MEDIAPRO group, in their capacity as Data Controller or joint controller for the processing if they jointly determine the purposes and means of data processing. In this regard, it will be necessary to carry out the corresponding communication to such entity in question, this communication being necessary to carry out the purpose in question. If this is the case, the user will be informed of this in each case. Likewise, if there is joint responsibility for the processing, a contract will be signed between the parties, the point of contact for the exercise of rights being that set out in clause "6. RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION DELEGATE".

11.4.2 PUBLIC BODIES.

Users personal data may also be communicated, by virtue of a legal provision, to Tax Authorities, Data Protection Control Authorities (e.g. the Spanish Data Protection Agency), Judges and Courts and other public bodies if so required or necessary.

In competitions, promotions, programmes, prize draws or any other initiatives carried out by GRUP MEDIAPRO, the data shall be communicated to television channels or, in general, to communication service providers as broadcasters of the programme, initiative, competition, series, etc., in the event that they are selected for broadcast or if it is necessary for the development of the corresponding initiative, for example, in the case of a competition, the awarding of a prize to the winner. In such cases, the communication of data is a necessary requirement for the execution of the contract and, therefore, if such data is not communicated, the initiative for which it has been selected cannot be carried out.

11.4.3 SUPPLIERS.

GRUP MEDIAPRO also has external suppliers for the development of its activity, the most common of which are those used to provide general or maintenance services (IT services, consultancy, audits, hosting, security, process automation, etc.) and/or for the management and/or development of competitions, prize draws and audiovisual initiatives and/or the production of audiovisual content, as well as marketing campaigns.

Those third parties may be located outside the European Economic Area and in countries that do not offer a level of data protection comparable to the European level, in which case GRUP MEDIAPRO shall verify that the supplier provides adequate or appropriate guarantees to ensure data protection through the existence of binding corporate rules, codes of conduct or shall sign the SCC indicated in clause "4.1) COMPANIES THAT ARE PART OF THE GRUP MEDIAPRO GROUP", or any other legal instrument that updates or modifies said clauses. In the absence of such guarantees, GRUP MEDIAPRO may carry out international transfers if, having assessed such transfer and the concurrent circumstances, there are appropriate guarantees with respect to the protection of personal data and the interests or rights and freedoms of the data subject do not prevail, and any of the conditions described in clause "4.1) COMPANIES THAT ARE PART OF THE GRUP MEDIAPRO GROUP" are met for the international transfers of personal data.

11.5 SECURITY MEASURES.

GRUP MEDIAPRO has implemented the necessary technical and organizational security measures to guarantee the security of your personal data and prevent their alteration, loss and unauthorized processing and/or access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed, whether from human action or the physical or natural environment. To this end, GRUP MEDIAPRO states that it has a network designed to protect information, identities, applications and devices.

In order to guarantee the confidentiality of the information we need the collaboration of the users and, to this end, it is essential that the password to access the Website and the computer or device with which the GRUP MEDIAPRO services are accessed are protected against unauthorized access by third parties.

GRUP MEDIAPRO continuously monitors, controls and evaluates processes to ensure respect for data protection.

11.6 RIGHTS OF DATA SUBJECTS. REVOCATION OF CONSENT. DATA PROTECTION OFFICER.

Users have the following rights in relation to their personal data:

- (i) The right of access to personal data or the right to request from the data controller whether or not the Controller is processing his or her personal data and, if the Controller is processing personal data, the right to obtain, inter alia, the following information: (i) a copy of the personal data which are the subject of the processing; (ii) the purposes of the processing; (iii) the categories of personal data which are processed; (iv) the recipients or categories of recipients to whom the personal data were or will be disclosed, - in particular, recipients in third countries or international organizations; the intended period of retention of the personal data, or if this is not possible, the criteria used to determine this period.
- (ii) The right to have the user's personal data rectified or completed when the Data Controller has inaccurate or incomplete data (for which the user must indicate which data he/she is referring to and the correction to be made, in addition to providing with his/her request the supporting documentation, where necessary).
- (iii) The right to object, in certain circumstances, to the processing of the user's personal data by the Data Controller, in certain cases, for example, where the user's data are processed for the purpose of sending the user commercial communications.
- (iv) The right to erasure of the user's personal data or the right "to be forgotten", which allows users to ask the Controller to erase their personal data when, among others, any of the following circumstances occur: (i) the user's personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) the user withdraws the consent given for the processing of personal data and there is no other reason justifying further processing by the Data Controller; (iii) if the user's data have been processed unlawfully. In any case, users should be aware that it may be feasible not to comply with a request for deletion of data when the processing is necessary for the exercise of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest, for reasons of public interest, in the field of public health, for archiving purposes in the public interest or for the formulation, exercise or defense of claims.
- (v) The right to the restriction of the processing of the user's personal data, which allows the user to ask the Controller:, which allows the user to ask the Controller:
 - (a) the suspension of the processing of his or her personal data - where the user contests its accuracy or in cases where he or she has objected to the processing, under certain conditions; or
 - (b) the retention of data for a specified period - where the processing is unlawful and the user objects to erasure, but requests restriction of processing, or where the Controller no longer needs the data for the purposes of processing, but the user does, in order to raise claims or defend himself.
- (vi) The right to portability of the user's personal data, which entitles the user, where the processing is carried out by automated means, (i) to receive the personal data provided by the user to the Data Controller in a structured, commonly used, machine-readable and interoperable format, and (ii) the user to transmit such data to another

Data Controller, provided that the justification for the processing is the user's consent or the performance of a contract.

- (vii) The right of the user not to be subject to automated individual decisions based solely on the processing of his or her personal data, which implies that the user is entitled to demand not to be subject to a decision based solely on the processing of his or her personal data, including profiling, which produces legal effects on the user or significantly affects him or her in a similar way. This right does not apply where such decisions are necessary for the conclusion or performance of a contract between the user and the Data Controller, or where the processing of the data is based on the prior consent of the user.
- (viii) The right to withdraw consent. Where the legal basis for the processing is consent, the data subject has the right to withdraw or revoke consent at any time. The withdrawal or revocation of consent does not have retroactive effect. Therefore, it does not affect the lawfulness of the processing based on the consent prior to the withdrawal.

To exercise these rights, as well as to contact the Data Protection Officer of GRUP MEDIAPRO for any queries you may have about this Privacy Policy or about how GRUP MEDIAPRO processes your personal data, you can contact them by the following means:

- By post: GRUP MEDIAPRO, Avenida Diagonal 177-183, 08018, Barcelona.
- By e-mail: dpd@mediapro.tv (this e-mail address is for data protection purposes only and no other questions will be answered, in particular CVs, videobooks or, in general, proposals for professional collaboration will be deleted).

In both cases, please indicate as a reference the following: "Ref. Data Protection - WWW.MEDIAPRO.TV".

Without prejudice to the foregoing, GRUP MEDIAPRO may deny those requests for rights that are unfounded or excessive, or charge a reasonable fee based on the administrative costs incurred in providing the information or communication or carrying out the requested action.

In addition to the above, you have the right to lodge a complaint with the Spanish Data Protection Agency (www.aepd.es). You can also consult the supervisory authorities of the European Economic Area at: https://www.edpb.europa.eu/about-edpb/about-edpb/members_es.

11.7 CHANGES

We will review this Privacy Policy periodically to adapt it to any changes that may occur in relation to the processing of personal data or as required by applicable regulations, and we will publish the most up-to-date version on the Website.

You can consult the previous versions of this privacy policy at the following link: [Pervious Privacy Policy](#).

The effective date of our Privacy Policy is posted below.

Date: 17/9/2024

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