



REPORTING CHANNEL DATA PROTECTION

In accordance with the applicable current legislation on personal data protection (*Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC –the **General Data Protection Regulation** or **GDPR** –*), the current legislation on whistleblowing channels and whistleblower protection (*Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019 on the protection of persons who report breaches of Union law – **Directive (EU) 2019/1937** –*), the applicable national legislation on both matters and the doctrine developed by the competent supervisory authorities in this regard, it is hereby informed that the personal data that may be collected in the context of this Reporting Channel will be processed in accordance with the following considerations:

Treatment co-managers

The personal data of the informant (in case he/she discloses his/her identity), of the reported person, of any other subjects mentioned in the communication or of the persons interviewed in the framework of the eventual subsequent investigation, will be processed by Piolín BidCo, S.A. (hereinafter, the "**Company**") and Parques Reunidos Servicios Centrales, S.A. (hereinafter, "**PRSC**"), both companies belonging to the Parques Reunidos Group, with registered offices at Federico Mompou 5, Edificio 1 planta 3ª, 28050, Madrid, Spain and acting as co-responsible for the processing.

If your communication concerns or is related to another subsidiary company of the Parques Reunidos Group in Europe, this company shall act together with the Company and PRSC as co-responsible for the processing of personal data.

If you wish to know the essential parts of the co-responsibility agreement entered into between the Company, PRSC and the subsidiary company that may be affected by your communication, you may contact the Data Protection Officer (hereinafter, the **DPO**) through any of the addresses provided in the section "*Contact Data Protection Officer*".

You can consult through this [link](#) the list of subsidiaries of the Parques Reunidos Group in Europe which, in the event that the communication affects them, may act as co-responsible for the processing together with the Company and PRSC.

Contact Data Protection Officer

If you have any questions about the processing of your personal data or wish to request the essential parts of the co-responsibility contract existing between the co-responsible parties, you can contact the DPO by sending your request to the postal address Federico Mompou 5, Edificio 1 planta 3ª, 28050, Madrid, Spain or by e-mail to dpo@grpr.com.



Processing purposes and legal bases

Personal data will be processed exclusively for the purpose of complying with the legal obligations required by the applicable legislation on whistleblowing channels and whistleblower protection (namely, EU Directive 2019/1937 and national legislation applicable in each case by transposition of this Directive) and in particular to (i) assess the claims or information received through the Reporting Channel, (ii) carry out the necessary internal investigations in accordance with the internal investigations policy, (iii) implement the appropriate corrective measures in each case, and (iv) record the operation and effectiveness of the Reporting Channel and the Company's Compliance and Criminal Risk Prevention Model.

Thus, the basis of legitimacy for the processing of data received as a result of a claim or in the framework of a subsequent internal investigation is Article 6.1.c) of the GDPR, i.e. the processing is necessary for the fulfilment of the legal obligation to have a Whistleblowing Channel or Internal Reporting Channel, in accordance with the applicable legislation on whistleblowing channel and whistleblower protection referred to above.

If a subsidiary company is not obliged to have an Internal Reporting Channel, the applicable basis of legitimacy would be Article 6.1.f) of the GDPR, i.e. the processing is necessary for the satisfaction of legitimate interests pursued by the subsidiary company concerned, such as assessing the communications that may affect them for the sole purpose of knowing, assessing the facts and, where appropriate, taking the necessary measures in the event of possible irregular conduct and/or Article 6.1.e) of the GDPR, insofar as the processing may be necessary for the performance of a task carried out in the public interest, since the communications included in the objective scope of application of the Reporting Channel may involve threats or harm affecting the public interest of the company in general.

Furthermore, in the event that a data subject requests to communicate verbally (by means of a personal interview, voice messaging system or, where appropriate, telephone line), the processing of personal data will also be based on his or her consent for the transcription of the conversation, which may in any case be verified, rectified and accepted by means of the data subject's signature, or for the recording of the conversation, provided that mechanisms with the appropriate guarantees and security measures are used for this purpose.

Data processed

The personal data that may be processed for the purposes described above are listed below by way of illustration, but not limitation:

- I. Identity, role, functions and contact information of informants, reported, other affected parties, and interviewees.
- II. Reported facts and personal data related to them.
- III. Any evidence related to the facts denounced.
- IV. Research reports.
- V. Data obtained during interviews.



The data will be obtained by means of the claim itself or in the framework of the eventual subsequent investigation.

As a general rule, personal data that are specially protected according to the criteria established by the applicable data protection regulations (e.g. data concerning health, sexual orientation, religious beliefs, ideology, etc.) will not be processed. However, exceptionally and where indispensable for the proper assessment and investigation of a claim, such personal data may be processed on the basis of an essential public interest in accordance with Article 9(2)(g) of the GDPR.

