



**PUIG**

# Privacy Policy



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## Background and purposes

The **Puig**<sup>1</sup> Ethical Code lays out the organization's internal and external values and commitments. When carrying out its business activities, **Puig** undertakes to comply with current standards in force in the markets where it operates, and in particular those relating to privacy and personal data protection.

This Privacy Policy addresses the company's firm commitment to setting up and standardizing a level of compliance that safeguards the application of regulations and best practice in the field of privacy and Personal Data<sup>2</sup> protection.

## Scope

This Policy has been approved by the Puig Brands, S.A. Board of Directors, and therefore applies to all **Puig** employees (regardless of their seniority, their role or their location), companies and businesses, and promotes compliance among external stakeholders (suppliers, clients, third party companies and professionals, etc.) that, while not being employed by **Puig**, form a relationship with the company over the course of its business activities.

The Policy applies alongside other compulsory internal standards such as the Information Security Policy and other standards governing data-related issues within the company.

Under no circumstances shall the application of this Policy result in non-compliance with current legal provisions in force in the markets in which **Puig** operates. These provisions shall prevail over this Policy, in all circumstances.

The various local **Puig** divisions and business units can implement this Policy via other local or division-specific policies that comply with the terms, principles and conduct contained in this Policy.

It is the responsibility of the company's highest governing body, **Puig** managers, and all employees in general, to be aware of, comply with, and ensure compliance with the contents of this Policy. The Data Protection Officer will supervise the Policy's implementation and ensure that it is suitably executed.

<sup>1</sup> "Puig" and/or the company, refers to the company Puig Brands, S.A., and its subsidiaries and any other legal entity that may be established in the future, over which Puig Brands, S.A. holds or may hold direct or indirect control, in accordance with article 42 of the Spanish Commercial Code.

<sup>2</sup> "Personal Data" refers to any information relating to a natural person that can be used to identify them, whether directly or indirectly, via an identifier, such as a name, an ID number, location data, an online ID or via one or several of a person's distinctive features relating to their identity, whether these features are physical, physiological, genetic, psychological, financial, cultural or social in nature.



# Principles and commitments

## Principles

This policy sets out the fundamental principles arising from the commitments laid out in the **Puig** Ethical Code and in applicable regulations. These principles are listed below:

- **Lawfulness, loyalty and transparency:** Personal data will be processed in a lawful, loyal and transparent way, in accordance with applicable legislation, while providing the Data Subjects<sup>3</sup> with the necessary information in an accessible, readable format.
- **Limitation of purpose:** Personal Data will be collected for specific, explicit, and legitimate purposes, and will not subsequently be processed in any way that is incompatible with these purposes.
- **Minimization:** Personal Data will be suitable, relevant and limited only to what is required for the purposes for which it is processed.
- **Accuracy:** Personal Data will be accurate and, if necessary, up to date; taking all reasonable measures to delete or correct any inaccurate Personal Data without undue delay, having regard to the purposes for which it is processed.
- **Storage limitation:** When Personal Data is stored in such a way as to allow Data Subjects to be identified, this storage will not continue beyond the period that is required for the purposes for which the data is processed, except in specific cases set out in legislation.
- **Integrity and confidentiality:** Personal Data will be processed in such a way as to ensure adequate security for Personal Data, including protection against authorized or unlawful Processing and against loss, destruction, or accidental damage, through the application of suitable technical or organizational measures to ensure a level of protection that is commensurate with the risk. All the above is to be in accordance with applicable legislation, the Information Security Policy, and any other standards or policies governing data-related issues within the company.
- **Proactive responsibility:** Puig shall be responsible for compliance with the principles set out in this Policy and shall be able to provide proof of this in accordance with applicable regulations.

<sup>3</sup> “Data Subject” refers to the natural person to whom the personal data refers and whose identity may be determined using said data.



The above-mentioned principles must be considered during the Processing<sup>4</sup> of Personal Data within **Puig**, including but not limited to the following situations:

- When designing and implementing any procedures that involve the Processing of Personal Data.
- In the agreements and duties drawn up with third parties that process Personal Data under **Puig** responsibility.
- In the products and services offered by **Puig**.
- When implementing any systems or platforms that provide access to Personal Data, as well as the collection and/or Processing of said data.

