



# DATA PROTECTION POLICY



APRIL 2025



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## I. INTRODUCTION

The present document establishes the common and general guidelines of action that in relation to the protection of personal data are applied in Praxia Energy, guaranteeing, with respect to them, the compliance with the applicable regulations.

The measures implemented in Praxia Energy guarantee the protection of the data of all the natural persons who are related to the company, assuring the right to honor and personal privacy in the treatment of the different types of personal data.

This document describes the rules and procedures applicable in the processing of personal data for which Praxia Energy is responsible in order to ensure compliance with the European Data Protection Regulation (2016/679) (EU GDPR) and the Organic Law 3/2018 of December 5, 2018 on the protection of personal data and guarantee of digital rights (LOPD).

## II. IDENTIFICATION OF THE COMPANY AS DATA CONTROLLER

### NAME /COMPANY NAME AND VAT ID

PRAXIA ENERGY S.L. B74162900

Calle Santa Susana, 1 - Ent oficina D, Oviedo, 33007, Asturias

Phone: 985211117

Email: [central@praxiaenergy.com](mailto:central@praxiaenergy.com)

[www.praxianenergy.com](http://www.praxianenergy.com)

### III. COMMITMENT OF THE GOVERNING BODY

Praxia Energy's governing body expresses its commitment to comply with the obligations and responsibilities for the protection of the personal data of its employees, customers and third parties that maintain relations with Praxia Energy, as well as the respect for the principles that inform the processing of personal data for which it is responsible:

- **PRINCIPLE OF LEGITIMACY, LICITUDE, LOYALTY AND TRANSPARENCY** guaranteeing the processing of data in a legitimate, lawful and loyal way, providing in any case, in a transparent way, the information related to the processing and protection of personal data.
- **DATA MINIMIZATION:** Praxia Energy will access and process the minimum and indispensable data for the fulfillment of its obligations.
- **ACCURACY:** Praxia Energy has the necessary measures to ensure that the data for which it is responsible are accurate, providing the necessary means for updating them by their owners, as well as for the rectification or deletion of erroneous or incorrect data.
- **LIMITATION OF THE TERM OF CONSERVATION:** Praxia Energy will keep the personal data for which it is responsible during the essential time for the fulfillment of the purposes for which they have been collected, as well as for the fulfillment of its obligations and responsibilities and until the extinction of the same.



- **INTTEGRITY AND CONFIDENTIALITY:** Praxia Energy keeps and treats the personal data applying on them the security and confidentiality measures. protección pertinentes, evitando el acceso a los mismos por personas no autorizadas, así como su pérdida o destrucción.
- **PROACTIVE RESPONSIBILITY:** Praxia Energy adopts, from the moment it accesses the personal data for which it is responsible, the relevant privacy and security measures according to the risk corresponding to each of the processing operations.

## IV. DEFINITIONS

Personal Data	Any information on an identified or identifiable natural person. An identifiable natural person is any person whose identity can be established, directly or indirectly, in particular by means of an identifier such as a name, an identification number, location data, an online identifier or one or more elements of that person's physical, genetic, mental, economic, cultural or social identity.
Treatment	Any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Data Controller	Natural or legal person, authority, service or body which, alone or jointly with others, determines the purposes and means of processing.
Processor	Person or entity that processes personal data on behalf of the Controller.

# DATA PROTECTION POLICY



Data Protection Officer	Person who assumes the function of advising Praxia Energy on the proper compliance with data protection regulations.
Addressee	A natural or legal person, public authority, department or other body to which personal data are disclosed, whether or not it is a third party. However, public authorities which may receive personal data in the framework of a specific investigation in accordance with Union or Member State law shall not be considered as recipients; the processing of such data by such public authorities shall be in accordance with the data protection rules applicable to the purposes of the processing;
Third Party	A natural or legal person, public authority, service or body other than the data subject, the controller, the processor and the persons authorised to process personal data under the direct authority of the controller or the processor;
Treatment limitation	Marking of personal data retained for the purpose of restricting their processing in the future.
Consent of the data subject	Any freely given, specific, informed and unambiguous indication of the data subject's freely given, specific, informed and unambiguous consent to the processing of personal data concerning him or her, either by a statement or by a clear affirmative action;
Personal Data Security Breach (Security Breach)	Any breach of security resulting in the accidental or unlawful destruction, loss or alteration of, or unauthorised disclosure of or access to, personal data transmitted, stored or otherwise processed;

## V. OBJET AND SCOPE OF APPLICATION

The purpose of this document is to inform all members of Praxia Energy of the measures and procedures developed and applicable in the company for the protection of personal data with a responsible and active attitude towards all processing of personal data carried out in the company.

Compliance with this document is mandatory for all Praxia Energy employees who have access to and may process personal data, have access to computer systems and equipment in which personal data is stored and all those involved in the processing of personal data.

## VI. BASES OF LEGITIMACY FOR THE PROCESSING OF PERSONAL DATA

Praxia Energy ensures that all data processing is carried out on the basis of the grounds of legitimacy provided for in Article 6.1 of the General Data Protection Regulation of the European Union. The bases of legitimacy that allow the processing of personal data are the following:

- The consent of the data subjects.
- The performance of a contract to which the data subject is a party.
- Compliance with a legal obligation applicable to the controller.
- the protection of vital interests
- The performance of a task carried out in the public interest or the exercise of public authority vested in the controller.

- The fulfilment of legitimate interests pursued by PRAXIA ENERGY.

Most of the processing carried out by PRAXIA ENERGY is based on the fulfilment of the contracts to which it is a party, the consent of the data subjects and the fulfilment of legally established obligations.

The specific legitimate bases for the processing of data carried out by Praxia Energy are specifically set out for each processing activity in the document **ANNEX I 'RECORD OF PROCESSING ACTIVITIES'**.

