

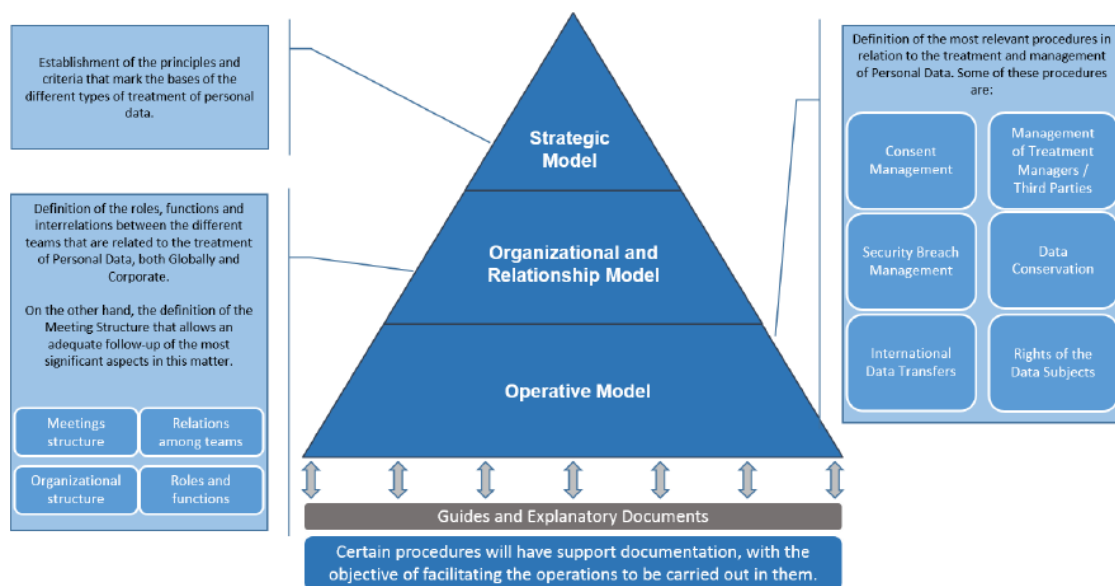
## Governance Model Rule on Personal Data Protection

Telefónica S.A.



The Governance Model Rule on Personal Data Protection develops the strategic, organizational and operational framework for the different actions in the area of data protection and encompass the most important aspects to be taken into account for the proper management and protection of personal data.

It's a set aimed at ensuring that personal data are managed in accordance with the current regulations, notably the European regulations of the General Data Protection Regulation (GDPR) and other related regulations.



### STRATEGIC MODEL

It establishes the principles and criteria that mark the basis of the different types of treatment of personal data.

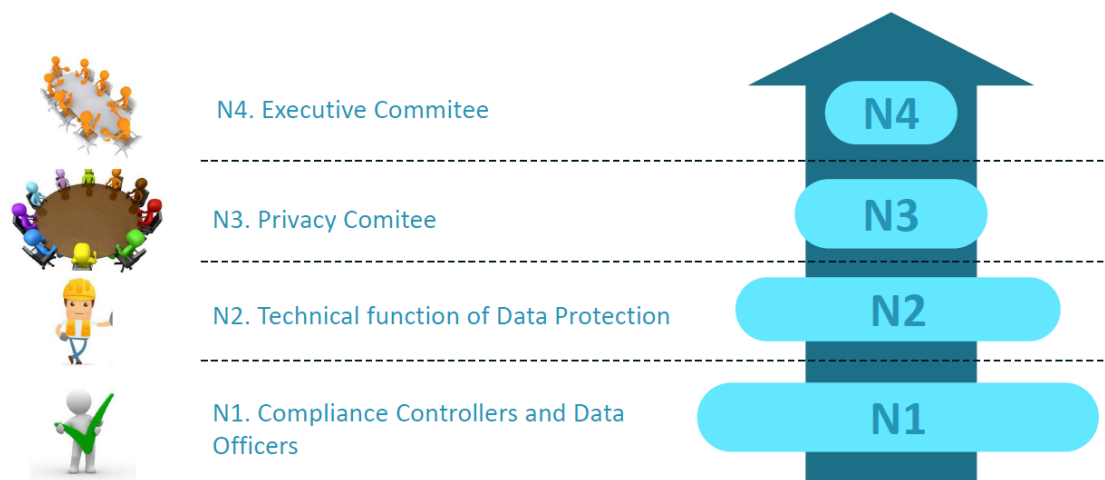
## ORGANIZATIONAL AND RELATIONSHIP MODEL

