

**PROCEDURE FOR THE HANDLING OF
COMPLAINTS AND CLAIMS
GUIDEBRIDGE SGEIC, S.A.**

PREAMBLE

Law 22/2014 of 12 November, regulating venture capital entities, other closed-ended collective investment undertakings and the management companies of closed-ended collective investment undertakings, establishes the legal framework applicable to management companies of closed-ended collective investment undertakings (SGEICs), setting out, among other matters, the obligations relating to internal organisation, rules of conduct and diligent action in the interest of the managed vehicles and their investors.

Likewise, Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 lays down certain organisational and operating requirements intended to ensure that management companies carry out their activities in a proper and transparent manner and in the best interests of investors.

Furthermore, Technical Guide 1/2026 of the Spanish National Securities Market Commission (CNMV) on internal control in the management of closed-ended vehicles, dated 30 September 2026, sets out the criteria and good practices that the CNMV considers appropriate with regard to organisation, procedures and internal control functions. In particular, point 40(h) of Section Five thereof expressly provides for the periodic review, by the Compliance function, of the policies and procedures relating to the handling of complaints and claims.

Although SGEICs are not, as a general rule, subject to the obligation to establish a Customer Service Department under the terms of Article 29 of Law 44/2002 of 22 November and Order ECO/734/2004 of 11 March, this does not preclude the advisability of establishing appropriate internal mechanisms for the receipt, processing and resolution of any complaints and claims that may be submitted by investors in the managed vehicles or by other eligible persons.

In this context, GUIDEBRIDGE SGEIC, S.A. (hereinafter, the "Company"), having regard to the nature of its activities and to the principle of proportionality, considers it necessary to have an internal procedure in place that enables complaints and claims received to be properly channelled and managed, ensuring their objective analysis, a diligent response to the persons concerned and the appropriate documentation of the actions taken.

This Procedure for the Handling of Complaints and Claims establishes the internal rules applicable to their receipt, registration, processing and resolution, as well as the responsibilities of the persons and departments involved, the monitoring mechanisms and the oversight of compliance therewith by the Compliance function.

Through its approval, the Company seeks to strengthen the protection of investors' interests, facilitate the identification and correction of any shortcomings in the provision of its services and contribute to the continuous improvement of its internal procedures, in accordance with the principles of diligence, transparency, good faith and fair treatment.

CHAPTER I. GENERAL PROVISIONS

Article 1. Purpose and objective

The purpose of this Procedure is to establish the Company's internal rules for the receipt, registration, processing and resolution of complaints and claims that may be submitted by investors in the vehicles managed by the Company, as well as by any other persons falling within its scope, in relation to the activities and services carried out by the Company.

Likewise, the objective of the Procedure is to ensure that complaints and claims received are handled in a diligent, objective and effective manner, by means of mechanisms that allow for their proper management, the communication of the decisions adopted to the persons concerned and the retention of documentary evidence of the actions taken.

The Procedure also establishes the responsibilities of the persons and departments involved, as well as the monitoring and oversight mechanisms intended to identify any shortcomings or recurring incidents and, where applicable, to adopt such corrective measures as may be necessary, with the aim of protecting investors' interests and contributing to the continuous improvement of the Company's internal procedures.

Article 2. Scope

This Procedure applies to complaints and claims submitted by natural or legal persons who have, or have had, a relationship with the Company in their capacity as investors, shareholders or unitholders of the closed-ended collective investment vehicles managed by it, as well as by their duly authorised representatives.

The provisions of this Procedure apply to complaints and claims relating to the activities and services carried out by the Company in the performance of its management, administration and, where applicable, marketing functions in respect of the managed vehicles, provided that they concern the rights or legitimate interests of the complainants.

Furthermore, compliance with the Procedure shall be mandatory for the directors, senior managers and employees of the Company who are involved, directly or indirectly, in the receipt, processing, analysis or resolution of complaints and claims, who shall provide the cooperation necessary to ensure their proper management.

Communications that are unrelated to the activities and services provided by the Company, as well as matters of an exclusively employment, commercial or contractual nature raised by employees, suppliers or other third parties unconnected with its activity of managing closed-ended collective investment vehicles, shall be excluded from the scope of this Procedure, without prejudice to their being processed through the appropriate internal channels.