The processing of any personal data that is not supported by any of the legitimate bases or is not provided for in the Register of Processing Activities is prohibited.

In case of doubt, the PRAXIA ENERGY Privacy Officer should be consulted.

## VII. ORGANISATIONAL DATA PROTECTION MEASURES

### A. ROLES AND RESPONSIBILITIES

#### A.1. RESPONSIBLE FOR LIABILITY

VIII. The proper application of personal data protection measures requires the responsible action of all members of Praxia Energy. However, a **PERSON RESPONSIBLE FOR PRIVACY** has been appointed to define, apply and verify compliance with the established security measures, as well as to respond to any doubts that may be raised both by members of the company and by third parties in relation to the processing of personal data.

IX. Amongst his responsibilities are the development and maintenance of this policy, ensuring that it is adequate and sufficient in terms of

the personal data processed by the company, as well as guaranteeing the information and training of the rest of the members of Praxia Energy.

The functions of the Praxia Energy Privacy Officer are as follows:

- Disseminate this document and its annexes to all Praxia Energy staff.
- Receive and file the information forms signed by members of staff, suppliers, customers or third parties.
- To ensure that the companies that provide outsourced services to Praxia Energy sign the corresponding contract for the processing of data, as well as to file and keep them in safekeeping.
- In the event of any breach of security, notify the AEPD and the owners of the data that may be affected by it.
- Include in Praxia Energy's training plans, specific training related to the protection of personal data.
- Update this document when legislative or internal company changes make it necessary.
- Maintain the Register of Personal Data Processing Activities up to date.
- Ensure compliance in the event of the exercise of their rights by the holders of personal data.

The Praxia Energy Privacy Officer shall observe the obligation of **confidentiality and secrecy** with respect to the personal data to which he/she has access.

## **A.2. PERSONNEL WITH ACCESS TO PERSONAL DATA**

All personnel with access to personal data must be aware of their obligations in relation to data processing, with Praxia Energy providing the necessary training.

- The members of Praxia Energy with access to personal data are obliged to comply with the **duty of confidentiality and secrecy**, being expressly forbidden to disclose them to third parties.

- They shall prevent unauthorised persons from accessing personal data. To this end, the following shall be avoided:
  - o Leaving personal data exposed to third parties (unattended electronic screens, paper documents in public access areas, media with personal data, etc.) When absent from work, the screen shall be locked or the session closed.
  - o Paper documents and electronic media shall be stored in a secure place (cupboards or rooms with restricted access) 24 hours a day.
  - o Documents or electronic media (CDs, pen drives, hard disks, etc.) containing personal data shall not be disposed of without guaranteeing their destruction.
  - o Personal data or any personal information shall not be communicated to third parties, paying particular attention not to disclose protected personal data during telephone enquiries, e-mails, etc.).
  
- All data subjects will be informed of the processing that will be carried out on their personal data at the time the data is received by any natural person who is the data subject, through the use of the templates and clauses contained in **ANNEX II. CLAUSES** of the present document.
  
- All members of Praxia Energy who have access to personal data must be familiar with the **procedure for dealing with the rights of data subjects**, in accordance with the provisions of **APPENDIX III** of this document.
  
- When the members of Praxia Energy become aware of security breaches of personal data (SECURITY BREACHES), they must immediately inform the Privacy Officer, providing him/her with all the information they have in relation to the security breach detected.

## A. DATA MANAGEMENT

The proper management of the personal data for which Praxia Energy is responsible will conform to the following management process:



- 1. data capture:** at the time of data capture, the owner of the data will be **informed** of the identification of the data controller, the legitimate basis, the purposes of the processing, the storage periods and the rights that may be exercised in relation to the data. For this purpose, the **clauses and forms previously approved by the company** will be used, depending on who is the owner of the data and which are expressly included in ANNEX II of this document,
- 2. Classification and storage.** The data shall be classified and stored on the basis of the owner of the data in accordance with the provisions of the **Register of Processing Activities**, distinguishing between data pertaining to company personnel, customers, suppliers, possible candidates for jobs, etc. The **Register of Processing Activities** is included in ANNEX I of this document, and shall be kept constantly updated.
- 3. Use and treatment:** 1. Data capture: at the time of data capture, the owner of the data will be informed of the identification of the data controller, the legitimate basis, the purposes of the processing, the retention periods and the rights that may be exercised in relation to the data. For these purposes, the clauses and forms previously approved by the company will be used, depending on who is the owner of the data and which are expressly included in ANNEX II of this document.

b. Most of the processing carried out by PRAXIA ENERGY is based on legitimate interest, the consent of the data subject, compliance with a legal obligation and the execution of the corresponding contracts. The causes or bases that legitimise the processing of data must be recorded for each type of data in the Data Processing Register.

The processing of any personal data that does not find justification in any of the aforementioned legitimate grounds and which are included in the Register of Processing Activities is prohibited.

The data will also be processed securely. The **security measures applicable will depend on the type of data being processed.**

In any case, the processing of the data for which Praxia Energy is responsible is limited in time, and the **period during which the data may be kept and processed by the company must also be recorded in the Data Processing Register for each type of data.**

**4. Cession:** In general terms, the personal data for which Praxia Energy is responsible shall not be transferred or transmitted to third parties outside the cases expressly authorised by the company and foreseen in the Data Processing Register. By way of example, they may be transmitted to data processors such as legal advisors, tax advisors, employment advisors, IT consultants or others with whom Praxia Energy maintains the corresponding collaboration relationships and signs the obligatory data processing contracts. The possibility of transferring data is one of the points that must be expressly recorded in the Data Processing Register.

