

Transparency Policy

Contents

1.	INTRODUCTION AND OBJECTIVES	2
2.	PROCESSING SUMMARY TABLE	3
3.	DATA CONTROLLER	7
4.	DATA PROTECTION OFFICER	8
5.	HOW TO EXERCISE YOUR RIGHTS?	9
6.	PROCESSING	11
7.	HOW DO WE COLLECT AND PROCESS YOUR PERSONAL DATA?	16
8.	WHY DO WE PROCESS YOUR PERSONAL DATA?	17
	TALENT SEARCH	17
	SELECTION PROCESS	17
	NEWSLETTERS AND COMMUNICATIONS	18
	QUERIES, COMPLAINTS, CONTACT	18
	SUPPLIERS AND CUSTOMERS	19
	SOCIAL NETWORKS	19
	BLOG	19
	MARKETING	19
	STAKEHOLDERS	19
	RESEARCH AND PROCESS IMPROVEMENT	19
	COOKIES	20
9.	WHAT IS THE LEGAL BASIS FOR EACH OF THE PURPOSES?	20
10.	WHO CAN ACCESS YOUR PERSONAL DATA?	22
11.	INTERNATIONAL DATA TRANSFERS	24
12.	SECURITY	25

1. INTRODUCTION AND OBJECTIVES

Our Privacy and Transparency Policy is based on nine common pillars.

- Why do we process your personal data and information that we may collect directly or indirectly? What sources or processes do we use to collect and, if applicable, process personal data?
- For what purpose(s) or reason(s) do we process the personal data you entrust to us?
- Whether there is a need to process your personal data, as well as the information associated with or derived therefrom.
- What legal basis do we adopt to be able to process your personal data and, therefore, the need or exemption to obtain your consent?
- For how long can we process your personal data?
- Whether there are third parties or recipients who can access or process such personal data.
- Whether, for the processing of your personal data and associated information, we need to transfer them outside Spain, as well as analyse and forecast possible risks associated with the guarantees we adopt.
- The mechanisms you have to control, emphasising the inherent possibility of exercising your rights, including the possibility of contacting our DPO as an independent person of contact to help you in any situation that may affect you.
- What do we do to protect and guarantee the trust placed at both the technical and organisational levels?

We encourage you to read our privacy policy in order to be aware of all the information that may affect you. Similarly, you can have an overview through the infographic that we have published on our Website.

2. PROCESSING SUMMARY TABLE

<p>Data Controller</p>	<p>Grupo CATENON CATENON, S.A. A82539636</p>
<p>Address</p>	<p>Paseo de la Castellana, 93 - 11ª Planta Edificio Cadagua 28046 Madrid</p>
<p>Purpose</p>	<p>Below are the various purposes for which we can process your personal data as a source of origin on our website or social network accounts linked to CATENON.</p> <ul style="list-style-type: none"> • CONTACT. Communication with the group through the different means at your disposal: postal address; e-mail address; forms; social networks or platforms; and blog. • NEWSLETTERS AND BULLETINS. Management of sign-ups and traceability of users who wish to receive newsletters or communications that we edit. • CANDIDATES. Registration and Management of the selection processes carried out by CATENON. This includes the processing of personal data and information generated or linked to the candidate, including remote filming and access by the entity(ies) in the sector(s) offering the candidature. • CUSTOMERS-SUPPLIERS. Management of the relationship with customers and suppliers required under a contractual relationship for the purpose of providing the service or activity developed by the group. • MARKETING AND ADVERTISING. Target segmentation to carry out campaigns related to the group through the applications associated with the different networks or social platforms of which CATENON is part. We comply with anti-discrimination policies and do not process personal data, but rather data that allows us to identify. • STAKEHOLDERS. Information related to the different stakeholders with which CATENON is related, especially in relation to shareholders, suppliers, agents, communication.

