

DATA PROTECTION, CYBERSECURITY AND TECHNOLOGY CORPORATE POLICY

Corporate Policy

OBJECTIVE

Establish principles, guidelines, measures, practices, powers, and responsibilities to ensure Pantaleon Group's compliance with legal obligations and manage technological and information security risks for its information assets, activities, and processes.

PURPOSE

Protect and secure Pantaleon Group's IT assets against threats and vulnerabilities that could disrupt business continuity.

IMPLICATIONS

- Pantaleon Group business units are subject to compliance with UK regulations and local legislation of the countries in which we operate on data protection, data processing, cybersecurity, technology and adopted corporate standards.
- Pantaleon Group business units shall manage technological and security risks information in compliance with local legislation and corporate standards to ensure business continuity, using regulations, policies, manuals, procedures and training or on-going education.
- Pantaleon Group business units must safeguard their servers, in a preventive manner and make backup copies on authorized media and implement contingency plans in the event of technological or information security incidents.
- In the event of a cyber-attack, ransomware, or data hijacking, the senior management of Pantaleon Group and the affected business unit will establish an Emergency Committee to make case-specific decisions.
- Each Pantaleon Group business unit is responsible for processing personal data and third-party information, ensuring their integrity, confidentiality, and availability in accordance with applicable laws and contracts.
- Pantaleon Group business units must implement maintenance plans and periodic monitoring of their IT infrastructure and computer assets to prevent vulnerabilities in the network, striving to keep the entire information technology infrastructure and inventory up to date.
- The senior management in each business unit of Pantaleon Group must implement measures to ensure the integrity and classification of data, its protection and privacy, whether it is their own or from third parties.
- The senior management in each business unit of Pantaleon Group must train their personnel in information security, including cybersecurity, data protection, and IT asset usage.