

DATA PROTECTION POLICY

The Management / Governing Body of **MOTO LUIS, SA** (hereinafter, the data controller), assumes the maximum responsibility and commitment to the establishment, implementation and maintenance of this Data Protection Policy, ensuring the continuous improvement of the data controller with the aim of achieving excellence in relation to compliance with Regulation (EU) 2016/679 of the European Parliament and Council, of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (OJEU L 119/1, 04-05-2016), and of the Spanish regulations on the protection of personal data (Organic Law, specific sectoral legislation and its implementing rules).

The Data Protection Policy of **MOTO LUIS, SA** is based on the principle of proactive responsibility, according to which the data controller is responsible for compliance with the regulatory and jurisprudential framework that governs this policy, and is able to demonstrate it to the competent control authorities.

In this sense, the data controller shall be governed by the following principles which should serve as a guide and framework of reference for all its personnel in the processing of personal data:

1. Data protection by design: the controller shall implement, both in determining the means of processing and in the processing itself, appropriate technical and organisational measures, such as pseudonymisation, designed to apply effectively data protection principles, such as data minimisation, and to integrate the necessary guarantees into the processing.
2. Data protection by default: the controller shall implement appropriate technical and organisational measures with a view to ensuring that, by default, personal data are processed only if they are necessary for each specific purpose of the processing.
3. **Data protection in the information life cycle**: measures ensuring the protection of personal data shall be applicable throughout the whole life cycle of the information.
4. Lawfulness, fairness and transparency: personal data shall be processed in a lawful, fair and transparent way in relation to the data subject.
5. Purpose limitation: personal data shall be collected for specified, explicit and legitimate purposes and shall not be further processed in a way incompatible with those purposes.

6. Data minimization: personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

7. Accuracy: personal data shall be accurate and, where necessary, kept up to date; all reasonable steps shall be taken to ensure that personal data which are inaccurate in relation to the purposes for which they are processed are erased or rectified without delay.

8. Limitation of storage time: personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes of the processing of the personal data.

9. Integrity and confidentiality: personal data shall be processed in a way that ensures adequate security of personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, through the implementation of appropriate technical or organisational measures.

10. Information and training: one of the keys to ensuring the protection of personal data is the training and information provided to staff involved in the processing of such data. During the life cycle of the information, all personnel with access to the data will be properly trained and informed about their obligations in relation to compliance with data protection regulations.

The Data Protection Policy of **MOTO LUIS, SA** is communicated to all the personnel of the person responsible for the processing and made available to all interested parties.

Consequently, this Data Protection Policy involves all data responsible personnel, who must know and assume it, considering it as their own, each member being responsible for applying it and verifying the data protection regulations applicable to their activity, as well as identifying and providing the opportunities for improvement that they consider appropriate in order to achieve excellence in relation to its compliance.

This Policy will be reviewed by the Management / Governing Body of **MOTO LUIS, SA**, as many times as deemed necessary, in order to adapt, at all times, to the current legal regulations on personal data protection.