	<ul style="list-style-type: none"> • RESEARCH. Study, evaluation and improvement of CATENON’s selection processes. • COOKIES associated with the Website in relation to which information is available through a link for this purpose.
Legal Basis	<p>We process personal data under the following GDPR legal bases</p> <ul style="list-style-type: none"> • Article 6(1)(a) GDPR. Consent of the data subject. • Article 6(1)(b) GDPR. Execution of contract or pre-contractual measures. • Article 6(1)(c) GDPR. In compliance with legal obligations. • Article 6(1)(f) GDPR. Satisfaction of legitimate interests of CATENON and third parties.
Exercise of Rights	<p>The rights of access, rectification, opposition, deletion, limitation, portability can be exercised by sending an email to the following address:</p> <p style="text-align: center;">lopdc@catenon.com</p> <p>You can also exercise these rights by contacting us through our postal address.</p> <p>In certain cases, you will be required to provide proof of identity by means of a photocopy of your accrediting identity document.</p>
Withdrawal	<p>Free of charge at the request of the affected party, except in those cases in which the regulations affect the group’s activity.</p> <p>Said gratuity will affect the cancellation and/or registration of CATENON’s informative and communication bulletins.</p> <p>The purpose(s) and legal basis affected will determine the continuity of the processing, and in any case the personal data will be blocked, especially in the case of exercising the rights of suppression and rectification.</p>
Storage	<p>The personal data will be kept for the minimum period necessary, this being established by the regulations that affect the possible responsibilities arising from the processing and activity(ies) associated therewith.</p> <p>Storage for the purposes of the right of rectification or deletion shall oblige the blocking of personal data for the purposes of any possible liabilities arising from the processing and only for the period of limitation thereof.</p> <p>Personal data may be kept for research purposes and to improve selection processes.</p>

<p>Data Protection Officer</p>	<p>We have a Data Protection Officer duly notified to the Spanish Data Protection Agency, and you can direct your queries, claims or any other communication regarding data protection to the following e-mail address: dpo@catenon.com</p>
<p>Recipients</p>	<p>The companies of the group that make up CATENON, as well as our international collaborators. Our clients as applicants for selection processes. Our service providers. National and supranational bodies under legal imperative or upon request.</p>
<p>Claims</p>	<p>You may send your data protection claims to our Data Protection Officer and to the Spanish Data Protection Agency or control authority linked and/or associated with the processing of personal data. The link to the Spanish supervisory authority is included. www.agpd.es</p>
<p>Data Communication</p>	<p>The companies of the CATENON group</p> <ul style="list-style-type: none"> • Catenon Iberia, S.A.U. • Innovaciones para la gestión de personas, S.L. • Catenon, S.A.R.L. • Catenon, A.P.S. • Catenon, GMBH • Catenon Servicios de Contuloría, Formacao e Recrutamento em Recursos Humanos, LTDA. • Hub Innova & Talento SA de CV • Catenon Insan Kaynaklari ve Danismalik, S.L. <p>To the recipients mentioned in the legitimate interest of the request for information or execution of the service provided, as well as any communications protected by law.</p>
<p>International transfers</p>	<p>CATENON will always process your data under the guarantees and requirements established by the European Data Protection Regulation and the current Organic Law 3/2018. To this end, CATENON has adopted BINDING CORPORATE RULES (NCV), which regulate the transfer of personal data in the group's environment. Similarly, certain service providers for whom adequate privacy guarantees are available, such as adherence to the Privacy Shield (USA) Similarly, our service providers have adequate security measures such as ISO 27000 certifications.</p>

<p>Security</p>	<p>CATENON implements organisational and technical measures in order to ensure the security of personal data and prevent its unauthorised alteration, loss, processing or access.</p> <p>We care about confidentiality, integrity and availability of information. The security measures adopted by virtue of the risks include a process of verification, evaluation and regular assessment of the effectiveness of these measures, both technical and organisational, associated with the processing of personal data and information linked and/or associated with them.</p>
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3. DATA CONTROLLER

The data controller will be Grupo CATENON through CATENON, S.A. with Tax ID (CIF) A82539636 and address at Paseo de la Castellana, 93 (Edificio Cadagua) - Planta 11ª with postcode 28046, Madrid, except in the cases of processing for which it is indicated otherwise.

You can contact us for any query, suggestion or comment in relation to our privacy policy through the following means of communication:

Postal Address: Paseo de la Castellana, 93 - 11ª Planta (Edificio Cadagua)
28046 Madrid (España)

E-mail: lopd@catenon.com

Telephone: (+34) 913 096 980

Similarly, we provide you with a [contact form](#)

4. DATA PROTECTION OFFICER

Our Data Protection Officer (DPO) will act independently both as a contact person with national and regional control authorities and with those affected by possible violations that could affect the rights of those, ensuring compliance with respect to privacy.

Similarly, any query, clarification and, even, suggestions and complaints regarding the privacy policy and processing of personal data carried out by CATENON may be directed to the account expressly linked to our DPO dpo@catenon.com and, and also through our postal address.

Our Data Protection Officer is accredited and, to this effect, designated and notified to the national control authority (Spanish Data Protection Agency).