It defines the roles, functions and interrelations between the different teams that are related to the processing of personal data are defined, both globally and corporately. On the other hand, the structure of meetings is defined, which allows an adequate follow-up of the most significant aspects in this matter. So:

- **Data Protection Office (DPO)** is responsible for the Personal Data Protection Function and reports directly to the Board of Directors of Telefónica, S.A., S.A. In addition to being responsible for ensuring privacy and data protection in the Group, provides, directly or indirectly, service and advice on these matters to the corporate areas, centralised business units, regions and, in general, all the Group companies. The Regulations define in detail all their functions and responsibilities.
- **The DPO Office:** The person responsible is the DPO and is supported by the technical function of Data Protection and the function of coordination of Compliance and Data and other areas of the company, such as the areas of Compliance, CDO, Technology/IT, General Secretariat, Security, Corporate Ethics and Sustainability, Business and Internal Audit
- **Relationship structure:** The different axes of the function relates through the following forums or interactions:
  - Board of Directors: The DPO will report annually to the Board of Directors, through the Audit and Control Committee, on the most important aspects of the compliance activity which supervises.
  - Company's Management Bodies: At the request of the Company's Management Bodies, the DPO may report on any specific aspects derived from the scope of its activity, both in general terms and in relation to specific situations
  - Steering Committee: The Steering Committee meets semi-annually with the assistance of a representative from each of this areas (Security General Counsel / Legal Services; Regulation and Institutional Affairs; Technology; CDO; Compliance; Corporate Ethics and Sustainability and Internal Audit)
  - Business Committees: The DPO Office will maintain, through the technical function of Data Protection, ongoing interactions with the areas, through the Compliance Responsible, in order to ensure maximum uniformity in the application of common processes, and/or identification, and treatment of specific privacy issues in the area of activity in each area.
  - Forum of DPOs: The Forum of local "Data Protection Officers" (Forum of DPOs) will meet semi-annually under the coordination of the Compliance and Data coordination function, with the assistance of a representative of the Legal Privacy function (belonging to the General Counsel / Legal Services). In said Forum of DPOs, the status of compliance with the

Government model of the privacy of the Telefonica Group in each of the jurisdictions will be reviewed, and the specific problems that may be transversal to said organizations will be reviewed.

This organizational and relationship model identifies the compliance controllers and data officers in each department to ensure compliance with the databases that are managed in the corresponding department.



## OPERATING MODEL

The Operating Model defines the main procedures related to the supervision of compliance by the Company with the regulations for the Protection of Personal Data. Three types of processes are defining:

- Strategic Processes: The Privacy Policy (Group level)
- Operating Processes (Privacy Domains): it defines specific Core Processes (Operating Processes or "privacy domains") to comply with the provisions of current regulations (Data treatment; management of Security; third party management; rights of the interested parties; data classification; International Data Transfer; consent management; data preservation)
- Support processes: it establishes the foundations of the progressive consolidation of a compliance culture in terms of privacy and protection of personal data throughout the Company, through audit plans, and training and awareness.



## **COMPLIANCE MODEL**

The Compliance Model of the Global Governance of Privacy Program will have as its objective the maintenance of a system that ensures a continuous follow-up of compliance with the Government Model and current regulation.