

PRIVACY POLICY

LÍNEA DIRECTA GROUP



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1. Purpose

This Policy has been prepared in accordance with 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, and repealing Directive 95/46/EC (hereinafter, the “**GDPR**”), as well as the provisions of Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights. In the event of any inconsistency between the provisions of this Policy and the legislation applicable, the latter shall prevail.

Likewise, this Policy reflects the firm commitment of Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros (hereinafter, “**Línea Directa**”) to ensure and promote the responsible, secure and respectful use of personal data, in such a way that, in addition to ensuring regulatory compliance, it strengthens the framework of trust with customers, shareholders, employees and other stakeholders.

The Board of Directors, in accordance with the provisions of its Regulations, is the competent body for approving the general policies and strategies to which all entities forming part of Línea Directa Group must adhere. Within this framework, it approves this Policy, which ensures homogeneous and coordinated action on data protection and privacy across the Group. This Privacy Policy, together with the Company’s Data Governance Policy and Cybersecurity Policy, strengthens compliance with the applicable legal and regulatory requirements.

2. Glossary of terms

For the purposes of this Policy, the following definitions shall be considered:

- **Personal data:** any information relating to an identified or identifiable natural person. An identifiable natural person shall be considered to be any person whose identity can be determined, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **Profiling:** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s professional performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **Pseudonymisation:** the processing of personal data in such a manner that the personal data can no longer be attributed to a data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.



- Anonymisation: the process whereby data capable of directly or indirectly identifying specific persons are removed, thereby retaining only the type of data that cannot, in any way, be associated with the person who owns such data.
- Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing; where Union or Member State law determines the purposes and means of processing, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- Processor: the natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- Consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- Personal data breach: any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- Data concerning health: personal data related to the physical or mental health of a natural person, including the provision of healthcare services, which reveal information about his or her health status.
- Cookies: small amounts of information stored on the computer, telephone, tablet or any other device used by the user so that the server can remember certain information which may subsequently be used. This information makes it possible to identify you as a specific user and to store your personal preferences, as well as technical information such as visits and browsing time on the website. The use of this information enables the server on which the website is hosted to recognise the browser used by the user, allowing, for example, registered users to access areas without having to register on each visit and to remember their language and country preferences, among others, on future visits. This information may also be used to measure audience and website traffic parameters and to show personalised advertising based on browsing activity.

3. Scope of application

This Policy applies to Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros and to the subsidiaries which, from time to time, form part of the Group, as well as to Fundación Línea Directa (hereinafter, the “**Línea Directa Group**”). Línea Directa's subsidiaries may be consulted on the corporate website.

This Policy is mandatory for the members of the Board of Directors, employees, executives, agents or providers within the “Línea Directa Group” (hereinafter, the “**Individuals subject to this Policy**”). Service providers rendering services to the Línea Directa Group must comply with the principles set out in this Policy.



4. General principles

4.1. Lawfulness, fairness and transparency

All Individuals subject to this Policy shall ensure that the processing of personal data carried out within the scope of their duties complies with the principles of lawfulness, fairness and transparency in relation to data subjects.

The principle of lawfulness requires that any processing carried out by controllers shall, as a general rule, be lawful under the legal framework in force. In particular, for processing to be lawful under the GDPR and other data protection legislation, it must be possible to demonstrate that one of the lawful bases for processing applies and that such lawful basis is being applied in accordance with the applicable requirements.

The Línea Directa Group shall carry out all processing of personal data of data subjects always on the basis of one of the lawful bases provided for by the legislation in force, such as the consent of the data subject, performance of a contract, compliance with a legal obligation, protection of vital interests, performance of a task carried out in the public interest or the legitimate interest of the controller. In addition, the Línea Directa Group shall provide data subjects with appropriate and transparent information on the specific lawful basis supporting each processing of their personal data, providing such information at the time of collection of the data and thereby complying with the information obligations established under data protection legislation.