5. HOW TO EXERCISE YOUR RIGHTS?

In accordance with the European Data Protection Regulation and Organic Law 3/2018 on the Protection of Personal Data, you will always have the right to exercise the rights recognised to you as the owner of your personal data. In some cases, this exercise will require verification of identity by means of identity documents. It is important that when you intend to exercise any of your rights, that you know and choose said right by virtue of its purpose and characteristics. To this end, we provide you with a definition of each of these rights.

Right of Access. You will be able to obtain confirmation as to whether or not CATENON is processing your personal data, as well as the possibility of obtaining information, among other aspects, on: (i) the various purposes and category of data; (ii) the categories of recipients to whom your personal data are communicated and whether such communication concerns international transfers; (iii) the storage period; (iv) the origin in cases where your personal data have not been obtained directly. CATENON will provide a copy of the processing of the personal data.

Right of Rectification. You have the right to update your personal data if you consider that they are inaccurate and even to complete or add those in virtue of the purposes for which they are processed. This rectification may also be carried out ex officio by CATENON when it has reliable evidence of the inaccuracy under the principle of quality of personal data.

You will be able to communicate any rectification to us and send us e-mails to the address lopd@catenon.com or by means of the form included on the Website.

Right of Deletion. You may ask us to delete your personal data without undue delay, although this right may be affected depending on the legal basis associated with the purpose of the processing. In any case, CATENON will inform you of the reasons why it will not be able to delete your personal data, although it will be obliged to block them when the rectification or deletion takes place. In certain cases, such as contractual or pre-contractual relations, as well as for research and process improvement purposes together with responsibilities derived from the processing or, by virtue of legitimate interests, your data will be deleted by us although the necessary technical and organisational measures will be adopted to prevent the processing for those purposes that have derived from the processing.

Right to Limitation of Processing. You have the right to request CATENON to restrict the processing of your personal data in the following cases: (i) If you have challenged the accuracy of your personal data and we have to verify the accuracy thereof; (ii) If you consider that the processing of your data is being carried out illegally and you oppose its deletion and, to this end, demand, instead, the restriction of use; (iii) CATENON does not need your personal data to process the data but you need them to formulate or exercise affected claims; (iv) During the period of verification of the legality of the processing if you have opposed it.

The present right, for example, will be applied when you ask us for a processing limitation on the information we have, although this exercise may mean the impossibility of continuing in selection processes in which you were involved until the final decision. Also, CATENON by default will limit the processing of your personal data that may originate from external sources until you make a free and voluntary decision (for example, future candidate).

Right of Opposition. You have the right to express your disagreement to the processing of personal data. You can also oppose the sending of communications, particularly commercial communications, by CATENON. To this end, we request your consent to proceed with the registration of such communications, as well as the inclusion of the opt-out procedure, at any time, through the communications we send you. The opposition will not be effective when such communications are necessary by virtue of the service or legitimate interest related to the purpose of the communication.

Right to Portability. Provided that the processing does not affect intellectual property rights, industrial or trade secrets and we can send them to another processor of personal data on the basis of consent or in the framework of the execution of a contract when such personal data are in structured format, commonly used, machine-readable and interoperable.

Right to withdraw consent. You have the right to refuse the processing of your personal data for personal reasons or for direct marketing purposes.

Right not to be the subject of automated individual decisions. CATENON does not intend for your personal data and associated information to be the sole basis or object for decision-making and, therefore, may be discriminatory or may produce legal effects. However, this right does not apply when:

- It is necessary for the execution of a contract.
- Processing is based on prior consent.

CATENON does not adopt automated decisions on the data it processes, but those that require human intervention (experts in selection or recruitment processes) for the determination or individualised object in each case.

Right to lodge a complaint with a supervisory authority. Grupo CATENON has its head office on Paseo de la Castellana, 93 - 11ª Planta (Edificio Cadagua) with postcode 28046, Madrid. To this end, the competent control authority is the Spanish Data Protection Agency (AEPD), since the purpose and means of processing your personal data is conformed by that entity.

In order to make a claim as a consequence of rights conferred in terms of privacy or in relation to possible breaches of personal data protection regulations, you may contact the AEPD through the following link <https://sedeagpd.gob.es/sede-electronica-web/vistas/formNuevaReclamacion/limeTurvey.jsf> or by visiting the office of said control authority:

Agencia Española de Protección de Datos
 C/ Jorge Juan, 6
 28001-Madrid
 Telephone: 901 100 099 / 91 266 35 17

6. PROCESSING

In order to provide transparency to stakeholders with regard to the processing of personal data, CATENON provides the mandatory information associated with the main processing activities under Articles 5, 12, 13 and 30 GDPR.