**5. Exercise of rights by data subjects.**

During the processing of the data carried out by Praxia Energy, the data subjects may exercise the rights recognised by the applicable regulations. For this purpose, Praxia Energy has specific forms incorporated into this

document in **ANNEX IV** for the exercise of each right as well as the instructions for their completion by the interested parties and their compliance by Praxia Energy. Compliance with requests for the exercise of rights is the function of the Privacy Officer. The rights that data subjects may exercise are as follows:

- **Right of Acces:** This consists of the right of interested parties to obtain confirmation from Praxia Energy as to whether the applicant's personal data are being processed and, if so, to request the following information about them:
  - o Purposes of processing
  - o Categories of the applicant's personal data which are being processed.
  - o Recipients to whom the personal data have been disclosed or are intended to be disclosed.
  - o Where possible, the envisaged period of time for which the applicant's personal data will be kept.
  - o Where the data have not been provided by the applicant, any available information on the origin of the data.
  - o The existence of automated decisions or use for profiling of the applicant's data.
- **Right to rectification:** It consists of the right that every owner of personal data has to request that erroneous, inaccurate or incomplete data be corrected or updated.

- **Right to erasure:** The data subject requests the deletion of Praxia Energy's files of the applicant's personal data. This right is not absolute, since Praxia Energy may retain them in the event that it is obliged by the application of the rules, for the fulfilment of a legitimate interest or to comply with a contract signed with the applicant.
  - **Right to restriction of processing:** It is the right that protects the owner of the data to request that their erroneous personal data not be processed until the appropriate rectification is made, to prohibit the illicit or illegitimate processing of data, as well as to prohibit the processing of data for purposes that have not been authorized by the owner or lack a legitimate basis.
  - **Right to data portability:** Consisting of the possibility for the data subject to request a copy of his/her personal data processed by Praxia Energy in a structured, commonly used and machine-readable format or to have them transmitted to the new data controller in cases where it is technically possible
  - **Right to object:** It allows the owner to object to the processing of data carried out by Praxia Energy on grounds related to their particular situation, when the data is processed by Praxia Energy on the basis of a legitimate interest.
- 6. Communicating potential security breaches.** In cases where security breaches affect personal data, such as theft or incontentious access to personal data processed by Praxia Energy, the Privacy Officer will notify the AEPD within a maximum period of 72 hours, including in the notification all the information necessary to clarify the facts that would have given rise to the undue access to the personal data. The notification will be made, in any case, by electronic means, through the Electronic Office of the Spanish Data Protection Agency ([www.sedeaeprd.gob.es](http://www.sedeaeprd.gob.es))

- 7. Destruction:** Once the personal data retention period has elapsed, they must be destroyed. This term, however, must be interpreted broadly, since it includes not only the physical destruction of the data, but also the anonymization or aggregation of the data or any action that destroys the link between the data and the natural person who owns it, in such a way that it becomes impossible to identify it.

## C. REGISTRATION OF PERSONAL DATA PROCESSING ACTIVITIES

PRAXIA ENERGY has a Register of Processing Activities through which compliance with the GDPR and LOPD is accredited with respect to the use and processing it carries out of the personal data for which it is responsible. The aforementioned register expresses, in relation to the different types of data processed, the following information:

- Identification of PRAXIA ENERGY as the data controller, the representative of the controller and, where appropriate, the data protection officer appointed by the company.
- The purposes of processing.
- The description of the different categories of data subjects and personal data subject to processing.
- The categories of recipients to whom the personal data is or will be disclosed.
- Where applicable, transfers of personal data to a third country or to an international organisation and their identification.
- Where possible, the deadlines for the deletion of the different categories

of data.

- The general description of the security measures, both technical and organisational.

### D. CLEAN TABLE POLICY

One of the greatest risks of unauthorized access to personal data occurs due to the carelessness of the members of the company themselves in accessing and safeguarding information. That is why PRAXIA ENERGY adopts a clean table policy that complements the technical measures implemented in the company and aimed at protecting both personal data and other information.

To do this:

- Computer equipment must be logged out when employees leave their workstation, both manually and automatically by setting the screen lock.
- Any documents or papers containing personal data will be left properly guarded, with limited access, preventing them from being visible on tables or shelves.
- The workplace must be kept tidy and clear of documents or computer supports that can be seen or accessible to other people.
- The destruction of information and documentation containing personal data will always be done securely and avoiding, in any case, that they can be accessed by unauthorized persons.

### E. TRAINING AND AWARENESS

PRAXIA ENERGY provides all its members with training in personal data protection.

This policy is mandatory for all Praxia Energy personnel and is available to all its members, and it is mandatory to read, know and understand it.

### X. TECHNICAL DATA PROTECTION MEASURES

To guarantee the protection of the personal data for which Praxia Energy is responsible, the company has certain technical protection measures applicable by all members of the organization, including:

- Application of user identification measures to access both computer equipment and the information stored on it
- Incorporation of antivirus and firewall systems into the computer equipment that are constantly updated.
- Making backups
- Regular equipment updates
- Inventory of equipment with access to personal data
- Classification of information and personal data according to the level of risk.
- Firewalls and Firewall to prevent unauthorized remote access to the equipment where personal data is stored and processed.

The security measures implemented at PRAXIA ENERGY are reviewed and verified on a regular basis.

## XI. PROCESSING OF SPECIAL CATEGORIES OF PERSONAL DATA

Praxia Energy may have access to certain special categories of data. Special categories of data are those that reveal racial or ethnic origin, political opinions, religious convictions, trade union membership, genetic data, biometric data intended to uniquely identify a natural person, data relating to the health or sex life or sexual orientation of a natural person.

With regard to data of a special nature, the general rule is the **prohibition of their processing**.