Article 3. Definitions of complaint and claim

For the purposes of this Procedure, a complaint shall be understood as any expression of dissatisfaction relating to the operation of the Company or the provision of its services, arising from possible shortcomings, delays, lack of attention, inappropriate treatment or other actions that the person concerned considers to be incorrect or negligent, without this necessarily entailing a request for the restoration of rights or interests.

A claim shall be understood as any request made by an investor or eligible person that brings to light a possible infringement of their rights or legitimate interests arising from acts or omissions of the Company relating to the non-performance or defective performance of legal or contractual obligations or of the terms set out in the constitutional documents of the managed vehicles, and whereby an action, rectification or remedy is sought, by computerised, electronic or telematic means, provided that such means allow the documents to be read, printed and retained; complaints or claims may not be submitted by telephone.

Complaints and claims may relate, among other matters, to the management and administration of the vehicles, the information provided to investors, the subscription and capital call processes, distributions, the application of fees and expenses or any other action relating to the activities carried out by the Company.

The classification of a communication as a complaint or a claim shall be based on its content and purpose, irrespective of the designation used by the person concerned, provided that it is submitted through the computerised, electronic or telematic means made available for this purpose by the Company, which allow the documents to be read, printed and retained; complaints or claims may not be submitted by telephone. In case of doubt, the Company shall analyse and process the communication in accordance with the provisions of this Procedure, provided that it falls within its scope.

Article 4. General principles of action

Complaints and claims shall be handled and processed in accordance with the principles of diligence, objectivity, good faith, transparency and fair treatment, endeavouring to ensure an appropriate response to the matters raised by the persons concerned.

In particular, the Company shall observe the following principles:

- a) Diligence and effectiveness: complaints and claims shall be handled and processed with due diligence, endeavouring to resolve them within a reasonable period and avoiding unjustified delays.
- b) Objectivity and impartiality: complaints and claims shall be analysed on the basis of the facts, the available documentation and the applicable legal, contractual and regulatory provisions, avoiding conflict of interest situations that could compromise their proper resolution.
- c) Transparency: responses to the persons concerned shall be clear, comprehensible and sufficiently reasoned, indicating, where appropriate, the actions taken and the decisions adopted.
- d) Confidentiality: the information and documentation obtained during the processing of complaints and claims shall be treated confidentially and in accordance with the applicable personal data protection legislation.
- e) Traceability: the actions taken during the processing of complaints and claims shall be duly documented so as to evidence their management and resolution.

The application of these principles shall be commensurate with the nature, scale and complexity of the activities carried out by the Company, in accordance with the principle of proportionality.

Article 5. Approval, dissemination and amendment of the procedure

The Board of Directors of the Company shall be responsible for approving this Procedure, as well as any amendments that may be made thereto.

The Company makes the Procedure available to those directors, senior managers and employees whose duties relate to the receipt, processing or resolution of complaints and claims, so that they are aware of the responsibilities and guidelines for action applicable to them.

The Compliance function periodically reviews the adequacy of the Procedure in light of the applicable regulations and the characteristics of the activity carried out by the Company and, where necessary, proposes the appropriate amendments.

Amendments to the Procedure require the approval of the Board of Directors prior to their implementation.

CHAPTER II. ORGANISATION AND RESPONSIBILITIES

Article 6. Person responsible for handling complaints and claims

The Company has appointed a person responsible for coordinating the receipt, processing and resolution of complaints and claims submitted in relation to the activities and services carried out by the Company.

This appointment reflects the organisational structure, the resources available and the nature of the Company's activities, and the establishment of a specific customer service department or unit is not required.

The appointed person coordinates the actions necessary for the proper processing of complaints and claims, requesting, where required, the cooperation of the departments or persons involved in the facts under analysis.

The appointed person performs their duties with objectivity and impartiality, ensuring that any links they may have with the commercial or operational departments or with the Company's governing bodies do not compromise the proper processing and resolution of complaints and claims.

Where the complaint or claim directly concerns the appointed person, where that person has been involved in the facts giving rise to the claim, or where any other circumstance arises that may compromise their impartiality, they shall refrain from taking part in its resolution, which shall be undertaken by another person designated by the Company's management who is not affected by such conflict.

The Compliance function periodically oversees compliance with this Procedure, without such oversight necessarily entailing its direct involvement in the processing or resolution of complaints and claims.