Activities	PRIVACY INFORMATION
CONTACT	<p>Purpose: Resolution of the query that you have submitted to us through the form.</p> <p>Legal basis: Consent under Article 6.1 a) GDPR, which may be based on legitimate interest under Article 6.1 f) in the event that CATENON has to communicate for reasons associated with its activity or the provision of services or in the interest of so-called stakeholders.</p> <p>Storage: A maximum of 12 months or, failing that, unless the data must be kept in order to attend to possible claims or to avoid responsibilities</p>

	<p>or compliance with legal requirements, in which case they will be deleted after the completion thereof.</p> <p>Recipients: Associated service providers in their capacity as data processors (Internet Service Providers - ISPs).</p> <p>International transfers: The companies of the group, some of which are outside the European Economic Area with the aim of resolving communications that may affect them.</p>
<p>NEWSLETTER</p>	<p>Purpose: Referral to our recipients of those bulletins or communications that we edit. Each company that makes up the group will send the reference communications to your list of recipients. An analysis of data related to these communications will be carried out by the service provider that we use for the distribution of these communications. More information on this subject can be found at https://mailchimp.com/legal/privacy/</p> <p>Legal basis: Consent of recipients who register through our registration form under Article 6.1 a) GDPR or in the legitimate interest pursued by the data controller under Article 6.1 f).</p> <p>Storage: Until you decide to object at any time to the receipt of newsletters or electronic communications, that is, we will process your email for that purpose until you allow us to process it.</p> <p>Recipients: MAILCHIMP (Rocket Science Group LLC).</p> <p>International transfers: Yes (United States). Adhesion to the Privacy Shield as a protocol guaranteeing privacy.</p>
<p>CANDIDATES</p>	<p>Purpose: Recruitment processes and selection of professional profiles by virtue of job offers from different sectors of activity.</p> <p>Legal basis: Contractual relationship by virtue of article 6.1 b) GDPR, which may be based on legitimate interest in accordance with article 6.1 f) in the event that CATENON should communicate in relation to the selection and recruitment processes, as well as for the sending of bulletins related to the services, events and selection processes in the interest of the candidates.</p> <p>Similarly, by virtue of article 6.1 c) to comply with legal obligations arising from contractual execution or imposed by law affects the activity of CATENON.</p> <p>Storage: The personal data will be processed until the contractual termination, and will be blocked and subsequently processed in order to attend to possible claims or to avoid responsibilities or compliance with legal requirements, in which case they will be deleted after the completion thereof.</p> <p>The maximum storage period after contractual termination is up to 10 years, and data may be processed a posteriori for research purposes and improvement in the interest of candidates and clients in relation to the processes of recruitment and selection of professional profiles.</p> <p>Recipients: The providers of associated services in the capacity of data processors for the assurance of information, as well as the entities that</p>

	<p>make up the CATENON group together with collaborators and agents by virtue of the geographical location of the job offers and in order to effectively manage them together with the clients who are the object of the selection process.</p> <p>International transfers: The companies of the group together with collaborators and agents, as well as the clients object of the process of selection, some of them being based outside the European Economic Area, with the purpose of managing the contractual relation.</p>
<p>STAKEHOLDERS</p>	<p>Purpose: For the attention of the stakeholders with which the CATENON group is related.</p> <p>Legal basis: Contractual relationship by virtue of article 6.1 b) GDPR and in legitimate interest according to article 6.1 f) in case CATENON should communicate for reasons associated with your activity or the provision of services or in the interest of the so-called stakeholders.</p> <p>Storage: A maximum of 12 months or, failing that, unless the data must be kept in order to attend to possible claims or to avoid responsibilities or compliance with legal requirements, in which case they will be deleted after the completion thereof.</p> <p>Recipients: Associated service providers in their capacity as data processors (Internet Service Providers - ISPs).</p> <p>International transfers: The companies of the group, some of which are outside the European Economic Area with the aim of resolving communications that may affect them.</p>
<p>RESEARCH</p>	<p>Purpose: Processing of functional, statistical and analytical data to improve the recruitment and selection process.</p> <p>Legal basis: By virtue of legitimate interest in accordance with Article 6.1 f) GDPR, not affecting the rights and interests of those concerned.</p> <p>Storage: If personal data are processed, they will be pseudonymised or anonymised, and they will be kept in accordance with their quality.</p> <p>Recipients: Technology Service Providers</p> <p>International transfers: The confidentiality and security of such technology service providers are not foreseen and, if necessary, will be guaranteed under due diligence.</p>
<p>CUSTOMERS</p>	<p>Purpose: Execution of the contractual relationship to manage the processes of selection and recruitment of professional profiles for all third parties of diverse activities based on the requirements and specifications of the job offers.</p> <p>Legal basis: Contractual relationship by virtue of article 6.1 b) GDPR and in legitimate interest according to article 6.1 f) in case CATENON has to communicate for reasons associated to the recruitment and selection service.</p> <p>Storage: Until the end of the contractual relationship and to attend to possible claims or to avoid responsibilities or fulfilment of legal</p>