In order to comply with the principles of fairness and transparency, controllers and/or processors shall provide data subjects with clear, appropriate and sufficient information on the processing of their personal data.

The Línea Directa Group has implemented appropriate organisational measures to ensure that, before commencing any processing that may affect the right to privacy and the right to the protection of personal data, a legal and technical analysis is carried out to determine whether the intended processing is compliant with the legal framework in force, establishing, where appropriate, the lawful basis for processing.

Likewise, the Línea Directa Group complies with the principle of transparency, as it has incorporated into its contracts a data protection clause informing “data subjects” of the manner in which the Group uses their information.

In any event, data subjects are informed of:

- Identity and contact details of the controller.
- Contact details of the Data Protection Officer and how to contact him or her.
- Which personal data are processed and which processing operations are carried out with their personal data, as well as the lawful basis for such processing. They are also informed of the processing operations that are necessary for maintaining the contractual relationship and those that are voluntary, giving them the option to authorise or not authorise such voluntary processing and informing them of how they may manage, at any time, the permissions granted to the Group for the processing of their personal data.
- Retention period for their personal data.
- What their rights are and where they may exercise them.
- Their right to lodge a complaint with the supervisory authority.



- The recipients and categories of recipients of their data.

4.2. Purpose limitation

All processing carried out by the Línea Directa Group complies with the principle of purpose limitation, which means that the following matters must be taken into account in relation to the collection and subsequent processing of personal data:

- The data must be collected for specified, explicit and legitimate purposes.
- Data subjects must be clearly informed of such purposes at the time the data are collected.
- The data may only be processed for the purposes for which they were originally collected.
- Where data are to be processed for purposes other than those for which they were originally collected, data subjects must be informed and the lawfulness of the processing must be validated.

4.3. Data minimisation

Only the data necessary to achieve the defined processing purposes, of which data subjects have been informed, may be collected, stored and processed.

Before commencing any new processing or modifying an existing processing activity, consideration must be given to which data are necessary for the purpose pursued by such processing, and the opinion of the DPO must be obtained on this matter.

In any event, through the organisational measures implemented to carry out the corresponding legal and technical analyses prior to any processing, the Línea Directa Group ensures that only strictly necessary data are processed.

4.4. Accuracy

The data processed by the Group are accurate and up to date. Without prejudice to the rights of erasure and rectification of their holders (hereinafter, “Data Subjects”), the Línea Directa Group adopts reasonable measures to rectify or cancel data that may be inaccurate or inadequate for the purposes for which they are processed. For these purposes, periodic actions are carried out so that Data Subjects may update their data through the various channels made available by the Group for Data Subjects to interact with its companies.

4.5 Storage limitation

At Línea Directa, personal data shall be retained:

- a) For the period strictly necessary to fulfil the purpose for which they were collected.
- b) In addition, the data shall be retained for the period required to comply with applicable legislation, as well as for the time necessary for the filing, exercise or defence of claims, in which case the data shall not be accessible except to comply with such obligations, so that the data shall be voluntarily pseudo-blocked (accessible to the fewest possible persons and only for specific purposes).
- c) Finally, in addition to the foregoing voluntary pseudo-blocking periods, and before erasure or rectification is appropriate, the data shall enter the statutory blocking period in order to comply with Article 32 of the Spanish Organic Law on Data Protection and Guarantee of Digital



Rights, which entails adopting technical and organisational measures to prevent their processing, including their visualisation, except for making the data available to judges and courts, the Public Prosecutor's Office or the competent Public Administrations, in particular data protection authorities, for the purpose of enforcing possible liabilities arising from the processing and only for the limitation period thereof.

4.6. Integrity and confidentiality

Personal data shall be processed in a manner that ensures an appropriate level of security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, through the implementation of appropriate technical or organisational measures.

Those involved in the processing of data shall be subject to a duty of secrecy even after their relationship with the Línea Directa Group has ended.

The Línea Directa Group has a Cybersecurity Policy and a Data Governance Policy which ensure, among others, the integrity, availability and confidentiality of information.

