

PRIVACY POLICY APPLICABLE TO THE TELEFÓNICA UNIVERSE

1. Our principles and the purpose of this section

We are committed to respecting the privacy of Participants and the secrecy and security of personal data, in accordance with the provisions of the applicable regulations on data protection.

Your privacy and the security of your data are our priority. It forms part of our DNA and we reflect this in the principles that govern this Privacy Policy.

1.1 Transparency

We are 100% transparent with you about the data we collect and/or process about you and we explain why we use it and for what purposes. We will not process your data in an unexpected, opaque, or abusive manner.

1.2 Control

You are the only one who can control how your data is used. We provide you with the tools so that you can decide at any time how you want us to handle your data, up to when and how you can access and update your personal information.

1.3 Security

We take care to ensure the security, secrecy and confidentiality of your data and personal information. We adopt the most stringent and robust security measures to prevent their loss, alteration or misuse or unauthorised access.

In compliance with these principles, the purpose of this section is to inform you, as a Participant in the Telefónica Universe (hereinafter, the “**Initiative**”), of all matters relating to the processing of your data that we perform on the occasion of your access to and participation in the Initiative and its different activities, and to make you aware of everything required to enable you to maintain control over your data.

This Privacy Policy is included in the Terms and Conditions of the Initiative, and therefore both legal terms should be jointly read and interpreted by the Participant.

2. Who is the controller of your data?

The processing of your data when you sign up for, access and use the Initiative is performed under the responsibility of:

Telefónica, S.A., the Spanish parent company of the Telefónica Group, with Tax ID number A28015865 and its registered office at Gran Vía 28, 28013, Madrid, Spain.

Hereinafter, this entity responsible for the processing of your data will be referred to as “Telefónica” or “we” or “us”.

If you have any questions regarding the processing of your data on the occasion of your access to and use of the Initiative, you can contact Telefónica by writing to universo@telefonica.com.

We also inform you that Telefónica has a Data Protection Officer who ensures compliance with the data protection regulations at Telefónica. He/she can be contacted for any questions, queries and/or complaints you may have when we process your data, by writing to [DPO telefonicasa@telefonica.com](mailto:DPO_telefonicasa@telefonica.com).

3. What data is processed, for what purpose and why do we process the data?

Below we inform you in a differentiated manner of the purposes pursued by Telefónica, the legal basis upon which these purposes are based and other relevant aspects of the processing of your personal data.

3.1 To allow participation in the Initiative

For what? - Purposes of the processing: the purpose of the processing that we pursue is to allow registration for the Initiative and access as a Participant and enjoyment of all the activities during the Initiative, checking the different requirements that are mandatory for the Participants.

Why? - Applicable legal basis: the legal basis upon which we rely to carry out this purpose is the execution of the Terms and Conditions of the Initiative; this purpose is necessary for the implementation and fulfilment of the contractual relationship established between Telefónica and the Participant when the Participant accepts these Terms and Conditions.

What data? - Typology of data: the data we process for this purpose are the data provided by the Participant on the form or channel for participation in the Initiative and in the different activities we provide to this effect (identification data, contact data, nationality, year of joining and leaving the Telefónica Group, professional area, image, etc.). Some of these data will be compulsory and some will be voluntary for the Participant. The Participant's refusal to provide the data marked as mandatory will mean he/she will be unable to participate in the Initiative.

Where did they come from? - Origin: the data we process for this purpose come from the Participant, who informs Telefónica and provides them when he/she signs up for the Initiative or updates or modifies his/her access data.

Who do they belong to? - Categories of data subjects: the data we process for this purpose refer to the Participants in the Initiative, employees or former employees of the Telefónica Group.

How long are they processed for? - Retention periods: the data we process for this purpose will be subject to the general retention criteria set out in the following section of this Policy.

3.2 Development of the Initiative and all its activities

For what? - Purposes of the processing: the purpose of the processing that we pursue is to develop the Initiative and all its activities, as set out in the applicable Terms and Conditions, including:

- Preparation and sending of a personalised “Telefónica Diploma” for each Participant.
- Public disclosure of certain Participant data on a screen physically set up in the Telefónica Foundation Space, allowing interactive searches for Participants.
- Participation in draws.
- Aggregation and anonymisation of data to extract and distribute interesting and curious statistical data on employees and former employees of the Telefónica Group.
- Preparation and public disclosure of a “Logbook” anonymously compiling the best contributions of the Participants in the two open questions on the Initiative’s participation form.
- Constitution of the group of Participants interested in forming part of the Telefónica Group Alumni network.
- Use and exploitation of the images provided by the Participants to construct different actions to promote and popularise the Initiative and Telefónica’s centenary.
- Basic profiling of the Participants in accordance with their nationality, age, gender and/or professional area.
- Sending of correspondence related to the Initiative and/or Telefónica’s centenary.

Why? - Applicable legal basis: the legal basis upon which we rely to carry out this purpose is the execution of the Terms and Conditions of the Initiative, the acceptance of which permits participation in and enjoyment of the activities in the Initiative, as well as the consent given by the Participant when voluntarily providing data to Telefónica within the framework of the Initiative or expressly accepting that his/her data be processed for a certain activity by means of an affirmative answer or the express ticking of a box to said effect.

What data? - Typology of data: the data we process for this purpose vary according to the activity in the Initiative but, in any event, they will coincide with the data provided by the Participant when participating.

Where did they come from? - Origin: the data we process for this purpose come from the Participant.

Who do they belong to? - Categories of data subjects: the data we process for this purpose refer to the Participants in the Initiative.

How long are they processed for? - Retention periods: the data we process for this purpose will be subject to the general retention criteria set out in the following section of this Policy.

3.3 To maintain the security of the Initiative, prevent fraud and extract aggregate usage statistics

For what? - Purposes of the processing: the purpose of the processing we pursue is to maintain the proper security of the Initiative, guarantee its availability and prevent fraud by the Participants and any third party seeking to breach the Terms and Conditions or carry out attacks against the Initiative or Telefónica through the Initiative, as well as the extraction of aggregate statistics on usage by the Participants in the Initiative.

Why? - Applicable legal basis: the legal basis for this purpose is our legitimate interest in protecting ourselves against attacks and fraud and guaranteeing the availability of the Initiative and developing and improving it.

What data? - Typology of data: the data we process for this purpose refer to data provided by the Participants, logs of use of the Initiative and any other information extracted from the terminal devices used to access the Initiative.

Where did they come from? - Origin: the data we process for this purpose come from the Participant and the device via which he/she participates.

Who do they belong to? - Categories of data subjects: the data we process for this purpose refer to Participants in the Initiative.

How long are they processed for? - Retention periods: the data we process for this purpose will be subject to the general retention criteria set out in the following section of this Policy.

4. How long is the data retained?

Generally speaking, we will retain your data throughout the period necessary to fulfil each purpose outlined in each processing activity and to determine any liabilities that may arise from said purpose and, in any event, for as long as the Participant continues to be registered as such without having requested the cancellation and deletion of his/her Participant account or until we delete his/her account due to a breach of the Terms and Conditions, or until the Participant withdraws the consent that he/she has given from time

to time for each activity in the Initiative, without his/her withdrawal of consent affecting the lawfulness of the processing of his/her data carried out prior to said withdrawal.

In any event, the Participant's data will be retained in accordance with the retention criteria or specific periods outlined in each data processing activity and, as appropriate, until he/she withdraws his/her consent and/or objects to the processing of the data.

In this regard, we will do our best to provide you with an automatic and simple mechanism for you to withdraw the consent granted and/or to object to the processing and, in any case, we are at your disposal at the mailing address for exercising your rights as indicated in section 6 of this Policy.

5. Who is the recipient of the data? Are there any international transfers of data?

In order to carry out the processing purposes described above, we may make use of authorised subcontractors acting on behalf of Telefónica as data processors (e.g., internet service providers, data hosting and technical support providers, email providers, providers of general services and physical security services, etc.) and contractually subject to our instructions, only for the lawful purposes described above and throughout the period of time strictly necessary for the purpose.