However, exceptionally, such data may be processed when any of the following circumstances occur:

- In the event that the owner of the data has given their explicit consent for the processing of the same for one or more specified purposes. However, this consent will not be sufficient when, in accordance with the applicable regulations, the prohibition cannot be overcome with the consent of the interested party.
- When the processing is necessary for the fulfilment of obligations and rights in the field of labour and social security and protection (for example, the processing of an employee's disability data for the purposes of correctly carrying out the withholding of personal income tax, the processing of a worker's special data to manage a deregistration from Social Security or the processing of a trade union membership data of an employee through the effects of being able to make the deduction of the union dues in the payroll).

- When the processing is necessary for the purposes of preventive or occupational medicine or assessment of the worker's work capacity (e.g. the processing of fit or unfit data by the employer, in relation to the worker's ability to perform his or her duties, as provided for in the applicable legislation.)

When the treatment is necessary for medical diagnosis, provision of health or social care or treatment, management of health or social care systems or \_\_\_\_\_ services.

- If it is personal data that the data subject has manifestly made public.

## XII. DISSEMINATION AND UPDATING

This document must be disseminated among all the members of Praxia Energy, who are obliged to act in accordance with the provisions of this document.

Likewise, these documents will be updated when the legislative or organisational changes of the company so advise.

## ANNEX I

### RECORD OF PROCESSING ACTIVITIES

*The data controller must review the data contained in the sections of the Records of Processing Activities generated and verify that they correspond to the exact circumstances of the data collected, the communications made and other conditions of each of the processing.*

Treatment: **Clients**

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## DATA PROTECTION POLICY

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Data controller	PRAXIA ENERGY S.L. B-74162900 C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias. T. 985211117 central@praxiaenergy.com www.praxiaenergy.com
Purpose of processing	Customer relationship management
Categories of interested parties	Customers: People with whom you have a business relationship as customers
Data categories	Those necessary for the maintenance of the commercial relationship. Invoicing, sending postal or email advertising  Identification: name and surname, NIF, postal address, telephone numbers, e-mail  Bank details: for direct debit payments
Recipient categories	State Tax Administration Agency  Banks and financial institutions
International transfers	No plans to make international transfers
Deletion period	Those provided for by tax legislation regarding the prescription of liabilities
Security measures	Those reflected in the DATA PROTECTION POLICY.

## Treatment: **Potential Customers**

Data controller	PRAXIA ENERGY S.L. B-74162900 C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias. T. 985211117 central@praxiaenergy.com www.praxiaenergy.com
Purpose of processing	Managing the relationship with potential customers
Categories of interested parties	Potential customers: People with whom you seek to maintain a business relationship as customers
Data categories	Those necessary for the commercial promotion of the company Identification: name and surname and postal address, telephone numbers, e-mail
Recipient categories	Not contemplated
International transfers	No plans to make international transfers
Deletion Period	One year from first contact
Security measures	Those reflected in the DATA PROTECTION POLICY.

## Treatment: **Employees**

Data controller	PRAXIA ENERGY S.L. B-74162900 C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias. T. 985211117 central@praxiaenergy.com www.praxiaenergy.com
Purpose of processing	Employee Employment Relationship Management
Categorías de interesados	Employees: People who work for the data controller
Data categories	Those necessary for the maintenance of the commercial relationship. Manage payroll, training Identification: name, surname, Social Security number, postal address, telephone numbers, e-mail Personal characteristics: marital status, date and place of birth, age, sex, nationality and percentage of disability Academic data Professional data Bank details, for direct debit of payroll payments
Recipient categories	State Tax Administration Agency National Social Security Institute Banks and financial institutions [Other potential recipients]
International transfers	No plans to make international transfers
Deletion Period	Those provided for by tax and labour legislation with respect to the statute of limitations for liabilities
Security measures	Those reflected in the DATA PROTECTION POLICY

## Treatment: **Candidates**

Data controller	PRAXIA ENERGY S.L. B-74162900 C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias. T. 985211117 central@praxiaenergy.com www.praxiaenergy.com
Purpose of processing	Management of the relationship with candidates for a job in the company
Categories of interested parties	Candidatos: Personas que desean trabajar para el responsable del tratamiento
Data categories	Los necesarios para gestionar los currículum de posibles futuros empleados  De identificación: nombre, apellidos, dirección postal, teléfonos, e-mail  Datos académicos  Datos profesionales
Recipient categories	No se contempla el envío de datos de carácter personal a ningún destinatario
International transfers	No está previsto realizar transferencias internacionales
Deletion period	Un año desde la presentación de la candidatura
Security measures	Las reflejadas en el POLÍTICA DE PROTECCIÓN DE DATOS

## Tratamiento: **Proveedores**

Data controller	PRAXIA ENERGY S.L. B-74162900 C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias. T. 985211117 central@praxiaenergy.com www.praxiaenergy.com
Purpose of processing	Management of the relationship with suppliers
Categories of interested parties	Suppliers: Persons with whom a business relationship is maintained as suppliers of products and/or services
Data categories	Those necessary for the maintenance of the employment relationship Identification: name, NIF, postal address, telephone numbers, e-mail Bank details: for direct debit payments
Recipient categories	State Tax Administration Agency Banks and financial institutions
International transfers	No plans to make international transfers
Deletion period	Those provided for by tax legislation regarding the prescription of liabilities
Security measures	Those reflected in the DATA PROTECTION POLICY

## Tratamiento: **Videovigilancia**

Data controller	PRAXIA ENERGY S.L. B-74162900 C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias. T. 985211117 central@praxiaenergy.com www.praxiaenergy.com
Purpose of processing	Safety of people and property
Categories of interested parties	Individuals accessing or attempting to access the premises
Data categories	Imagery
Recipient categories	Security Forces and Corps
International transfers	No plans to make international transfers
Deletion period	One month since recording
Security measures	Those reflected in the DATA PROTECTION POLICY

## ANNEX II

### INFORMATIVE CLAUSES

#### **PROCESSING OF EMPLOYEE DATA**

##### **Informative clause:**

*(The text shown below must be included in all the forms you use to collect personal data from your employees, whether it is done on paper or through a web form):*

##### **Data of the data controller:**

Name: PRAXIA ENERGY S.L. B-74162900

Address: C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias.