	<p>requirements, in which case they will be deleted after the completion thereof.</p> <p>Recipients: The associated service providers, in their capacity as data processors for the assurance of information, as well as the entities that make up the CATENON group together with collaborators and agents by virtue of the geographical location of the client and efficient management of the information of the candidates that are the object of the selection process.</p> <p>International transfers: The companies of the group together with collaborators and agents, as well as the clients object of the process of selection, some of them being based outside the European Economic Area, with the purpose of managing the contractual relation.</p>
<p>SUPPLIERS</p>	<p>Purpose: Management of all suppliers of the CATENON group.</p> <p>Legal basis: Contractual relationship under article 6.1 b) GDPR and in legitimate interest under article 6.1 f) in case CATENON should communicate for reasons associated with the contractual relationship.</p> <p>Storage: Until the end of the contractual relationship and to attend to possible claims or to avoid responsibilities or fulfilment of legal requirements, in which case they will be deleted after the completion thereof.</p> <p>Recipients: The providers of associated services in the capacity of data processors for the assurance of information, as well as the entities that make up the CATENON group. International transfers: The companies of the group, some of which are outside the European Economic Area, for the purpose of managing and resolving incidents or any other area related to the commercial relationship itself.</p>
<p>MARKETING</p>	<p>CATENON can process data for marketing purposes (inbound or outbound) with respect to affiliation programmes (leads) or through the functionalities of platforms or social networks. CATENON does not carry out such processing on the basis of personal data but on the basis of non-discriminatory segmentations on different categories of interests or other areas of interest by virtue of the service.</p> <p>It will only carry out inbound marketing if it has more information in the Newsletter.</p>
<p>SOCIAL NETWORKS</p>	<p>Purpose: Interact according to the policies of social platforms.</p> <p>Legal basis: By virtue of legitimate interest in accordance with Article 6.1(f) GDPR.</p> <p>Recipients: No third party will have access through CATENON to your user data of the social platform.</p> <p>Storage: We will retain your data only for as long as necessary to be able to interact with you. We inform you that each platform or social network has its own policy and configuration, so we recommend reading and adjusting your profile.</p>

	<p>International Transfers: By virtue of the company associated with the social network or platform. CATENON does not make transfers to these companies.</p>
<p>COOKIES</p>	<p>Purpose: Functional, statistical and marketing purposes. Legal basis: Consent and legitimate interest. Storage: That expressly indicated in each one of the cookies that are detailed in its corresponding section. Recipients: Associated service providers as data processors. International transfers: Yes. Additional information: Access to the links of third party cookie managers that are stored for this purpose. Rights: Configuration under the parameters that we recommend for the storage, conservation and deletion of cookies.</p>

7. HOW DO WE COLLECT AND PROCESS YOUR PERSONAL DATA?

CATENON's main purpose is to search for talent worldwide so that they can take part in selection processes (recruitment) of different entities in multiple sectors through our RPO model, which allows us to streamline and provide higher quality expectations of candidates and bidding entities.

CATENON can collect personal data and associated information of the candidate either directly or indirectly through internal and external sources:

- **DIRECTLY:** The candidate expressly accepts to be part of CATENON and, consequently, to be part of specific open processes or that could be opened in the future by virtue of your profile.
- **INDIRECTLY:** The candidate expressly accepts to be part of CATENON after searching and evaluating the characteristics associated with a specific offer of entities or under the need to recruit for possible selection processes.

Irrespective of how the information is obtained, it is essential for the candidate to be accepted in order to take part in CATENON selection processes that are in force or that may be carried out in the future.

- **FROM INTERNAL SOURCES:** Through the direct communication of the candidate, that is to say, using the media owned or authorised by CATENON so that the candidate forms part of the selection processes.
- **FROM EXTERNAL SOURCES:** Through third party job search platforms in which CATENON reproduces multiple offers from entities associated with different sectors of activity. Likewise, through technological tools, own or third parties, with respect to which information is obtained from possible candidates who may be interested in selection processes, being external sources (public profiles and professional platforms)

In any case, the candidate will always obtain from CATENON the necessary transparency and information so that, by virtue of it, he or she may decide freely, voluntarily and expressly to form part of CATENON and of the different selection processes which, by virtue of your profile and curriculum vitae may be of interest in relation to the offers of requesting entities.