4.7. Accountability

In relation to the processing of personal data, all decision-making processes, measures adopted and procedures carried out shall be documented in order to demonstrate compliance with data protection legislation and the right to privacy, as well as to inform all "Individuals subject to this Policy" of all their obligations.

In particular, the Línea Directa Group has internal procedures which, together with this Policy, form the internal governance framework on privacy matters. These procedures are approved and updated by the Data Protection Officer and published by the Data Protection Office with the aim of ensuring the right to privacy of "data subjects". Such procedures are mandatory for all "Individuals subject to this Policy".

5. Procedure for privacy and data protection management

The Línea Directa Group works to guarantee the right to privacy and data protection of all Data Subjects, focusing, among others, on the following lines of action:

5.1. Privacy by design and by default

In order to ensure the strictest respect for the right to privacy and data protection of Data Subjects from the design stage of any initiative or IT development, the Línea Directa Group shall carry out a privacy impact analysis, taking into account the likelihood that such right may be affected and to what extent, thereby anticipating the materialisation of such risks throughout the entire process.

The DPO, through the Data Protection Office, shall review and approve the privacy impact analysis of the initiative and shall state, where applicable, whether there are initiatives which, due to their scope or impact on privacy, must be escalated in accordance with the Company's internal procedure.

Once the new initiative or processing activity has been approved, the Línea Directa Group shall ensure that all organisational and security measures necessary are adopted to ensure that, once



implemented, the right to privacy of the “data subjects” continues to be respected, carrying out the necessary periodic reviews to ensure that all legal and technical measures defined have been implemented. In this way, secure management of information is ensured throughout its full lifecycle, that is, from the time such information is collected until its final erasure.

Therefore, for the Línea Directa Group, protection of the right to privacy by design and by default forms an intrinsic part of its culture of compliance and respect for the right to privacy.

5.2. Data processing and lawful basis

5.2.1 General processing activities

The contracts entered into by Data Subjects with the Línea Directa Group include a data protection clause providing information on the general processing activities carried out by the Group. Such clause specifies the purposes for which the data are collected and the types of data used.

Likewise, information is provided on: (i) which processing activities are mandatory, as they are linked to contractual performance and compliance with legal obligations; and (ii) which are voluntary or optional. For all processing activities carried out by the Group, the legal basis legitimising each of them is expressly indicated.

5.2.2 Special processing activities

A) General prohibition on the processing of specially protected categories of personal data, except in specific cases

The following are considered special categories of data:

- Data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, or trade union membership.
- Genetic data.
- Biometric data for the purpose of uniquely identifying a natural person.
- Data concerning health.
- Data concerning a natural person’s sex life or sexual orientation.

Controllers subject to this Policy may process special categories of data exclusively in those cases in which the GDPR or applicable sectoral legislation authorises such processing. Specifically, data concerning health may be processed for the purposes of: (i) invoicing medical services by the provider thereof to an insurance entity; and (ii) medical diagnosis, provision of healthcare and management of healthcare services.

In any event, whenever special categories of data are to be processed and, in particular, data concerning health, the DPO shall be consulted and the decision-making process shall be duly documented before commencing the processing.

B) Prohibition on the processing of personal data relating to criminal convictions and offences

Controllers subject to this Policy shall not process data relating to criminal convictions or offences or related security measures, such as precautionary measures.

This prohibition shall not apply to the processing of personal data for the purpose of exercising the right of defence in judicial proceedings in which the controller is involved, always in accordance with



the applicable criminal and procedural legislation, or where a special or sectoral rule provides otherwise or establishes an exception.

5.2.3 Data recipients

The Línea Directa Group shall only disclose Data Subjects' data to other controllers in the following cases:

- Disclosure of data for compliance with a legal obligation.

Data Subjects' data shall only be disclosed to Public Administrations, Authorities and Public Bodies, and Group companies where so required by the applicable regulations.

- Disclosure of data for the performance of the contractual relationship.

