

PRIVACY POLICY

PRIVACY POLICY AND DATA PROTECTION

I. INTRODUCTION

In accordance with Article 5 of Law No. 1/2016 dated July 22 on Personal Data in Equatorial Guinea, which emphasizes the fundamental role of the individual as the foundation of society, deserving respect and protection for their honor, dignity, integrity, and personal privacy in all aspects and spheres of social life. In compliance with this, **Elite Construcciones S.L.** establishes a conscious policy regarding the responsibility it holds for the Treatment and Protection of Personal Data.

The application of these policies is mandatory for all individuals or legal entities that handle personal data registered in the various databases of the Company, aiming to provide the necessary baseline for fulfilling legal obligations related to data protection.

Elite Construcciones S.L. hereby informs that the personal data obtained through operations, contractual relationships, or any other means involving the Entity will be treated in accordance with the principles set forth in Law No. 1/2016 dated July 22 on Personal Data in Equatorial Guinea and other related regulations.

The organization reserves the right to modify this Policy to adapt it to legislative changes, jurisprudential criteria, industry practices, or the Entity's interests.

II. DATA PROCESSING RESPONSIBLE ENTITY

The entity **Elite Construcciones S.L.**, is the Data Processing Controller, with its registered office in Bioko Norte, Punta Europa, Malabo, Equatorial Guinea.

- **Industry:** Construction Company Serving Oil and Gas sector.
- **Contact email:** elite@eliteconstruction.com.
- **Contact phone:** (+240) 555 696 400.
- **Website:** <https://www.elite-equatorialguinea.com>.

The organization specializes in supplying labor for construction, logistics, plant rental, offshore and onshore operations with years of experience among our expert management team. The company has gained recognition for undertaking large and complex projects, fostering innovation, and adopting emerging technologies.

This privacy policy provides information on how the Company will use personal data as a user of the website.

III. SCOPE AND EXTENT

Our Data Processing and Protection Policy applies to all databases and files containing personal data processed or subsequently used by our company or third-party collaborators adhering to a comparable data protection policy.

It is essential to note that our primary focus is on protecting the interests and needs of information and data owners, prioritizing compliance with the current regulations on Personal Data Protection in Equatorial Guinea and any requirements arising from the principle of demonstrated responsibility.

All partners, contractors, subcontractors, and third parties associated with us who process personal data must comply with this policy and the established procedures for personal data processing.

This policy is directed at all individuals or legal entities whose data will be processed, outlining their rights that they may exercise at any time.

IV. GUIDING PRINCIPLES IN OUR DATA PROTECTION POLICY

Our privacy and data protection policy is based on the following principles:

a) Principle of Legality: Data processing is a regulated activity; hence, we adhere to the provisions of Law No. 1/2016 dated July 22 on Personal Data in Equatorial Guinea, regulatory decrees, and other related provisions.

b) Principle of Purpose: Data processing will be for legitimate purposes in accordance with the Constitution and the Law, and the purpose will be communicated to the Data Subject.

c) Principle of Freedom: We will process your data only with the prior, express, and informed consent of the Data Subject. Personal data cannot be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate relieving consent.

e) Principle of Transparency: We guarantee the Data Subject's right to request information about the existence of data concerning them from Elite Construcciones at any time and without restrictions.

f) Principle of Restricted Access and Circulation: Elite Construcciones adheres to limits derived from the nature of personal data and legal provisions. Personal data, except for public information, cannot be available on the Internet or other mass media unless access is technically controllable to provide restricted knowledge only to Data Subjects or authorized third parties.

g) Principle of Security: Information subject to processing by the company is handled with technical, human, and administrative measures necessary to ensure the security of records, preventing their tampering, loss, consultation, unauthorized or fraudulent use, or access.