## Commitments

**Puig** adopts the following commitments regarding the principles underpinning this Policy:

- **The creation of a hybrid organizational compliance structure**, comprising the Data Protection Officer, supported by the relevant Executive Committees<sup>5</sup>, and any persons who are appointed within the business divisions, local business units or corporate functions, if applicable. This structure will be adapted to the way the company is organized at any given moment and will be responsible for monitoring the compliance and operations of this Policy and of any controls arising from it.
- **The creation of a control framework** for privacy and Personal Data protection, ensuring adequate management and supervision of **Puig** business activities and processes, to involve the following actions, amongst others:
  - Identifying managers within local business units.
  - Appointing data protection officers when applicable.
  - Carrying out periodic reviews and audits.
  - Keeping a record of Processing-related activities when this is required.
  - Providing any necessary information to the Data Subjects on the Processing of their data.
  - Standardizing the Personal Data processing conducted by third parties via a contract or other applicable legal act.
  - Helping Data Subjects exercise their rights.
  - Adopting suitable safeguards for international transfers of Personal Data.

<sup>4</sup> “Processing” refers to any operation or series of operations conducted on Personal Data or sets of Personal Data, whether this is via automated procedures or otherwise, such as the collection, recording, organizing, structuring, storage, adaptation or modification, extraction, searching, usage, communication via data transmission, dissemination or any other method for granting access, collation, connection, restriction, deletion or destruction.

<sup>5</sup> Within the framework of this Policy, “Executive Committee” refers to the committees made up of various members of the corporate or functional areas of the company, who will provide support to the Data Protection Officer and/or to the local manager to ensure compliance with this Policy, as well as with the duties arising from applicable regulations.



- Carrying out risk and impact assessments regarding data protection, if applicable.
- Data protection by design and by default.
- Training and awareness-raising initiatives focusing on privacy and Personal Data protection.
- **Management of security incidents affecting personal data:** the procedures set out in compulsory internal standards such as the Information Security Policy and other standards governing data-related issues within the company will be followed.
- **Point of contact:** any person may contact the Data Protection Officer at the email address [data.privacy@puig.com](mailto:data.privacy@puig.com) for any questions regarding the processing of personal data or the exercising of rights. They may also use any other means, method and/or platform authorized for this purpose. Furthermore, as part of the **Puig** Speak-Up culture, whenever a potential breach of this Policy is identified **Puig** strongly encourages its reporting via the **Puig** Reporting Channel, accessible at the following link:  
<https://puigreportingchannel.ethicspoint.com/>.

## Governing bodies and persons responsible for this Policy

The following bodies and persons are responsible for this Policy:

- The **Puig Brands, S.A. Board of Directors** has approved this Policy and ensures that sufficient resources are allocated for compliance and for review and improvements where necessary.  
The Board of Directors promotes the monitoring of the principles set out in this Policy via the Audit Committee, the Data Protection Officer, the Executive Committees of the business divisions, and the corporate functions.
- The Puig Brands, S.A. Board of Directors appoints the **Data Protection Officer** to carry out the following functions independently:
  - Monitor the application of and compliance with applicable regulations and this Policy, the procedures that derive from them, their associated processes and controls (including the corresponding audits), and the allocation of responsibilities.
  - Coordinate training and awareness-raising initiatives for employees taking part in Personal Data Processing operations to promote a culture of privacy management and Personal Data protection.



- Provide advice upon request regarding personal data protection impact assessments and supervise their application.
- Cooperate with the applicable supervisory authority.
- Act as a point of contact for the supervisory authority for questions relating to Processing, including prior consultation.
- Report any circumstances or information that may have an impact on compliance with this Policy and the duties arising from regulations to the **Puig** Board of Directors, the Audit Committee, the Executive Committees of the business divisions and/or the corporate functions.

- **Employees** must:

- Comply with this Policy and any other related regulations and with their obligations to confidentiality and secrecy with regard to all information and personal data in particular, to which they have access when carrying out their business activities within **Puig**.
- Cooperate by implementing any measures required and provide information or documentation when requested to demonstrate compliance.
- Report any breach of this Policy using the points of contact mentioned above.
- Attend training and awareness-raising initiatives relating to this Policy.

## Approval, publication and review

This Policy has been approved by the Puig Brands, S.A. Board of Directors on the 25 of November 2024, and came into force at that time. In addition, it has been published and is available on the Intranet, on the **Puig** website, and will be sent to **Puig** employees and other interest groups where applicable.

The Data Protection Officer, in coordination with the relevant areas, will be responsible for publishing, reviewing, updating and improving this Policy where necessary. This Policy supersedes and replaces any previous policy.

In the event of a breach of this Policy, **Puig** will adopt the necessary contractual or legal measures, including those of a disciplinary nature, according to the nature of the breach.