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**SALTO SYSTEMS**  
**CORPORATE POLICY**  
**ON PERSONAL DATA**  
**PROTECTION**

Classification	X	General scope
		Confidential
Document	Corporate policy on personal data protection	
Scope of application	SALTO Group	

#### Version history

Version	Responsible	Description	Date	State
1	Salto HQ DPO	Document approval	October 2023	Approved

# Introduction

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SALTO is committed to protecting the privacy and data protection rights of all individuals and clients who entrust us with their data.

This commitment, which is aligned with our values as a company and with the culture of compliance that we promote, makes us aware of the responsibility involved in guaranteeing the right to the protection of personal data. In this sense, we work every day to maintain an appropriate strategy that allows us to manage data responsibly and reduce potential risks.

Accordingly, this corporate personal data protection policy (hereinafter, the “**Policy**”) reflects the principles and guidelines that should govern the entities that comprise the SALTO Group, in order to guarantee the right to data protection of all the individuals related to our organisation, safeguarding respect for their right to honour and personal privacy.

# Scope

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This policy applies to all companies of the SALTO Group (hereinafter, “**SALTO**”), including the parent company Salto Systems, S.L. and all branches and subsidiaries in which Salto Systems, S.L. holds, directly or indirectly, at least 50% of the share capital or voting rights, or in which it exercises effective control and a management unit.

# Principles Relating to Personal Data Processing

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## GENERAL PRINCIPLES

SALTO is committed to scrupulously complying with data protection legislation, as well as to promoting that the principles contained herein are considered in the design and implementation of all procedures involving the processing of personal data, including the products and services we offer.

### Principles of legitimacy, lawfulness, and fairness in the processing of personal data:

The processing of personal data shall be fair, legit, and lawful in accordance with the applicable legislation. In this regard, personal data shall be collected for one or more specific and legitimate purposes in accordance with the applicable law.

Where consent is obtained from data subjects, SALTO will ensure that such consent is freely given, informed and in accordance with the requirements of applicable law, both for obtaining and withdrawing it.

### Principles of minimisation

SALTO will ensure that the principle of data minimisation is applied in accordance with the applicable legislation, ensuring that only personal data that are strictly necessary for the purpose for which they are collected or processed, and appropriate to that purpose, will be processed.

### Principles of accuracy

Personal data must be accurate and updated in accordance with the applicable law. Otherwise, SALTO will delete or correct the data.

### Principles of limitation of the retention period

SALTO will not retain personal data beyond the periods established in its internal data retention policies, and undertakes that such periods will not exceed those established in the applicable legislation.

### Principle of integrity and confidentiality

In the processing of personal data, SALTO will adopt appropriate technical and organisational measures to protect the data from unauthorised or unlawful processing and to prevent accidental loss or damage, safeguarding its confidentiality. Except in cases permitted under the applicable law, SALTO will not use the data for purposes other than those that justified and permitted their collection, and they will not be communicated or transferred to third parties.

### Accountability principle

SALTO shall be responsible for complying with the principles set out herein and shall be able to demonstrate this where required by applicable law.

### Principles of transparency and information

SALTO will ensure that the processing of personal data is transparent in relation to the data subject. The information about the processing of her or his data will be provided in an understandable and accessible manner, in a way that is concise, clear and easily accessible.

### Data protection principles by design and by default

SALTO will comply with these principles from the first phase of development of an information system or a new project, and throughout its implementation

## ACQUISITION OR COLLECTION OF PERSONAL DATA

SALTO will not acquire or obtain your personal data from illegitimate sources, from sources that do not sufficiently guarantee their legitimate origin or from sources whose data has been collected or transferred in contravention of the applicable legislation.

## RELATIONS WITH THIRD PARTIES

SALTO works with service providers who may need to process certain personal data in order to provide their services.

In such cases, SALTO will comply with the requirements of the applicable law to allow the processing of personal data by these service providers, including, where appropriate, the formalisation of a contract with these service providers containing the necessary safeguards.