8. WHY DO WE PROCESS YOUR PERSONAL DATA?

The information that we may process with respect to an identified or identifiable individual will be processed for the following purposes, which may be independent of each other or complementary.

TALENT SEARCH

CATENON, in its RDP (talent search) process, can obtain information from internal sources, either by being existing candidates or by direct interest through CATENON's platforms or through its delegations or international collaborators belonging to the group. Similarly, it can obtain information about potential talent either through employment platforms or through professional platforms. Irrespective of the source of origin, it is necessary for possible talent to confirm its interest through the different mechanisms made available by the entity itself.

The personal data and information associated with the search for talent may come, for example, from the following sources, although it will ultimately be in the interest of the talented person to take part as a CATENON candidate and, consequently, from specific selection processes or those that may be carried out in the future.

- Employment Platforms, such as Infojobs; Iberempleos and Indeed.
- Third-party platforms, such as LinkedIn and Glithub.
- Talent search professionals.
- Data analysis service providers.
- Consultants and technology providers.

SELECTION PROCESS

After the interest shown in CATENON to form part of its selection assets for third parties (entities from different sectors of activity) we will process different information obtained exclusively to be processed during the selection process to which you were assigned or interested.

What information may we ask for or obtain from you?

- Personal data associated with identifying you (name, surname, e-mail, profession, telephone and other associated or related information).
- Curriculum Vitae that you send us for the selection process in which you are interested in participating.
- Letter of Recommendation.
- Assessment tests relevant to the selection process, including aptitude or psycho-technical tests.
- Video interview (image and voice) of the candidate. To this end, CATENON will inform, beforehand, about this processing and the aspects affecting it.
- Other information under the selection process. For certain selection processes, information may be requested concerning working life, economic conditions, criminal records or other necessary/obligatory information under the selection process.
- Likewise, all the information we need can be validated and verified at any stage of the selection process (references, experience, qualification or other similar.)

NEWSLETTERS AND COMMUNICATIONS

CATENON designs and reproduces content to be edited in our bulletins (newsletter) or promotional or non-promotional communications (informative), which are sent to the list of recipients of the entities that make up the group. These recipients may range from our own clients and/or suppliers to those users who have given us their consent for the sending of these communications or candidates who are part of the selection processes with a legitimate interest.

These communications are sent through our service provider MAILCHIMP adhered to the Privacy Shield, carrying out on such communications monitoring and analysis with respect to openings, rejections, cancellations, content accessed, resendings and others related to the purpose of improvement and analysis of behaviour with regards to such communications. We include a link to MAILCHIMP's privacy policy for your information.

<https://mailchimp.com/legal/privacy/>

QUERIES, COMPLAINTS, CONTACT

You may contact us at any time with any queries, complaints or other notifications. These communications will be attended by CATENON with legitimate interest and, especially, to give you an answer with the greatest brevity and quality. We do not intend to share personal data with third parties. Any specific request which may concern a third party shall be dealt with in accordance with data protection rules and regulations.

SUPPLIERS AND CUSTOMERS

CATENON processes the personal data associated with our clients or suppliers with the only purpose of being able to execute, develop, implement, and design the contractual or commercial relationship. The purpose of the processing is twofold: To process the data necessary for professional localisation and as a means to maintain professional relations; and to correctly execute the legal relationship that affects the service or collaboration. Likewise, on the basis of the legitimate interest or consent that you have given to any of our employees or collaborators the possibility of sending you our bulletins or communications of the group.

SOCIAL NETWORKS

CATENON has profiles on various social networks and platforms, such as: Facebook; YouTube; LinkedIn; Twitter and Instagram, through which contents of ownership or interest are reproduced with the purpose that the users of said platforms can interact or view said contents. We use these networks or social platforms as a meeting point with our followers or users interested in our content and can interact through the different options provided by these networks or social platforms.

BLOG

CATENON reproduces contents of interest related to its own activity and that of the sector through its blog, in which, in addition to being able to gain access to them, you will also be able to share your impressions and opinions freely. To this end, you must only respect the recommendations aimed at avoiding comments that could be offensive or harmful to other users and provide us with certain information to be filtered and, where appropriate, published.

MARKETING

CATENON can process data for marketing purposes (inbound or outbound) with respect to affiliation programmes (leads) or through the functionalities of platforms or social networks. CATENON does not carry out such processing on the basis of personal data but on the basis of non-discriminatory segmentations on different categories of interests or other areas of interest by virtue of the service.