Article 7. Duties and responsibilities

The person responsible for handling complaints and claims is entrusted with the following duties:

- a) Receiving and registering complaints and claims submitted to the Company, assigning each of them a specific reference code by which it may be identified, and recording the date of receipt, the identity of the complainant and the subject of the communication.
- b) Analysing complaints and claims received, verifying that they fall within the scope of this Procedure and that they contain the information necessary for their processing.
- c) Obtaining from the departments or persons involved the information, documentation and clarifications necessary to analyse the facts giving rise to the complaint or claim.
- d) Coordinating the processing of complaints and claims, endeavouring to ensure that they are handled and resolved diligently and within the time limits established in this Procedure.
- e) Drafting, or coordinating the preparation of, responses to complainants, endeavouring to ensure that the decisions adopted are duly substantiated and communicated to the persons concerned.
- f) Keeping up to date the documentation relating to complaints and claims received, including the actions taken, the responses issued and, where applicable, the measures adopted.
- g) Reporting to the Company's management and, where appropriate, to the Compliance function, those complaints and claims which, by reason of their nature or significance, may reveal possible regulatory breaches, conflicts of interest or shortcomings in internal procedures.

The resolution of complaints and claims is the responsibility of the appointed person, without prejudice to the involvement of other bodies or officers of the Company where the nature of the facts or the measures proposed require their participation or authorisation.

The Compliance function periodically oversees the proper application of this Procedure, in accordance with the provisions of CNMV Technical Guide 1/2026, without necessarily assuming the operational functions of handling and resolving complaints and claims.

Article 8. Resources and channels

The Company has the organisational and material resources necessary for the receipt and processing of complaints and claims, commensurate with the nature, scale and complexity of its activities.

Complaints and claims may be submitted in writing, by e-mail sent to the address designated by the Company for this purpose, or by written postal communication sent to its registered office.

Information on the channels available for the submission of complaints and claims, including the relevant e-mail and postal addresses, is available on the Company's website.

The person responsible for handling complaints and claims has access to the information and documentation necessary for the performance of their duties and may request the cooperation of the Company's various departments where required for the analysis and resolution of the matters raised.

The resources and channels used make it possible to keep a record of the communications received, of the actions taken during their processing and of the responses provided to the persons concerned.

Article 9. Cooperation of the Company's departments

The Company's various departments and units cooperate with the person responsible for handling complaints and claims in the performance of their duties, providing the information, documentation and clarifications necessary for the proper analysis and resolution of the matters raised.

Where a complaint or claim concerns the actions of a specific department or unit, the head thereof shall provide such background information and explanations as may be necessary to clarify the facts and determine, where applicable, the measures to be adopted.

Cooperation between the Company's various departments is carried out in accordance with the principles of diligence, coordination and confidentiality, endeavouring to avoid unjustified delays in the processing of complaints and claims.

Where the analysis of a complaint or claim reveals possible regulatory breaches, conflicts of interest or material shortcomings in internal procedures, the person responsible for its processing shall bring these circumstances to the attention of the Compliance function for its assessment and, where applicable, follow-up.

Article 10. Oversight by the Compliance function

The Compliance function periodically oversees the proper application of this Procedure, in accordance with the applicable regulations and with CNMV Technical Guide 1/2026 on internal control in the management of closed-ended vehicles.

In the performance of its duties, it reviews the handling of complaints and claims received by the Company, verifying, among other aspects, their proper registration, processing and resolution, as well as the correct implementation of the measures adopted where incidents have been identified.

It also analyses those complaints and claims that may reveal possible regulatory breaches, conflicts of interest or shortcomings in internal procedures, assessing, where applicable, the need to propose corrective measures.

The results of the reviews carried out and, where applicable, the incidents and recommendations identified are included in the periodic reports of the Compliance function addressed to the Board of Directors, without the need to prepare a specific report on complaints and claims.

The oversight carried out by the Compliance function does not replace the responsibilities assigned to the person responsible for handling complaints and claims with regard to their processing and resolution.

CHAPTER III. PROCEDURE FOR SUBMISSION, PROCESSING AND RESOLUTION

Article 11. Submission of complaints and claims

Complaints and claims may be submitted by the persons falling within the scope of this Procedure, either directly or through a duly authorised representative, via any of the channels made available by the Company and set out in Article 8.

Submissions shall be made in writing, on paper or by electronic means, in such a way as to provide a record of their content and of the identity of the complainant.