Likewise, when data is communicated to another company for processing in accordance with its own purposes, SALTO undertakes to have obtained the consent of the person concerned, unless the communication can be covered by any of the exceptions provided for in the applicable legislation.

## INTERNATIONAL DATA TRANSFERS

For the processing of personal data subject to EU law involving a transfer of data outside the European Economic Area, SALTO will conduct the transfer in strict compliance with the legal requirements. Furthermore, the SALTO entities located outside the EU will comply with the requirements for international transfers of personal data that may apply in their jurisdiction.

## RIGHTS OF THE DATA SUBJECTS

SALTO will ensure that the data subjects can effectively exercise their legally granted privacy and data protection rights, which may include the following rights:

- **Access:** the data subject may have the right to obtain confirmation from SALTO as to whether or not his or her data are being processed, as well as to obtain a copy of the data.
- **Rectification:** the data subject may have the right to request SALTO to rectify or to complete inaccurate data, without undue delay.
- **Erasure:** the data subject may have the right to have personal data relating to her or him erased (unless there is a legal obligation preventing the exercise of this right) when the data are no longer necessary for the purposes for which they were collected or processed, the data subject withdraws the consent on which the processing is based, or the data subject objects to the processing (provided that no other legitimate reasons for the processing prevail).
- **Restriction:** this refers to, for example, SALTO retaining the data, without processing them, as long as the data subject disputes the accuracy of the personal data, for a period of time that allows SALTO to verify the accuracy of the personal data; the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead the limitation of their use; SALTO no longer needs the personal data for the purposes of the processing, but the data subject needs them for the lodging, exercise or defence of claims, etc.
- **Objection:** the data subject may have the right to object to the processing of her or his personal data based on her or his particular situation, where it is intended for direct marketing, including profiling (e.g. sending commercial communications), or where it is processed for scientific or historical research or statistical purposes.
- **Data portability:** the data subject may have the right to ask SALTO to transfer her or his data in a structured and commonly used format.

## SECURITY INCIDENTS

SALTO is committed to managing security incidents involving personal data in a diligent manner and in strict compliance with applicable laws. To this end, SALTO will have in place its data breach management procedures which will, among other aspects, determine the notification requirements to affected parties and public authorities, which must be made without undue delay and, in any case, within the legal deadlines.

# Salto's Role In The Processing

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All of the SALTO entities will follow the principles and commitments detailed in this Policy both when SALTO is processing data as a data controller and when we are processing data as a processor.

## WHEN WE ACT AS A CONTROLLER:

SALTO acts as a “controller” when we determine the purposes and means related to the processing of personal data. In other words, when we decide “why” and “how” personal data should be processed. For example, when we as a company process the data of SALTO employees for the purposes of managing the employment relationship.

In these cases where we are processing data subjects' data as the data controller, we undertake to comply strictly with the commitments in this Policy.

## WHERE WE ACT AS A PROCESSOR:

SALTO processes personal data as a “data processor” when we process personal data on behalf of our customers in the context of the services we provide to them. For instance, when a customer subscribes to one of our cloud-based access control platforms (e.g. a hotel or a co-working space). These customers will manage certain personal data of their users (such as, employees and guests) on our platforms in order to provide them with the benefits of access control. As it is the customer who determines, among others things, which users can use their access control solutions and which users are assigned with keys, SALTO processes the personal data according to the instructions of the customer and for the sole purpose of providing the contracted services.

We are aware of the responsibility involved in the processing of personal data entrusted to us by our customers. Therefore, the Policy shall guide our actions to the extent that it is applicable. At the same time, we must also comply with the contractual obligations we have entered into with our customers in the agreed data processing agreements in accordance with the applicable legislation.

# Governance and Compliance

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The parent company of the SALTO Group has appointed a Data Protection Officer who will be responsible for ensuring compliance with data protection regulations and who will be supported by the organisation's governing bodies in the proper performance of her or his duties.

Additionally, in some of the SALTO Group's subsidiaries, a person may be appointed as a local data protection officer, either due to the legal requirements of the applicable local legislation or by corporate decision, who in any case will have the support and collaboration of the working teams of the parent company.