

# Privacy and Data Protection Policy



## Purpose

The purpose of this Policy is to **establish the procedures to be followed by our Company for the classification and management of the information** it collects, processes, stores, and/or discloses, as well as to establish control measures to identify, control, investigate, and correct possible situations of loss of privacy of information in the Company, promoting the establishment of a culture of compliance, safeguard our reputation and enhancing the values incorporated in the Code of Ethics and Conduct.

## Our Commitments

- To ensure **compliance** at all times **with our ethical principles and current legislation** on personal **data protection**, privileged information (i.e.: market abuse), intellectual and industrial property, as well as company secrets, among others.
- **Provide employees with access to information and its associated assets when required** for the performance of their duties, based on the established framework of authority and classification of information, to treat, store, and/or disclose the information respecting the lawful purposes associated with it.
- Ensure the **adequate classification and protection of information, as well as of our Company's control, information, and communications systems**, in accordance with the procedures established by the Group, guaranteeing the integrity of the information and preventing unauthorized modifications.
- **To treat in a lawful, loyal and transparent manner the personal data collected for specific, explicit and legitimate purposes.** These shall be accurate, adequate, relevant, and limited to the purposes for which they are processed and shall be kept to the extent that they do not allow the identification of stakeholders for longer than is necessary for the purposes of the processing. All appropriate measures, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, shall be established.
- In accordance with the principle of "Accountability" or "Proactive Responsibility," Moeve must apply all appropriate technical and organizational measures to guarantee and be in a position to demonstrate that the processing of personal data is carried out in accordance with the regulations on the protection of personal data.
- Treating **privileged and potentially privileged information with strict confidentiality** and ensuring that unauthorized persons cannot access it. Inside information may not be used or disclosed without authorization.
- **Not to engage in transactions, or induce others such as friends or family members to engage in transactions**, based on insider information, such as buying or selling a stock or option, or canceling a stock order, for ourselves or others.
- **Limit the period of conservation of the information to the requirements established by law** and, in case there are none, on the basis of the procedures established by the Group.
- **Ensure that suppliers** or other third parties that are contracted, and have access to our confidential information, **transfer these principles to their operations.**

The current version of this Policy has been approved by the Moeve Board of Directors on May 19, 2023 and is effective from the moment of its approval.

# Privacy and Data Protection Policy

## Our Commitments (cont.)

- **Collaborate with the agencies that ensure compliance with regulations on personal data protection and market abuse**, among others, in the event any security breach that could jeopardize the confidentiality of the information and impact on **third parties**.
- **Collaborate in good faith and proactively with the investigations and audits that are carried out, as well as the duty to inform the Ethics and Compliance Office of any suspected or actual breach of our ethical principles or applicable regulations**, which may result in criminal sanctions. To this end, we have internal channels developed for this purpose to report possible irregularities to the Audit, Compliance, Ethics and Risk Committee of the Board of Directors, including the Integrity Channel ([moeveglobal.ethicspoint.com](mailto:moeveglobal.ethicspoint.com)).

If you become aware of a security breach regarding personal data or an undue use of them, you must also inform the Data Protection Officer using the established communication channel ([dpo@moeveglobal.com](mailto:dpo@moeveglobal.com)).

## Scope of Application

**This Policy applies to Moeve, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.**

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy.