

INFORMATION PROCESSING POLICY

CUPAGROUP
Since 1892



This policy is intended to establish the principles and basic commitments for the appropriate use and processing of information.

Compliance is obligatory for **CUPA GROUP** employees, directors, governing organs and collaborators whatever their location, hierarchical position in the organizational chart or the type of contractual relationship uniting them to the company, as well as the different forms of administrative organs that manage the company and the members of those organs.

CUPA GROUP, therefore, promotes the following commitments:

- **CUPA GROUP** undertakes to establish **instructions on the use of information**, obligations and prohibitions on said use, classification of the information, methods for storing it and those responsible for its safekeeping.
- A universal commitment is adopted by **CUPA GROUP** employees to **prevent security breaches** which would involve uncontrolled circulation of information inside and outside the group.
- These instructions will be drafted in accordance with the **criteria laid down by the legislation** applicable to the processing of **personal data, data likely to be business secrets and any other type of information** which, while not coming under any of the previous categories **management considers** must be subject to special protection.
- Information will be **identified** and subsequently **classified** according to the instructions laid down in the information processing protocol.
- The **degrees of protection** will always comply with the legal standards and may even exceed them.
- **Access** to the different types of information may be **restricted** according to the aforementioned instructions to ensure better management and protection.
- Apply **general security measures** at **organizational, physical** (paper documents) and **technical** (digital formats) levels applicable to all types of information likely to be governed by this policy. These measures will be developed in the technical annexes corresponding to each of the different information processing systems that may establish their **own specific measures** which will take precedence.



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