

## Privacy Policy SIRO GRC Software as a Service

### **1. Identification and contact details of the Data Processor:**

GMS Management Solutions, S.L., a company with registered office at Plaza Pablo Ruiz Picasso, 1, Torre Picasso, 28020, Madrid, Spain, with Tax Identification Number (CIF) B-83509307, and telephone number +34 91 1830800 (hereinafter, “MS” or the “Company”) and its Group companies (hereinafter, together with MS, “MS Group”), are responsible for processing your personal data. This Policy provides information on how the Company and the MS Group will use your personal data.

If you have any questions regarding the processing of your personal data, please contact the Company and the MS Group at the following address: [privacy@managementsolutions.com](mailto:privacy@managementsolutions.com).

### **2. General information: description of the information contained in the Privacy Policy:**

In this Privacy Policy you will find a table identifying, for each of the different data processing activities carried out by the Company and MS Group, the following information:

- The purposes for processing your personal data, that is, the reason why the Company and the MS Group process your personal data.
- The legal bases that allow the Company and the MS Group to process data for each of the stated purposes.
- The possible disclosure of your data to third parties, as well as the reason for such disclosure.
- The existence of potential international data transfers.
- The retention period for the data you provide to us.

### **3. Detailed information on the treatments performed by the MS Society and Group:**

<b>Purpose of personal data processing and types of personal data</b>
The personal data of the SIRO GRC Software as a Service users will be processed exclusively for: <ul style="list-style-type: none"><li>• Allow you to identify yourself and thus, use the services offered by the SIRO GRC platform.</li><li>• Provide technical and functional administration of the system.</li><li>• Addressing inquiries or incidents related to the use of the service.</li></ul> Data types processed include Personally Identifiable Information (name, email address), system usage data, IP addresses, activity logs, and other data necessary for providing the service. No other use or processing of your personal data will be done by MS
<b>Legal Bases</b>
The legal basis for the data processing is: <ul style="list-style-type: none"><li>• Execution of the contract or business relationship between the user MS as the provider of the SIRO GRC Software as a Service.</li></ul>
<b>Recipients</b>
Your data may be processed by cloud providers acting as data subprocessors, for hosting and infrastructure as a service services. These providers are subject to contracts pursuant to Article 28 of the GDPR. You can request an updated list of sub-processors by email.
<b>International Data Transfers</b>
Your data will be processed as far as possible in servers located in your country or in a geographical zone that is not considered to imply an International Data Transfer (e.g. countries with adequacy decisions).

When data is transferred to countries outside the EU and without adequacy decisions, these transfers will be carried out on the basis of signed standard data protection clauses, as adopted by the European Commission for international transfers, pursuant to Article 46.2 of the GDPR. If you would like to request a copy of these contractual clauses, please contact us at [privacy@managementsolutions.com](mailto:privacy@managementsolutions.com)

#### **Data retention**

The data will be retained while the user account remains active on the SIRO GRC Software as a Service . When the use of the SIRO GRC Software as a Service terminates, MS will follow the instructions provided by the Data Controller keeping data only to comply with legal obligations or for the defense against potential claims and only for the period necessary to do so. Once this period has expired, the data will be deleted.

#### **Purpose of personal data processing and types of personal data**

If users enter data belonging to other data subjects, MS will process this data only to store it in accordance with this policy. The purpose is that the users of the SIRO GRC system may utilize the data for further processing for their own needs.

No other use or processing of your personal data will be done by MS

#### **Legal Bases**

The legal basis for the data processing is:

- Execution of the contract or business relationship between the user MS as the provider of the SIRO GRC Software as a Service.

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## **4. Data subject rights exercise**

We inform you that you may exercise the following rights:

- (i) The right to access your personal data to know which data is being processed and the processing operations carried out with it;
- (ii) The right to rectify any inaccurate personal data;
- (iii) The right to erasure of your personal data, where this is possible;
- (iv) The right to request restriction of processing of your personal data when the accuracy, lawfulness, or necessity of the processing is in doubt, in which case we may retain them for the establishment, exercise, or defense of legal claims;
- (v) The right to object to the processing of your personal data when the legal basis that allows us to process them, as indicated in the table above, is legitimate interest. In this case, we will cease processing your data unless we have a compelling legitimate interest or for the establishment, exercise, or defense of legal claims.
- (vi) The right to withdraw your consent at any time.

You may exercise your rights at any time and free of charge by sending an email to [privacy@managementsolutions.com](mailto:privacy@managementsolutions.com), specifying the right you wish to exercise and your identifying information.

Please note that you have the right to file a complaint with the Spanish Data Protection Agency if you believe that there has been a breach of data protection legislation regarding the processing of your personal data.

## **5. Security measures**

MS declares that it has implemented and maintains the technical and organisational measures necessary to ensure an appropriate level of security in accordance with Article 32 of Regulation (EU) 2016/679 (GDPR), with respect to the personal data processed through the SIRO GRC Software as a Service platform.