For the proper provision of its services to Data Subjects, the Línea Directa Group shall engage various service providers which, in order to provide the service, may need to access the personal data of the "data subjects".

The Línea Directa Group shall ensure that service providers are selected responsibly in order to guarantee full respect for the right to privacy and, specifically, for the personal data protection regulations in force from time to time, and that they accept the principles of this Policy.

- Disclosure of data, where legally appropriate, to special files of the insurance sector.
- Disclosure of data to those entities indicated by the data subject or for which the data subject has given consent, or where there is a legal provision enabling or rendering such transfer lawful.

In any event, whenever any controller subject to this Policy intends to disclose data to a third party, the DPO must be consulted before such disclosure takes place. The DPO shall assess the appropriateness of the transfer, its lawfulness, including the possible need to obtain the consent of data subjects, and the measures that must be applied in order to comply with the requirements set out in the GDPR and in data protection regulations.

5.3. Impact assessments

The Línea Directa Group has a **methodology for carrying out impact assessments** for those initiatives that may pose a significant risk to the right to privacy of "data subjects". Each impact assessment evaluates all risks and analyses and details the measures necessary to mitigate the risks identified, in order to guarantee the right to privacy of all "data subjects".

5.4. Exercise of Data Subjects' rights

The Línea Directa Group shall implement appropriate measures within the organisation to ensure the proper exercise of the rights of access, rectification, erasure, objection, restriction of processing and portability in relation to the personal data of "data subjects".

In compliance with the principle of transparency, the Línea Directa Group informs "data subjects", through personal data protection clauses, where and how they may exercise their rights. They are also informed of their right to lodge a complaint with the competent supervisory authority.



5.5. Technical and organisational measures

The Línea Directa Group shall implement the necessary technical and organisational measures to ensure the confidentiality, integrity and availability of the personal data of all data subjects.

In addition, the Group has a governance framework for data governance and information cybersecurity to prevent risks relating to the alteration, loss, unavailability of, or unauthorised access to, information.

5.6. Notification of personal data breaches

The Group has a **specific protocol for the management and notification of personal data breaches**, in accordance with the provisions of the General Data Protection Regulation (GDPR) and applicable regulations. This protocol governs the following:

- **Notification to the Supervisory Authority:** In the event of a breach that may entail a risk to the rights and freedoms of individuals, the Spanish Data Protection Agency (AEPD) shall be informed within a maximum period of **72 hours** from the time the incident becomes known.
- **Communication to data subjects:** Where the breach entails a **high risk** for the affected persons, they shall be notified clearly and without undue delay, including the measures adopted and recommendations for their protection.

This procedure ensures compliance with legal obligations and reinforces the Group's commitment to the protection of personal data and transparency in incident management.

5.7. Service providers

The Línea Directa Group shall maintain an internal service provider approval procedure which ensures that service providers are only engaged where they offer sufficient guarantees to implement appropriate technical and organisational measures to respect the right to privacy of "data subjects".

All service providers rendering services to the Línea Directa Group shall enter into a contract regulating the obligations and security measures that they must apply in each data processing activity carried out.

As a general rule, the Línea Directa Group only engages service providers that render their services within the European Economic Area. Notwithstanding the foregoing, the Group may engage services rendered outside the European Economic Area and which therefore involve an international data transfer, only where strictly necessary and always with service providers that guarantee that such transfer shall be carried out in accordance with the provisions of the regulations in force and to countries that provide adequate protection safeguards.

In any event, whenever any of the controllers subject to this Policy intends to carry out an international data transfer, the DPO must be consulted before such international transfer takes place. The DPO shall assess the appropriateness of the international transfer, its lawfulness and the measures that must be applied in order to comply with the requirements set out in the GDPR and in data protection regulations.