In addition, where there is a legal obligation or requirement to do so, we may disclose your data to the competent public authorities in accordance with such legal obligation or requirement.

Where authorised subcontractors acting on behalf of Telefónica or the above-mentioned recipients are located or process your data outside the European Economic Area, we will be making an international transfer of your data in accordance with the provisions of data protection law. In the course of the initiative, we will not and do not intend to carry out any international data transfers as exporters. Without detriment to the above, we inform you that, in general, we will avoid international transfers and your data will be processed within the European Economic Area. However, where necessary, we will take such organisational, technical and contractual measures as may be necessary to ensure the protection and security of your data, such as, for example, signing the European Commission's Standard Contractual Clauses with the authorised subcontractor or third-party transferee, carrying out impact assessments on the international transfer in question to assess the risk and take measures to mitigate it, encryption of data in transit or at rest, pseudonymisation of the data subject to the international transfer, the possibility for the data subject to claim damages directly against the authorised subcontractor or third party transferee, etc.

6. What rights do you have as a data subject?

As a data subject, data protection regulations grant you certain rights over your data which, depending on how they apply, you may exercise against Telefónica. Here's what they are and how you can exercise them. We also inform you that on the website of the

Spanish Data Protection Agency (www.aepd.es) you can find more information on the characteristics of these rights and download templates for exercising each of them.

6.1 Right to withdraw consent

This is your right to withdraw your consent to the processing of your data for the purposes that are legitimate on that basis, at any time and in an easy way.

6.2 Right of access

It is your right to ask us for details of the data we hold about you and how we process it, and to obtain a copy of it.

6.3 Right of rectification

It is your right to obtain the rectification of your inaccurate or erroneous data, as well as to complete incomplete data.

6.4 Right of erasure

It is your right to request deletion or suppression of your data and information in certain circumstances. However, please note that there are certain occasions when we are legally entitled to continue to store and process your data, for example, in order to comply with a legal obligation to retain data.

6.5 Right of restriction

It is your right to restrict or limit the processing of your data in certain circumstances. For example, if you apply for deletion of data, but, instead of deleting it, you would prefer that we block it and process it only for retention purposes because you will need it later to make a complaint. Again, please note that there may be times when we are legally entitled to refuse your request for a restriction.

6.6 Right to object

It is your right to object to our processing of your data for a specific purpose, in certain circumstances provided for by law and related to your personal situation.

6.7 Right to portability

It is your right to ask us to receive your personal data in a structured, commonly used, machine-readable and interoperable format and to transfer it to another data controller, provided that we process your data by automated means.

6.8 The right to not be subject to automated individual decisions

This is your right to ask us not to subject you, in certain circumstances, to a decision based solely on automated processing of your data, including profiling, that produces legal effects concerning you or similarly significantly affects you.

In general, you may exercise the above rights at any time and free of charge by contacting Telefónica at universo@telefonica.com.

It is important to bear in mind that when you exercise a right, in most cases, you must clearly specify which right you are exercising and provide a copy of a document proving your identity.

Any exercise of rights shall be answered within a maximum period of one month, which may be extended by two months if necessary, taking into account the complexity of the request and the number of requests.

Finally, in the event that you do not agree with the way in which your data is handled by Telefónica, you have the right to lodge a complaint with the national supervisory authority by contacting the Spanish Data Protection Agency, whose contact details are as follows:

Agencia Española de Protección de Datos
C/ Jorge Juan, 6 – 28001 Madrid
www.aepd.es

7. Further processing of data and changes to the Privacy Policy

Telefónica may process the data to which this Privacy Policy applies for purposes other than those already listed when such further processing is found to be compatible following analysis and the weighing up of all the factors, in accordance with the applicable legislation on data protection.

Telefónica also reserves the right to update this Privacy Policy at any time. Any such update will be made public by Telefónica, in any event, with such notice prior to its entry into force as is legally required. In addition, it shall be communicated directly to the data subject where it affects his or her rights or freedoms or where, for example, the inclusion of a new processing activity would require the data subject's consent or changes the scope of the legitimate interest that enables the processing to be carried out.

Most recent update: June 2023