Categories of Recipients

Personal data may be disclosed or made accessible to the following categories of recipients:

1. Subsidiary company/s of the Parques Reunidos Group in Europe and provided that they may be affected by a claim made through the Company's Reporting Channel. This communication of personal data shall be carried out under a co-responsibility model between the Company, PRSC and the subsidiary(ies) of the Parques Reunidos Group in Europe that are affected and on the basis that the affected subsidiary also needs to process the personal data in question, either to comply with its legal obligations under the applicable national legislation transposing Directive (EU) 2019/1937, to meet its legitimate interest with respect to communications concerning it or for the performance of a task carried out in the public interest, in both cases in accordance with the provisions of the section "*Processing purposes and legal bases*". Such communication of personal data may involve an international transfer of personal data where the subsidiary company concerned is not part of the European Economic Area (for example, in the case of subsidiaries located in the United Kingdom). Such possible international transfers of personal data will be fully covered by the GDPR and in particular by Commission Implementing Decision (EU) 2021/1772 of 28 June 2021 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom.
2. In addition to the foregoing, the personal data included in the claims may also be accessed by the internal personnel of the Company, of PRSC or, as the case may be, of the subsidiaries of the Parques Reunidos Group in Europe that may be affected by the claim, always in accordance with the restrictions provided for in the applicable national legislation.
3. The competent public authorities to whom, where appropriate, (i) the result of the possible internal investigation is transferred (Investigating Judge, Public Prosecutor or relevant administrative authority) in the framework of a criminal, disciplinary or sanctioning investigation or (ii) they require information relating to compliance with the obligations provided for in the applicable national legislation transposing Directive (EU) 2019/1937, the GDPR or other relevant regulations in the context of



the Reporting Channel. In this second case, personal data will only be disclosed in exceptional cases where it is strictly indispensable and in a proportionate manner, and personal data relating to informants will never be disclosed.

4. Other third parties (such as, for example, notaries), exclusively when this is necessary for the adoption of corrective measures in the institution or the processing of sanctioning or criminal proceedings, as the case may be.
5. The data processors that may be appointed by the Company and/or by the subsidiaries that may be concerned by a communication. This is an independent entity that processes personal data on behalf of the controller or, where applicable, joint controllers, and solely on their instructions in order to provide a service as a general rule. By way of illustration, but not limitation, these processors will provide services related to: the technological infrastructure supporting the Reporting Channel, external experts specialized in investigations and forensic services, storage service providers, as well as other external advisors that may be necessary for the successful completion of internal investigations. These entities are located in the European Economic Area, so there are no international data transfers.

In any case, the identity and personal data of the informants will be kept confidential and will not be communicated to the reported persons or to third parties or entities other than those indicated in this section.

Conservation period

The personal data processed will only be kept in the Reporting Channel for as long as it is necessary to decide whether to initiate an investigation into the reported facts.

Any information shown to be untruthful shall be deleted immediately, unless such untruthfulness could constitute a criminal offense, in which case the information shall be kept for the time necessary for the duration of the legal proceedings.

If the information received contains personal data included in the special categories of data, it shall, as a general rule, be deleted immediately, without being recorded and processed, unless these personal data are essential for the correct assessment and investigation of the claim, on the basis of an essential public interest in accordance with Article 9.2 g) GDPR (for example, claims based on discrimination based on race or sexual orientation). For these purposes, "special categories of data" are those listed in Article 9(1) of the GDPR.

In any case, after three months have elapsed from the receipt of the claim without any investigation having been initiated, the personal data shall be deleted, unless the purpose of storage is to leave evidence of the operation of the Reporting Channel. Claims that have not been processed shall only be recorded in an anonymized form, i.e. it shall not be possible by any means to identify any of the natural persons that form part of the claim



or file, and under no circumstances shall the blocking obligation provided for in the LOPDGDD be applicable.

Once an investigation has been completed, the data shall be kept in the internal investigations and information log book for such period as is necessary and proportionate for the purpose of complying with the applicable legislation, which may not exceed 10 years.

Data protection rights

Those affected or interested parties may exercise, in accordance with data protection legislation, their rights of access, rectification, deletion or opposition, and, if applicable, the limitation to the processing and portability of their data, where applicable according to the applicable regulations, by sending an e-mail to the address dpo@grpr.com or by post to Calle Federico Mompou 5, Edificio 1, planta 3, CP 28050, Madrid, Spain. In addition, they also have the possibility of lodging a complaint with the relevant supervisory authority, such as the Spanish Data Protection Agency (www.aepd.es) and, in the event that the communication concerns another company established outside Spain, with the relevant local data protection authority.

However, the exercise of such rights in Spain is not applicable when it is planned in relation to a communication related to the prevention of money laundering and terrorist financing, in which case the provisions of Article 32 of Law 10/2010, of 28 April, shall apply. In addition, in the event that the person to whom the facts described in the communication refer exercises the right to object, it shall be presumed that there are compelling legitimate reasons that legitimize the processing of their personal data, unless there is evidence to the contrary.