Complaints and claims shall contain, as a minimum, the following information:

- a) Full name or corporate name of the complainant and, where applicable, of their representative, together with the contact details necessary for the relevant communications.
- b) Identification of the managed vehicle to which the complaint or claim relates, where applicable.
- c) Description of the facts giving rise to the complaint or claim, indicating, as far as possible, the relevant dates and circumstances.
- d) Grounds for the complaint or claim and, where applicable, the specific request made by the person concerned.

- e) Any documentation that the complainant considers relevant to substantiate the facts set out, where available.
- f) A declaration that the complainant is not aware of the subject matter of the complaint or claim being the subject of administrative, arbitral or judicial proceedings.
- g) Place, date and signature.

The absence of any of the foregoing information or documents shall not necessarily prevent the processing of the complaint or claim, provided that the information supplied makes it possible to identify the person concerned and to understand the facts raised. Where necessary, the person responsible for its processing may request such additional information or documentation as they consider relevant.

The submission of complaints and claims shall be free of charge for the person concerned.

Article 12. Receipt, registration and acknowledgement of receipt

Complaints and claims received by the Company are forwarded to the person responsible for handling them, who registers and processes them in accordance with the provisions of this Procedure.

The Company maintains an internal register of complaints and claims received, which records, as a minimum, the following information:

- a) Date of receipt of the complaint or claim and internal reference.
- b) Identification of the complainant and, where applicable, of the managed vehicle concerned.
- c) Summary description of the facts and grounds giving rise to the complaint or claim.
- d) Processing status and actions taken.
- e) Date and content of the decision or response provided to the person concerned.
- f) Where applicable, the corrective measures adopted.

The person responsible for handling complaints and claims acknowledges receipt of the communications received, preferably by the same means as that used by the person concerned, recording their receipt, the reference code and the date of submission.

Where a complaint or claim is received through a department or person other than the appointed person, it shall be forwarded to the latter for registration and processing, without the person concerned being required to resubmit it.

The information and documentation relating to each complaint or claim are retained in such a way as to evidence the actions taken and the outcome of its processing, in accordance with the Company's internal document retention rules.

Article 13. Admission for processing and grounds for exclusion

Once the complaint or claim has been received and registered, the person responsible for handling it verifies that it falls within the scope of this Procedure and that it contains the information necessary for its proper processing.

Where the information supplied is insufficient to identify the complainant, ascertain the facts or analyse the matter raised, the person responsible may request such clarifications or supplementary documentation as they consider necessary.

Complaints and claims falling within any of the following cases may be excluded from processing under this Procedure:

- a) Where the facts raised are unrelated to the activities or services carried out by the Company or do not affect the rights or legitimate interests of the persons falling within its scope.
- b) Where they relate to matters of an exclusively employment, commercial or contractual nature unconnected with the activities of managing closed-ended collective investment vehicles.
- c) Where the same facts and claims are the subject of judicial, administrative or arbitral proceedings, or have been settled by a final decision, without prejudice to any actions that may be incumbent upon the Company in such proceedings.

- d) Where they reproduce previous complaints or claims by the same person concerning identical facts and claims that have already been analysed and resolved, without providing any new relevant elements.
- e) Where the information provided does not make it possible to identify the complainant or to determine the facts giving rise to the complaint or claim, and it is not possible to complete such information.
- f) Where the limitation period has expired for the actions or rights which, in accordance with the provisions of the contracts or the applicable regulations, may be exercised by the person submitting the claim or complaint in question or by the person on whose behalf it is submitted, and in any event where a period of five years has elapsed since the occurrence of the facts without the claim or complaint having been submitted.

Where it is determined that a complaint or claim cannot be processed under this Procedure, the person responsible shall inform the person concerned of this circumstance, briefly stating the reasons for such decision.

The exclusion of a complaint or claim from this Procedure does not limit any rights that the person concerned may have to bring such actions as they deem appropriate under the applicable regulations.

Article 14. Analysis and processing of complaints and claims

Once the complaint or claim has been admitted for processing, the person responsible for handling it analyses the facts set out and the documentation available in order to determine the circumstances giving rise to it and to assess the merits of the requests made by the person concerned.

To this end, they may obtain from the Company's various departments or units such information, documentation and clarifications as may be necessary, and may request supplementary information from the complainant where they consider it appropriate.

The analysis shall take into account the applicable regulations, the contractual terms, the regulations or articles of association of the managed vehicles and the Company's internal procedures that are relevant to the matter raised.