Telephone: 985211117- Correo electrónico: [central@praxiaenergy.com](mailto:central@praxiaenergy.com)

[www.praxiaenergy.com](http://www.praxiaenergy.com)

"At Praxia Energy we process the information you provide us with in order to maintain the employment relationship. The data provided will be kept for as long as the employment relationship is maintained or for the time necessary to comply with legal obligations and meet any possible liabilities that may arise from the fulfilment of the purpose for which the data were collected. The data will not be transferred to third parties except in cases where there is a legal obligation. You have the right to obtain information about whether Praxia Energy is processing your personal data, so you can exercise your rights of access, rectification, deletion and portability of data and opposition and limitation to its processing before Praxia Energy, C/Santa Susana nº 1 Entresuelo, Office CP.33007, Oviedo, Asturias, telephone: 985211117 or at the email address [central@praxiaenergy.com](mailto:central@praxiaenergy.com), sufficiently identifying themselves in their application by electronic means or, failing that, by means of a duly signed application. However, if the controller has reasonable doubts as to the identity of the natural person making the request, it may request that additional information necessary to confirm its identity be provided. Likewise, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, you may file a complaint with the national supervisory authority by contacting the Spanish Data Protection Agency, C/ Jorge Juan, 6 – 28001 Madrid."

## **PROCESSING OF CUSTOMER DATA**

### **Informative clause:**

*(The text shown below must be included in all the forms you use to collect personal data from your customers, whether it is done on paper or through a web form.)*

### **Data of the data controller:**

Name: PRAXIA ENERGY S.L. B-74162900

Address: C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias.

Telephone: 985211117- Mail: [central@praxiaenergy.com](mailto:central@praxiaenergy.com)

[www.praxiaenergy.com](http://www.praxiaenergy.com)

"At Praxia Energy we process the information you provide us with in order to provide you with the requested service and make your billing. The data provided will be kept for as long as the commercial relationship is maintained or for the time necessary to comply with legal obligations and meet any possible liabilities that may arise from the fulfilment of the purpose for which the data were collected. The data will not be transferred to third parties except in cases where there is a legal obligation. You have the right to obtain information about whether Praxia Energy is processing your personal data, so you can exercise your rights of access, rectification, deletion and portability of data and opposition and limitation of its processing at Praxia Energy, C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias, telephone 985211117 or at the electronic address [central@praxiaenergy.com](mailto:central@praxiaenergy.com), sufficiently identifying themselves in their application by electronic means or, failing that, by means of a duly signed application. However, if the controller has reasonable doubts as to the identity of the natural person making the request, it may request that additional information necessary to confirm its identity be provided. Likewise, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, you may file a complaint with the national supervisory authority by contacting the Spanish Data Protection Agency, C/ Jorge Juan, 6 – 28001 Madrid.

We also request your authorisation to offer you products and services related to those contracted and to build customer loyalty."

YES

NO

## **PROCESSING OF CANDIDATE DATA**

### **Informative clause:**

*(The text shown below must be included in all the forms you use to collect personal data from candidates for a job, whether it is done on paper or through a web form 😊)*

### **Data of the data controller:**

Name PRAXIA ENERGY S.L. B-74162900

Address: C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias.

Telephone: 985211117- Mail: [central@praxiaenergy.com](mailto:central@praxiaenergy.com)

[www.praxiaenergy.com](http://www.praxiaenergy.com)

"At Praxia Energy we process the information you provide us with in order to keep you informed of the different job vacancies that occur in our organization. The data provided will be kept until a job has been awarded or until you exercise your right to erasure. The data will not be passed on to third parties. You have the right to obtain information about whether Praxia Energy is processing your personal data, so you can exercise your rights of access, rectification, deletion and portability of data and opposition and limitation of their processing at Praxia Energy, C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias, telephone 985211117 or at the email address [central@praxiaenergy.com](mailto:central@praxiaenergy.com), sufficiently identifying themselves in their application by electronic means or, failing that, by means of a duly signed application. However, if the controller has reasonable doubts as to the identity of the natural person making the request, it may request that additional information necessary to confirm its identity be provided. Likewise, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, you may file a complaint with the national supervisory authority by contacting the Spanish Data Protection Agency, C/ Jorge Juan, 6 – 28001 Madrid."

NOTE: If candidates provide their CV in paper format, they will be asked to sign a dated form containing the above information.

## **PROCESSING OF SUPPLIER DATA**

### **Informative clause:**

*(The text shown below must be included in all the forms you use to collect personal data from suppliers or in the invoices you issue).*

### **Data of the data controller:**

Name: PRAXIA ENERGY S.L. B-74162900

Address: C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias.

Telephone: 985211117- Mail: [central@praxiaenergy.com](mailto:central@praxiaenergy.com)

[www.praxiaenergy.com](http://www.praxiaenergy.com)

"At Praxia Energy we process the information you provide us with in order to place orders and manage the billing of the products and services contracted. The data provided will be kept for as long as the commercial relationship is maintained or for the time necessary to comply with legal obligations and meet any possible liabilities that may arise from the fulfilment of the purpose for which the data were collected. The data will not be transferred to third parties except in cases where there is a legal obligation. You have the right to obtain information about whether Praxia Energy is processing your personal data, so you can exercise your rights of access, rectification, deletion and portability of data and opposition and limitation of its processing at Praxia Energy, C/Santa Susana nº 1 Entresuelo, Oficina CP.33007, Oviedo, Asturias, telephone 985211117 or at the electronic address [central@praxiaenergy.com](mailto:central@praxiaenergy.com), sufficiently identifying themselves in their application by electronic means or, failing that, by means of a duly signed application. However, if the controller has reasonable doubts as to the identity of the natural person making the request, it may request that additional information necessary to confirm its identity be provided. Likewise, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, you may file a complaint with the national supervisory authority by contacting the Spanish Data Protection Agency, C/ Jorge Juan, 6 – 28001 Madrid."