h) Principle of Confidentiality: We ensure the confidentiality of information, even after the termination of the relationship involving data processing. Communication of personal data will only occur when it corresponds to the activities authorized by law and under its terms. Elite Construcciones will treat the personal data of Data Subjects with absolute confidentiality, using them exclusively for the purposes indicated in the preceding sections. The company has implemented the necessary technical and organizational

security measures to ensure the security of personal data, preventing their alteration, loss, processing, and/or unauthorized access.

i) Principle of Temporality: Personal data will be retained only for a reasonable and necessary time to fulfill the purposes that justified the processing, considering applicable legal obligations and administrative, accounting, tax, legal, and historical aspects of the information. Data will be retained when necessary for legal or contractual compliance. Once the processing purpose and the aforementioned terms are fulfilled, the data will be deleted.

k) Principle of Necessity: The personal data processed by Elite Construcciones are strictly necessary and must be adequate, relevant, and limited to fulfilling the purposes pursued in the relationship with Data Subjects.

l) Principle of Accuracy: The personal data processed will be accurate and, if necessary, updated. Furthermore, all necessary measures will be taken for the deletion or updating of outdated or inaccurate data.

V. PURPOSE OF PROCESSING YOUR PERSONAL DATA

The collection and automated processing of personal data aim to maintain commercial relationships and perform tasks related to information, training, advice, and other activities inherent to this sector.

Also, personal data collected through the organization's forms made available to users will, depending on the specific case, respond to managing and addressing requests for information, doubts, complaints, or suggestions regarding publications or any services, activities, acts, or events provided, offered, sponsored, and/or endorsed by the organization.

VI. USE OF COOKIES, SOCIAL MEDIA, AND EMAIL

Our website www.elite-equatorialguinea.com uses cookies to gather information about website usage. These cookies may be used to facilitate your navigation, distinguish you from other users, and analyze your browsing habits within the site. The following policy aims to inform you clearly and precisely about the cookies used on our website.

The organization has various profiles on social media platforms to promote events and interact with followers. Users who choose to voluntarily follow or be friends with the organization on these platforms express their consent for the processing of their personal data related to their profiles, for the purpose of participating in the interactions inherent to social media. It is important to note that the organization does not collect information from social media for purposes other than those mentioned above.

Personal data obtained from the receipt and/or exchange of emails will be used to address and respond to information or consultation requests, manage commercial or professional contacts and relationships resulting from such correspondence, and for the maintenance, if necessary, of a contractual relationship.

VII. STORAGE AND CANCELLATION OF PERSONAL DATA

Your personal data will be stored only for a reasonable and necessary time to fulfill the purposes that justified the processing, considering applicable legal obligations and administrative, accounting, tax, legal, and historical aspects of the information. Data will be retained when necessary for legal or contractual compliance.

Personal data will be canceled following the legally established procedure when they are no longer necessary or relevant for the purpose for which they were obtained and recorded.

In case the stored data are inaccurate or incomplete, they will be canceled and replaced with the corresponding rectified or completed data.

VIII. TRANSFER OF PERSONAL DATA

Personal data may be transferred or communicated to third parties in cases necessary for the development, control, and fulfillment of the expressed purpose(s), as provided by law.

In the case of data processing by third parties, this transfer will be communicated to the interested party for their consent, providing the purpose and the activity carried out by this third party. The obligations and responsibilities established by law arise from this transfer.

Among the personal data that may be collected and stored by the company are, without being exclusive:

- a) **Personal Identification Information:** may include names, addresses, phone numbers, email addresses, birthdates, and personal identification numbers.
- b) **Financial Information:** may collect financial information such as bank details, income information, and assets, when relevant to the company.
- c) **Employment and Educational Background:** may collect information about the employment and educational history of individuals involved.
- d) **Health Information:** may be necessary to collect health-related information for managing health policies, injuries, sick leaves, and aspects relevant to work performance.
- e) **Social Media Data:** may collect information from social media profiles if related to the individual's business sphere.
- f) **Witness and Third-Party Information:** may collect personal data from witnesses, opposing parties, experts, and other third parties involved in a case.