Where the processing reveals possible regulatory breaches, conflicts of interest or material shortcomings in internal procedures, the person responsible for handling complaints and claims shall bring these circumstances to the attention of the Compliance function for its assessment.

During processing, a record shall be kept of the actions taken and of the documentation relevant to substantiate the decision adopted.

The procedure shall be conducted with due diligence, endeavouring to resolve the matters raised objectively and avoiding unjustified delays.

Article 15. Time limit for resolution

Complaints and claims received by the Company are processed with due diligence, endeavouring to provide a response to the person concerned as soon as possible and avoiding unjustified delays.

As a general rule, the Company sets an internal reference period of one month from the date of receipt for the resolution of complaints and claims, without prejudice to any specific time limits that may be required under the applicable regulations.

Where, owing to the complexity of the facts, the need to obtain additional information or other justified circumstances, it is not possible to resolve the complaint or claim within that period, the person responsible for its processing shall inform the person concerned of this circumstance, stating the reasons for the delay and endeavouring to provide a response as soon as possible.

The established period constitutes an internal operating criterion of the Company and does not entail the application of the specific time-limit regime provided for the customer service departments of entities subject to the regulations governing such services.

Article 16. Resolution and communication to the complainant

Once the analysis of the complaint or claim has been completed, the person responsible for handling it adopts the appropriate decision, taking into account the facts established, the documentation examined and the applicable legal, contractual and internal provisions.

The decision shall be sufficiently reasoned, clearly state the conclusions reached and respond to the matters raised by the person concerned.

The decision adopted shall be communicated to the complainant or, where applicable, to their duly authorised representative, in writing and preferably by the same means as that used to submit the complaint or claim, unless the person concerned has indicated another means of communication.

Where the decision is wholly or partly favourable to the complainant's requests, it shall indicate, where appropriate, the actions or measures that the Company has adopted or intends to adopt to address them.

Where the complaint or claim is wholly or partly rejected, the response shall include an explanation of the reasons on which the decision is based, without prejudice to the rights of the person concerned to bring such actions as they deem appropriate under the applicable regulations.

The Company keeps a record of the decision adopted, its date and the communication made to the complainant, including such documentation in the relevant file.

Article 17. Withdrawal and termination of the procedure

The complainant may withdraw their complaint or claim at any stage of its processing by notifying the Company through any of the channels made available. Withdrawal shall result in the termination of the procedure and the closure of the file, with a record being kept of such circumstance.

Likewise, where, during the processing of a complaint or claim, the Company adopts measures that satisfactorily resolve the matter raised and the person concerned expresses their agreement, the procedure shall be deemed terminated.

The procedure may also be terminated by notifying the person concerned of the decision adopted in accordance with the provisions of the preceding Article.

In any of these cases, the person responsible for handling complaints and claims shall record the reason for termination and the actions taken, retaining the relevant documentation in the file.

The termination of the procedure shall not prevent the Company from adopting, where necessary, corrective measures arising from the facts identified during its processing.

Article 18. Monitoring and implementation of the measures adopted

Where the resolution of a complaint or claim gives rise to the need to adopt specific measures, the person responsible for handling it shall coordinate with the departments involved the actions necessary for their implementation.

The departments or units responsible for applying such measures shall carry out the relevant actions within the scope of their competences, informing the person responsible for handling complaints and claims of their completion.

Where the measures adopted are intended to remedy possible regulatory breaches, conflicts of interest or material shortcomings in internal procedures, the Compliance function shall carry out the appropriate follow-up in the exercise of its oversight duties.

The person responsible for handling complaints and claims shall record in the relevant file the measures adopted and, where applicable, their implementation, so as to evidence the proper handling of the complaint or claim.

CHAPTER IV. FINAL PROVISIONS

Article 19. Confidentiality and data protection

The Company ensures that the processing of personal data obtained in connection with the receipt, registration, processing, analysis and resolution of complaints and claims is carried out in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, the General Data Protection Regulation (hereinafter, "GDPR"), Spanish Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (hereinafter, "LOPDGDD"), and any other applicable provisions.

Data controller and purpose of processing

The Company, in its capacity as data controller, processes the personal data provided by complainants, their representatives and, where applicable, other persons involved in the facts giving rise to the complaint or claim, exclusively for the purposes of receiving, managing, analysing, processing and resolving the matters raised, as well as for monitoring the measures adopted and complying with the applicable legal obligations.