NOTE: If providers provide their data through another system, they will be asked to sign a dated form containing the above information.

## ANNEX III

### EXERCISE OF RIGHTS

This document has been designed for low-risk processing of personal data, from which it can be deduced that it may not be used for processing personal data that includes personal data relating to ethnic or racial origin, political, religious or philosophical ideology, trade union membership, genetic and biometric data, health data, and data on the sexual orientation of individuals, as well as any other data processing that entails a high risk to the rights of individuals and freedoms of people.

Article 5.1.f of the General Data Protection Regulation (hereinafter referred to as GDPR) determines the need to establish adequate security guarantees against unauthorised or unlawful processing, against the loss of personal data, destruction or accidental damage. This involves the establishment of technical and organisational measures aimed at ensuring the integrity and confidentiality of personal data and the possibility of demonstrating, as set out in Article 5.2, that these measures have been put into practice (proactive responsibility).

In addition, it must establish visible, accessible, and simple mechanisms for the exercise of rights and have defined internal procedures to guarantee the effective attention of the requests received.

#### **ATTENTION TO THE EXERCISE OF RIGHTS**

**Instructions** to attend to the exercise of rights:

- Upon presentation of their national identity card or passport, the owners of the personal data (data subjects) may exercise their rights of access, rectification, deletion, opposition, portability and limitation of processing. The exercise of rights is free of charge.  
The Privacy Officer of Praxia Energy must respond to the interested parties without undue delay and in a concise, transparent, intelligible manner, with clear and simple language and keep proof of compliance with the duty to respond to the requests to exercise rights made.
- If the application is submitted by electronic means, the information will be provided by these means when possible, unless the interested party requests otherwise.

- Requests must be answered within **1 month** of receipt, and may be **extended by another two months** taking into account the complexity or number of applications, but in this case the interested party must be informed of the extension within one month of receipt of the request, indicating the reasons for the delay.

**RIGHT OF ACCESS:** In the right of access, the interested parties will be provided with a copy of the personal data available together with the purpose for which they have been collected, the identity of the recipients of the data, the expected storage periods or the criteria used to determine it, the existence of the right to request the rectification or deletion of personal data as well as the limitation or opposition to their processing, the right to file a complaint with the Spanish Data Protection Agency and, if the data has not been obtained from the data subject, any available information on its origin. The right to obtain a copy of the data may not adversely affect the rights and freedoms of other data subjects.

- [Form for exercising the right of access.](#)

**RIGHT OF RECTIFICATION:** In the right of rectification, the data of the interested parties that are inaccurate or incomplete will be modified in accordance with the purposes of the processing. The interested party must indicate in the application what data it refers to and the correction to be made, providing, when necessary, the documentation justifying the inaccuracy or incomplete nature of the data subject to processing. If the data has been communicated by the controller to other controllers, it must notify them of the rectification of the data unless it is impossible or requires a disproportionate effort, providing the data subject with information about these recipients, if requested.

- [Form for exercising the right of rectification](#)

**RIGHT OF ERASURE:** In the right of deletion, the data of the interested parties will be deleted when they express their refusal to the processing and there is no legal basis that prevents it, they are not necessary in relation to the purposes for which they were collected, they withdraw the consent given and there is no other legal basis that legitimises the processing or it is unlawful. If the deletion derives from the exercise of the data subject's right to object to the processing of their data

for marketing purposes, the data subject's identification data may be kept in order to prevent future processing. If the data has been communicated by the controller to other controllers, it must notify them of the deletion of these unless it is impossible or requires a disproportionate effort, providing the interested party with information about said recipients, if requested.

- [Form for exercising the right of erasure.](#)

**RIGHT TO OBJECT:** In the right to object, when the interested parties express their refusal to the processing of their personal data before the controller, the latter will stop processing them as long as there is no legal obligation to prevent it. When the processing is based on a mission of public interest or on the legitimate interest of the controller, in response to a request to exercise the right of opposition, the controller will cease to process the data unless compelling reasons are demonstrated that override the interests, rights and freedoms of the data subject or are necessary for the formulation, Exercise or defense of claims. If the data subject objects to the processing for direct marketing purposes, the personal data will no longer be processed for these purposes.

- [Form for exercising the right of object.](#)

**RIGHT OF PORTABILITY:** In the right of portability, if the processing is carried out by automated means and is based on consent or is carried out within the framework of a contract, the data subjects may request to receive a copy of their personal data in a structured, commonly used and machine-readable format. They also have the right to request that they be transmitted directly to a new controller, whose identity must be communicated, where technically possible.

- [Form for exercising the right of portability.](#)

**RIGHT TO RESTRICTION OF PROCESSING:** In the right to restriction of processing, data subjects may request the suspension of the processing of their data in order to challenge their accuracy while the controller carries out the necessary verifications or in the event that the processing is carried out on the basis of the

legitimate interest of the controller or in compliance with a task of public interest, while it is verified whether these reasons override the interests, rights and freedoms of the data subject. The data subject may also request the retention of the data if he/she considers that the processing is unlawful and, instead of deletion, requests the limitation of the processing, or if, even if the controller no longer needs them for the purposes for which they were collected, the interested party needs them for the formulation, exercise or defence of claims. The circumstance that the processing of the data subject's data is limited must be clearly stated in the controller's systems. If the data has been communicated by the controller to other controllers, it must notify them of the limitation of the processing of these unless it is impossible or requires a disproportionate effort, providing the interested party with information about said recipients, if requested.