5.8. Awareness and training

The Línea Directa Group shall prepare and implement a training plan on data protection and privacy addressed to all "Individuals subject to this Policy", the purpose of which is to consolidate a culture of privacy compliance within the organisation. The content and scope of the training for each individual



subject to this Policy shall depend on the degree of involvement that such individual has in the development of personal data processing operations, and different groups of employees may be defined for this purpose, ensuring that all of them have an appropriate level of knowledge of their obligations and responsibilities.

The Data Protection Officer, in coordination with the Group's Training Department, shall be responsible for designing and implementing training actions, as well as for modifying or improving them where necessary.

6. Privacy governance

Privacy governance shall be structured as follows:

1. The Board of Directors of Línea Directa Aseguradora, S.A., as the highest governing body, shall be competent to approve the Group's corporate policies and, therefore, also the Group Privacy Policy, and to supervise compliance therewith.

2. The Audit and Compliance Committee of Línea Directa Aseguradora (CAC), shall be competent to supervise the performance of the functions entrusted to the Personal Data Protection Office. The CAC shall also be informed of the reports and proposals submitted to it by such Office. For these purposes, the Data Protection Officer shall prepare an annual report containing the main activities and noteworthy events of the year, as well as any actions to be carried out, where applicable.

3. The Data Protection Officer (DPO). Línea Directa has appointed a DPO for all the Group. This decision is based on the fact that the entities forming part of the Group are wholly owned and carry out activities related to or supporting the parent company, sharing infrastructure and ensuring, from each subsidiary, easy access to the DPO. The aim is thereby to ensure a harmonised, effective and efficient privacy policy for the entire Group.

In order to perform his or her duties with the highest level of assurance, the DPO shall have direct access and communication with Management and with the Board of Directors, through the Audit and Compliance Committee, whenever required.

The DPO and his or her team, together with the material resources under his or her responsibility, constitute **the Data Protection Office**. The DPO shall have sufficient working time and resources to perform his or her duties.

4. The Risk Committee, as the body responsible for the periodic monitoring of all identified risks, shall also be informed of risks relating to compliance with data protection regulations.

For these purposes, the DPO shall report periodically at the meetings of the Regulatory Compliance Working Group, channelling reports to the CAC through the Risk Committee.

5. Incidents or potential security breaches affecting personal data shall be managed by the **Incident Response Committee**, convened in accordance with the Company's internal rules in force from time to time, of which the DPO shall be a member. Where the breach must be notified to the authorities and/or to data subjects, a report shall be submitted to the CAC and to the Board on the assessment of the incident and the measures adopted.

7. Obligations of Individuals subject to this Policy

All “Individuals subject to this Policy” shall be required to be aware of and comply with this Group Privacy Policy. They shall also have a duty to cooperate in all actions necessary to comply with the Policy and to inform their DPO of any proposal or suggestion they deem necessary to preserve the right to privacy of Data Subjects.

In particular, they shall be required to:

- Comply with the principles and obligations set out in the GDPR and in the applicable data protection regulations.
- Comply with the principles and obligations set out in this Policy, its annexes and any other internal rules or procedures on the matter.
- Respect the principle of confidentiality and, therefore, not unlawfully disclose to third parties personal data processed in the performance of their duties.
- Cooperate with the DPO Office in the performance of its functions.
- Consult the DPO whenever any new processing activity is to be carried out or any activity already being carried out is to be modified.
- Inform the DPO whenever a possible breach of the GDPR, data protection regulations, this Policy or any other internal rules is detected. In particular, the DPO shall be informed where a potential security breach is detected or where, through any channel, a request to exercise rights or any other data protection complaint is received.
- Participate in due time and form in all data protection training actions addressed to their group or department and attend the awareness actions that are implemented.

Individuals subject to this Policy who fail to comply with the obligations set out above shall be subject to the disciplinary, contractual or any other sanctions that may apply.

8. Communication of the Policy

This Policy shall be communicated to the members of the Group through the intranet and shall be made available to the organisation’s stakeholders through the corporate website.

This Policy was approved by the Board of Directors of Línea Directa Aseguradora, S.A. on 29 January 2026.