The processing of personal data is based on the appropriate legal bases under Article 6 of the GDPR, having regard to the nature of the relationship with the data subject and the specific circumstances of the processing, including, where applicable, compliance with legal obligations, the performance of a contractual relationship or the pursuit of the legitimate interests of the Company or of third parties, provided that the legally established requirements are met.

Principles applicable to processing

The processing of personal data complies with the principles set out in Article 5 of the GDPR and, in particular, the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality.

The Company limits the collection and use of personal data to such data as are adequate, relevant and necessary for the handling of complaints and claims, avoiding the processing of information unrelated to the stated purposes.

Confidentiality and information security

The information and documentation obtained during the processing of complaints and claims are confidential. Access to the files is restricted to those persons who, by reason of their duties, are required to take part in their receipt, analysis, processing, resolution or oversight.

Directors, senior managers, employees and any other persons with access to such information are subject to the duty of confidentiality and professional secrecy, an obligation which continues to apply even after the termination of their relationship with the Company, in accordance with Article 5 of the LOPDGDD.

The Company applies technical and organisational security measures appropriate to the level of risk associated with the processing, in accordance with Article 32 of the GDPR and with its internal information security policies and procedures, in order to preserve the confidentiality, integrity and availability of personal data and to prevent their alteration, loss, destruction, unauthorised access or improper disclosure.

Disclosure of data to third parties

Personal data may only be disclosed to third parties where there is a legal basis legitimising such disclosure, where it is necessary for the proper handling of the complaint or claim or where it is required under the applicable regulations.

In particular, they may be disclosed to the competent administrative, judicial or supervisory authorities, including the Spanish National Securities Market Commission (CNMV), where there is a legal obligation or a legitimate request that so justifies.

Where the handling of complaints and claims requires the involvement of external service providers that access personal data on behalf of the Company, such involvement shall comply with Article 28 of the GDPR, and the relevant data processing agreement shall be entered into where appropriate.

Retention of personal data

The personal data and documentation relating to complaints and claims are retained for as long as necessary to fulfil the purposes for which they were collected and to comply with the applicable legal retention obligations.

Once such periods have elapsed, the data shall be erased or, where appropriate, blocked in accordance with Article 32 of the LOPDGDD for the periods during which liability may arise from the processing or it is necessary to retain them for the establishment, exercise or defence of legal claims, and shall be definitively deleted when appropriate.

Rights of data subjects

Data subjects may exercise the following rights, under the terms and conditions set out in Articles 15 to 22 of the GDPR:

- a) Right of access: to obtain confirmation as to whether or not the Company is processing their personal data and, where that is the case, to access such data and the legally required information regarding its processing.
- b) Right to rectification: to request the correction of inaccurate or incomplete personal data concerning them.
- c) Right to erasure: to request the deletion of their personal data where any of the circumstances provided for in the applicable regulations apply.
- d) Right to object: to object to the processing of their personal data in the cases and under the conditions established by law.
- e) Right to restriction of processing: to request the restriction of the processing of their personal data where any of the circumstances provided for in the GDPR apply.
- f) Right to data portability: to receive the personal data they have provided to the Company in a structured, commonly used and machine-readable format, and to request their transmission to another controller, where the legally established requirements are met.
- g) Right not to be subject to automated individual decision-making: not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect them, except in the cases permitted by law.

Data subjects may exercise these rights by submitting a request to the Company through the channels indicated in its data protection information. The Company handles such requests in accordance with the procedures and time limits established in the regulations in force, taking into account any exceptions and limitations that may apply.

The exercise of these rights does not affect the Company's obligation to retain certain personal data where there is a legal obligation justifying it or where its processing is necessary for the establishment, exercise or defence of legal claims.

Furthermore, data subjects have the right to lodge a complaint with the Spanish Data Protection Agency (AEPD), as the competent supervisory authority, where they consider that the processing of their personal data infringes the applicable regulations.

Duty to inform

The Company provides data subjects with information on the processing of their personal data under the terms of Articles 12, 13 and 14 of the GDPR, as appropriate, through the data protection information means and documents made available for this purpose, ensuring that such information is concise, transparent, intelligible and easily accessible.

Article 20. Entry into force

This Procedure enters into force on the date of its approval by the Board of Directors of the Company and applies from that moment to the complaints and claims falling within its scope.

The Procedure shall remain in force until the Board of Directors resolves to amend or replace it, in accordance with Article 5.