STAKEHOLDERS

CATENON processes personal data in relation to its stakeholders, such as: shareholders, suppliers, customers, candidates with the legal purpose associated with the group's own activity, as well as in relation to possible own or legal communications that could affect them.

RESEARCH AND PROCESS IMPROVEMENT

CATENON will process data associated with the different processes and methodologies it carries out in order to improve them and be able to offer greater quality and improve development in order to have an impact on the interests of candidates and clients. Such processing is carried out with legitimate interest, having carried out an assessment of the impact in relation to the perspectives of those affected with respect to the original processing, considering that the processing is for the benefit of those affected without restricting or limiting their rights and freedoms in the recruitment and validation of selection processes.

COOKIES

For the correct functioning of the Website and the reproduced contents, cookies are added to your computer or resource when you connect and access the Web. Cookies are small text files that are stored on your browser or device through websites, applications, online media and/or advertisements.

Further information is available in the section set up for this purpose.

9. WHAT IS THE LEGAL BASIS FOR EACH OF THE PURPOSES?

The processing of personal data and information associated with the identification carried out by CATENON for the various processing activities is justified in the following legal bases, which are broken down for your knowledge and by virtue of the principle of transparency, in accordance with article 6 GDPR.

When you decide to form part of CATENON to opt for or be part of selection processes, you do so on the basis of conditions that regulate your incorporation and management of the former. Therefore, the processing of your personal data is based on Article 6.1 b) GDPR insofar as such processing is necessary for the performance of a contract to which you will be a party or for the application of pre-contractual measures. To this end, we inform you that your incorporation and the services we provide are free of charge. We will process personal information in order to assess your candidacy; inform you about processes that may fit your profile; communicate any management that affects your profile or the processes in which you are involved; require additional information that we need by virtue of the characteristics of the selection process; audio recording and voice of job interviews; availability to third parties (entities in the sectors offering jobs) of the assessments and information necessary to complete the selection process; to send you information from third parties necessary to complete the selection process; to manage the communications you can send us in relation to our services or open processes; to send you communications based on your status as a candidate necessary to manage the selection processes or by virtue of the service we provide you.

CATENON in legitimate interest according to article 6.1 f) GDPR will be able to process your personal data on the basis of satisfying said interest by CATENON or by third parties. To this end, CATENON has determined certain legitimate interests to process your personal data, highlighting the following: the verification and validity of the information processed; avoiding fraud in selection processes; evaluations affecting the characteristics of candidates;

improvements in processes and research; performance and improvement of our applications, including the Website; controlling and guaranteeing our processes.

Similarly, the legitimate interest would include the communication(s) that you send us in any of your capacities (candidates, third parties, customers, suppliers, collaborators, etc.). Also, the processing of functional cookies and improvement of our Website or communications that we can reproduce on the various social platforms that we manage through our associated accounts.

CATENON may process your personal data based on your consent - article 6.1 a) GDPR - for those processing activities directed or intended to offer or provide you with complementary or specific purposes. For example, the possibility of sending you our newsletters (commercial or informative of our services.) This consent will not be necessary by virtue of the commercial or service relationship that you have subscribed with CATENON, although you will always be offered the possibility of opposing to be recipients of such communications.

Finally, CATENON will process the personal data for legal imperative or for legal obligations that we have to fulfil or take care of by virtue of article 6.1 c) GDPR. These include the defence of possible claims of responsibilities affecting the selection processes by third parties or the recruitment processes and selection processes themselves; compliance with national or supranational supervisory bodies; jurisdictional authorities; or in compliance with legal obligations in the labour, tax or other areas to which we have to give express and fulfilled compliance.

10. WHO CAN ACCESS YOUR PERSONAL DATA?

There are several cases in which third parties may carry out processing activities with respect to your personal data, listing the categories of recipients, all of them necessary to carry out the various purposes listed in this document.

Entities that make up the CATENON group with the aim of managing the recruitment and management of the different international selection processes. The entire processing of personal data is carried out from the head office in Spain, although the relationship with the different entities that make up the group is necessary in order to effectively manage the processes of recruitment, selection and relations with third parties.

- Catenon Iberia, S.A.U.
- Innovaciones para la gestión de personas, S.L.
- Catenon, S.A.R.L.
- Catenon, A.P.S.

- Catenon, GMBH
- Catenon Servicios de Contuloría, Formacao e Recrutamento em Recursos Humanos, LTDA.
- Hub Innova & Talento SA de CV
- Catenon Insan Kaynaklari ve Danismalik, S.L.