XIX. DATA PROTECTION RIGHTS

All citizens have the following rights in the processing of their personal data:

- a) **Right of Access:** Within twelve months, the interested user has the right to request and obtain, free of charge, through mere consultation or in writing, a copy of their personal data information subject to processing, the origin of such data, and communications made or planned with the same.

- b) **Right to Challenge Assessments:** The interested user has the right to obtain information about the criteria for assessing their personal data and behavior, as well as the programs used for processing them.
- c) **Right to Consult the General Data Protection Registry:** Anyone may consult, examine, and obtain necessary and desired information about the processing of their personal data in the General Data Protection Registry.
- d) **Right to Rectification and Cancellation:** The interested user has the right to rectify and request the cancellation of their personal data when they are inaccurate or incomplete. The data controller will comply within fifteen days from the date of the request.
- e) **Right to Data Portability:** The user is entitled to request their data to be returned for transmission to another data controller. In this case, upon request of the interested party, the data will be transmitted between controllers when technically possible.
- f) **Right to Compensation:** The interested user has the right to compensation for damages or injuries caused by the data controller's processing of their data.

Ways to exercise these rights:

The user, as an interested party or owner of personal data, can exercise these rights, acting on their behalf. Similarly, these rights can be exercised with the organization through another person acting as a legally accredited legal representative or volunteer.

These rights can be exercised at any time and free of charge through the following methods:

- **Postal Mail:** Submit the request by sending it to the following postal address: Bioko Norte, Punta Europa, Malabo, Equatorial Guinea.
- **Internet:** Submit the request by sending an email to the following address: elite@eliteconstruction.com.

Additional Information:

The organization will analyze whether the request complies with the law or not. The decision taken will be communicated to the petitioner, proceeding accordingly: if granted, appropriate measures will be taken according to the exercised right; if denied, the legally provided recourse system will be indicated.

In case the requests are manifestly unfounded or excessive, the organization may: (I) Charge a fee proportional to the administrative costs incurred (II) Refuse to act.

X. INTERNATIONAL PROCESSING OF PERSONAL DATA

Personal data subject to processing cannot be communicated, transferred, or transmitted to other countries that do not provide a level of legal protection equivalent to that established in Law No. 1/2016 on Personal Data Protection, unless authorized by the Data Protection Regulatory Body or falls within one of the exceptions mentioned in Article 28 of the mentioned Law.

The level of protection will be assessed considering the circumstances involved in the communication, transfer, or transmission, and based on the personal data requested.

XI. ADDITIONAL INFORMATION ON DATA PROTECTION

During its operations, the data handled by the company may vary depending on the type of projects it manages and the nature of its business.

- a) **Employee Information:** Personal data of employees, including names, addresses, phone numbers, birthdates, social security numbers, information about bank accounts, and details about work and education history.
- b) **Contractors and Subcontractors Information:** Contact information and business details of contractors and subcontractors working on construction projects.
- c) **Customer Information:** Contact information for customers, including names, addresses, phone numbers, and email addresses.
- d) **Supplier Information:** Contact information and business details of suppliers, including names, addresses, and phone numbers.
- e) **Design and Planning Information:** Data related to the planning and design of construction projects, such as plans, specifications, and any other technical information.
- f) **Health and Safety Information:** In the context of occupational safety, the company may collect information related to the health and safety of workers, such as accident or incident records and occupational risk assessments.
- g) **Access and Security Records:** Data related to the security of construction sites, such as access records, security camera images, and other data related to physical security.
- h) **Equipment and Machinery Information:** Data related to the management of equipment and machinery, such as maintenance records, serial numbers, and ownership details.
- i) **Payment and Billing Information:** Financial information related to payments, billing, and business transactions, including bank details and billing details.
- j) **Legal and Contractual Information:** Data related to contracts, legal agreements, licenses, and permits necessary to carry out construction projects.