- [Form for exercising the right of restriction of processing.](#)

If the data subject's request is not processed, the data controller will inform him/her, without delay and no later than one month after receipt of the request, of the reasons for its failure to act and of the possibility of filing a complaint with the Spanish Data Protection Agency and of taking legal action.

## ANNEX IV

### MODEL CONTRACT WITH DATA PROCESSOR

in \_\_\_\_\_, \_\_\_\_ of \_\_\_\_\_ in 20\_\_

#### THE PARTIES APPEARING

**On the one hand,** D/Dña. \_\_\_\_\_ with ID \_\_\_\_\_ acting in the name and representation of PRAXIA ENERGY S.L. with CIF \_\_\_\_\_ and address \_\_\_\_\_ (hereinafter, the RESPONSIBLE)

**On the other hand,** D/Dña. \_\_\_\_\_ with ID \_\_\_\_\_ acting in the name and representation of \_\_\_\_\_ with CIF \_\_\_\_\_ and address \_\_\_\_\_ (hereinafter, the MANAGER)

Both parties recognising the representation in which they act



### EXPOSED

That by virtue of the contract signed by both parties on the date \_\_\_\_\_, the manager has undertaken to provide the responsible party with the services of \_\_\_\_\_ under the terms established in the aforementioned contract.

That, for the execution of said services, the PROCESSOR needs to process personal data of the CONTROLLER, therefore, by virtue of this contract, the CONTROLLER authorizes the PROCESSOR to process them during the provision of the contracted service, subject to the following

### CLAUSES

#### I. OBJET

The purpose of this contract is to regulate the processing of personal data necessary for the execution of the contract \_\_\_\_\_ signed between both parties on the date \_\_\_\_\_.

The processing of the data subject to this contract extends to the following activities (indicate the appropriate one)

Communication by transmission	
Conservation	
Consult	
Collation	
Destruction	
Diffusion	
Restructuration	
Extraction	
Interconexion	
Limitation	

#### II. AFFECTED INFORMATION

For the execution of the services derived from this contract, Praxia Energy makes available to the PROCESSOR, the following information

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### III. DURATION

The duration of this contract is linked to the validity of the main contract for the provision of service signed between both parties and whose execution is the cause.

In any case, once this contract has ended, the data processor must return to the controller (or another processor designated by the controller) all the personal data with which it has worked, as well as delete any copy of the same that is in its possession, unless there is a legal provision that requires its conservation, in which case they must be returned to the data controller, who will guarantee their conservation for as long as such obligation persists.

In the same way, the data processor may keep, duly blocked, the data as long as responsibilities may arise from its relationship with the data controller.

### IV. OBLIGATIONS OF THE DATA PROCESSOR

The DATA PROCESSOR and all the personnel at its service are obliged to:

- a. Using the data subject to processing only to comply with the purposes of this processing order and the contract from which it is based. Under no circumstances may you use the data for any other purpose or for your own purposes.
- b. To process the data in accordance with the instructions of the CONTROLLER, and must immediately inform the CONTROLLER of the detection of any illegality. If the PROCESSOR considers that any of the instructions contravenes the current regulations, he will inform the CONTROLLER.
- c. Keep in writing the Register of Processing Activities (RAT) carried out on behalf of the responsible party, containing:
  - The name and contact details of the processor(s) and of each controller on behalf of whom the processor acts and, where applicable, of the representative of the controller or the processor and the data protection officer.
  - The categories of processing carried out on behalf of the controller.
  - The purposes of the processing.
  - Where applicable, transfers of personal data to a third country or international organisation, including the identification of such third country or international organisation and, where applicable, the documentation of appropriate safeguards in the destination countries.

- An overview of the technical and organisational security measures relating to: (i) Pseudo-animation and encryption of personal data. (ii) The ability to ensure the ongoing confidentiality, integrity, availability, and resilience of treatment systems and services. (iii) The ability to restore availability and access to personal data quickly, in the event of a physical or technical incident and (iv) The process of regular verification, evaluation and assessment of the effectiveness of technical and organizational measures to ensure the security of processing.
- d. Not to communicate the data to third parties, unless they have the express authorisation of the data controller, in the legally admissible cases.

The processor may communicate the data to other processors of the same controller, in accordance with the instructions of the controller. In this case, the controller will identify, in advance and in writing, the entity to which the data must be communicated, the data to be communicated and the security measures to be applied to proceed with the communication.

If the processor is required to transfer personal data to a third country or to an international organisation, under the law of the Union or of the Member States applicable to it, it shall inform the controller of this legal requirement in advance, unless such law prohibits it for important reasons of public interest.

- e. Subcontracting

Not to subcontract any of the services that are part of the object of this contract that involve the processing of personal data, except for the auxiliary services necessary for the normal functioning of the services of the person in charge.

If it is necessary to subcontract any processing, this fact must be communicated in advance and in writing to the controller, 15 days in advance, indicating the processing that is intended to be subcontracted and clearly and unequivocally identifying the subcontractor company and its contact details. Subcontracting may be carried out if the responsible party does not express its opposition within the established period.

The subcontractor, who will also have the status of processor, is also obliged to comply with the obligations established in this document for the processor and the instructions issued by the controller. It is the responsibility of the initial processor to regulate the new relationship in such a way that the new processor is subject to the same conditions (instructions, obligations, security measures) and with the same formal requirements as the new processor, with regard to the proper processing of personal data and the guarantee of the rights of the affected persons. In the event of non-compliance by the sub-processor, the initial processor shall remain fully responsible to the controller for the fulfilment of the obligations.