Third party entities (job offerors) that request from CATENON the recruitment of candidates by virtue of the characteristics they demand. These third parties will be able to access information on the candidates within the selection process in order to be able to know the status of the processes, as well as the information we obtain both from the candidate(s) themselves who are part of the process and from the tests and assessment associated with that process. We disclose your information (access) to these entities during the selection process in order to share information with them for proper decision making.

The entities or service providers necessary both for the assurance of personal data and associated information and for the sending of electronic bulletins or associated communications. These entities or service providers are necessary for CATENON to manage the processing of personal data. Among these entities, the following stand out

- Uniway. An entity providing technology services with respect to which the safety of the same has been assessed, informing that it has ISO 27001:2014 certification.
- Malichimp (The Rocket Science Group LLC). Platform for electronic communications remission. Through this entity we can track shipments and statistics associated with them. The use of this entity implies an international transfer although it is adhered to the Privacy Shield, making available to you the privacy policy: <https://mailchimp.com/legal/privacy/>

Trusted third parties who, by virtue of the selection process of our clients and the characteristics demanded, we need to turn to in the interest of our clients.

Third parties required by virtue of obligations arising from the group's own activity and by virtue of legal obligations, such as auditors.

To this effect, CATENON informs you that it does not allow the processing of personal data and associated information, including the sharing thereof, except when it is necessary to meet the needs of the activity of the group or for the purposes described, requiring certain operators or service providers, in respect of which CATENON performs both an initial assessment and continuous controls, internal and external, to ensure compliance and security with respect to the processing of personal data.

11. INTERNATIONAL DATA TRANSFERS

It is increasingly necessary to diversify the media in the technological world requiring third party providers not only to provide you with quality content but also to preserve security. Similarly, our international activity involving recruitment and selection processes makes it necessary for both the companies that make up the CATENON group as well as those collaborators and agents who relate to the clients offering work and even with the candidates themselves from anywhere in the world to have quick, secure and reliable access to the information we deal with.

For this reason, CATENON demands internal and external guarantees from all the stakeholders with whom it deals in order to preserve confidentiality and authorised processing for the legitimate purposes involved. Such guarantees include international transfers under appropriate and recognised security protocols along with security certifications to ensure that information is kept complete, available and authentic, along with organisational and technical safeguard measures.

12. SECURITY

CATENON adopts organisational and technical measures with the aim of guaranteeing the security of personal data and avoiding its alteration, loss, unauthorised processing or access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed, whether they come from human action or from the physical or natural environment. CATENON is not responsible for any unauthorised loss, loss or manipulation of data which is beyond the control of CATENON.

The main mission is to try to ensure and guarantee both the processing of personal data and associated information, ensuring their custody, integrity, confidentiality, availability and resilience. To this end, the following actions have been carried out, working to make the compliance model adopted by the group operationally effective.

- Adoption and revision of established security policies, both physical and logical.
- Review of the privacy policy established periodically under the processing activities and purposes.
- We conduct internal audits of data collection, storage and processing, including physical security measures, to prevent unauthorised access to our systems.
- Access to personal data is strictly reserved for our employees and collaborators as well as service providers who need access to them in order to be able to process them on our behalf. Such persons are subject to strict confidentiality obligations and may be subject to disciplinary sanctions in the event of non-compliance with those obligations.
- Obtaining consent and mechanisms for the proper management of personal information.
- Appointment of the Data Protection Officer as an intermediary figure with the stakeholders.
- Servers and associated databases under guarantees of non-consensual access.
- We encrypt most of our services using SSL technology.
- We carry out Risk Evaluations, as well as Impact Evaluations, proceeding to the verification and parameterisation of controls associated thereto.
- Establishment of preventive controls or Due Diligence to assess our service providers and technology providers.
- Policies common to the companies of our group, regardless of geographical area, in order to unify the processes and processing of personal data.
- We anonymise and establish blocking protocols in our processing processes.
- Distribution through secure channels and under associated confidentiality agreements.
- Transparency and legality with respect to the recipients of the information, as well as impact assessments or revision of associated protocols for the sake of further processing.
- Channels of complaints or insertion of competent authorities in the matter with which we collaborate for possible incidents that may occur.
- Establishment of a system of security gaps in the event of any incident that may occur in the resources and information systems.

The CATENON Group has as a reference the safeguarding of information, continually striving to ensure the trust it places in us and, to this end, has incorporated transparency as the main requirement to show you the commitment acquired.