- f. Ensure that the persons authorised to process personal data undertake, expressly and in writing, to respect confidentiality and comply with the corresponding security measures, of which they must be duly informed.
- g. Keep at the disposal of the controller the documentation accrediting compliance with the obligation established in the previous section, unless there is a legal provision that requires their conservation, in which case they must be returned to the data controller, who will guarantee their conservation for as long as such obligation persists.

In the same way, the data processor may keep, duly blocked, the data as long as responsibilities may arise from its relationship with the data controller.

- h. To guarantee the necessary training of the persons authorised to process personal data.
- i. i. Assist the data controller in responding to the exercise of the rights to:
  - Access, rectification, deletion, opposition.
  - To be notified by the controller regarding any rectification, deletion or limitation of the processing of the data, unless it is impossible or requires a disproportionate effort.
  - Limitation of processing
  - Data portability
  - Avoid being subject to automated individualized decisions (including profiling).

When the affected persons exercise the rights indicated above, the data processor must notify it by email to the address indicated by the data controller. The communication must be made immediately and in no case later than the working day following receipt of the request, together, where appropriate, with other information that may be relevant to resolve the request.

The data processor must resolve, on behalf of the controller, and within the established period, the requests to exercise the rights of access, rectification, deletion and opposition, limitation of processing, data portability and not to be subject to automated individualized decisions, in relation to the data subject of the order

- j. j. Notification of data breaches
  - To the person in charge:  
The data processor will notify the data controller, within a maximum period of 72 hours, and by email or other means, of any breaches of the security of the personal data in their charge of which they are aware, together with all the relevant information for the documentation and communication of the incident.

Notification shall not be necessary where such a breach of security is unlikely to constitute a risk to the rights and freedoms of natural persons. If available, the following information will be provided at a minimum:

- A description of the nature of the personal data breach, including, where possible, the categories and approximate number of data subjects affected, and the categories and approximate number of personal data records affected.
- The name and contact details of the Data Protection Officer or other point of contact where further information can be obtained.
- Description of the possible consequences of the personal data security breach.
- Description of the measures taken or proposed to remedy the personal data breach, including, if applicable, the measures taken to mitigate the possible negative effects.
- If and to the extent that it is not possible to provide the information simultaneously, the information shall be provided gradually without undue delay.

- Communication to the Data Protection Authority

It is the responsibility of the processor to report data security breaches to the Data Protection Authority.

The communication shall contain at least the following information:

- A description of the nature of the personal data breach, including, where possible, the categories and approximate number of data subjects affected, and the categories and approximate number of personal data records affected.
- Name and contact details of the Data Protection Officer or other point of contact where further information can be obtained.
- Description of the possible consequences of the personal data security breach.
- Description of the measures taken or proposed to remedy the personal data breach, including, if applicable, the measures taken to mitigate the possible negative effects.

If and to the extent that it is not possible to provide the information simultaneously, the information shall be provided gradually without undue delay.

When the violation poses a high risk to the rights of individuals

- k. To support the data controller in carrying out prior consultations with the supervisory authority, where appropriate.
- l. To make available to the controller all the information necessary to demonstrate compliance with its obligations, as well as for the performance of audits or inspections carried out by the controller or another auditor authorised by him/her.

m. Implement mechanisms to:

- Ensure the ongoing confidentiality, integrity, availability, and resilience of treatment systems and services.
- Restore availability and access to personal data quickly, in the event of a physical or technical incident.
- To verify, evaluate and assess, on a regular basis, the effectiveness of the technical and organisational measures implemented to guarantee the security of the processing.
- Pseudonymize and encrypt personal data, where applicable.
- Where appropriate, appoint a data protection officer and communicate their identity and contact details to the controller.

n. Return the personal data and, if applicable, the media containing them to the data controller, once the service has been completed. The return must entail the total deletion of the data existing on the computer equipment used by the processor. However, the processor may keep a copy, with the data duly blocked, for as long as responsibilities may arise from the execution of the service. Likewise, the CONTROLLER may choose to request the PROCESSOR to destroy the data, once the service has been fulfilled. Once destroyed, the processor must certify their destruction in writing and must deliver the certificate to the data controller. However, the person in charge may keep a copy, with the data duly blocked, as long as responsibilities may arise from the execution of the service.

### V. OBLIGATIONS OF THE DATA CONTROLLER

It is the responsibility of the data controller:

- a. to. Deliver to the processor the data referred to in clause IV of this document.
- b. Carry out an assessment of the impact on the protection of personal data of the processing operations to be carried out by the processor.
- c. Carry out the corresponding prior consultations.
- d. Ensure, before and throughout the processing, compliance with the GDPR by the processor, including the determination of the appropriate technical and organisational measures to be applied to guarantee and prove that the processing is in compliance with said regulation.
- e. and. Oversee processing, including conducting inspections and audits.

### VI. GOVERNING LAW AND JURISDICTION

This contract will be governed by and interpreted in accordance with (Regulation (EU) 2016/679 of the European Parliament and of the Council, of

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## DATA PROTECTION POLICY

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27 April 2016 or soon the Spanish adaptation legislation) in that which is not expressly regulated, the parties submitting to the exclusive jurisdiction of the Courts and Tribunals of Andalusia for the solution of any dispute that may arise between them with respect to the interpretation, validity, execution, compliance or termination of this Agreement, with the express waiver of any other jurisdiction that may correspond to them.

And in proof and in accordance with all of the foregoing, each of the Parties signs this Agreement in a letter (in number) copies, at the place and date indicated in the heading.

In Place to Day, Month, Year

Signed  
D./D.ªName and position

Signed  
D./D.ªName and position