

COMMITMENT TO PERSONAL DATA PROTECTION

OUR COMMITMENT TO PERSONAL DATA PROTECTION: "INFORMED INDIVIDUALS AND PROTECTED DATA"

The Management / Governing Body of **VEN & PLAY A GOLF, S.L.** (hereinafter, the data controller), assumes maximum responsibility and commitment to the establishment, implementation, and maintenance of this Data Protection Policy. This ensures continuous improvement of the data controller with the aim of achieving excellence in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, regarding the protection of individuals concerning the processing of personal data and the free movement of such data. This regulation repeals Directive 95/46/EC (General Data Protection Regulation) (OJEU L 119/1, 04-05-2016), and Spanish regulations on the protection of personal data (Organic Law, specific sector legislation, and its development regulations).

The Data Protection Policy of **VEN & PLAY A GOLF, S.L.** is based on the principle of proactive responsibility, according to which the data controller is responsible for complying with the regulatory and jurisprudential framework governing said policy. The controller must be able to demonstrate this compliance to the competent supervisory authorities.

In this regard, the data controller will adhere to the following principles, which should serve as a guide and reference framework for all its staff in the processing of personal data:

En tal sentido, el responsable del tratamiento se regirá por los siguientes principios que deben servir a todo su personal como guía y marco de referencia en el tratamiento de datos personales:

1. Data Protection by Design: The data controller will implement, both when determining the means of processing and during the processing itself, appropriate technical and organizational measures, such as pseudonymization, designed to effectively apply data protection principles. These include data minimization and integrating necessary safeguards into the processing.
2. Data Protection by Default: The data controller will apply appropriate technical and organizational measures to ensure that, by default, only personal data necessary for each specific purpose of the processing is processed.
3. Data Protection throughout the Information Lifecycle: Measures ensuring the protection of personal data will be applicable throughout the entire lifecycle of the information.
4. Lawfulness, Fairness, and Transparency: Personal data will be processed lawfully, fairly, and transparently in relation to the data subject.

5. Purpose Limitation: Personal data will be collected for specified, explicit, and legitimate purposes and will not be processed further in a manner incompatible with those purpose.
6. Data Minimization: Personal data will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
7. Accuracy: Personal data will be accurate and, if necessary, kept up to date; all reasonable measures will be taken to promptly delete or rectify inaccurate personal data concerning the data subject.
8. Limitation of Storage Period: Personal data will be kept in a form that permits identification of data subjects for no longer than necessary for the purposes of processing personal data.
9. Integrity and Confidentiality: Personal data will be processed in a manner ensuring appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, through the application of appropriate technical or organizational measures.
10. Information and Training: One key aspect of ensuring the protection of personal data is the training and information provided to personnel involved in data processing. Throughout the information lifecycle, all personnel with access to the data will be adequately trained and informed about their obligations regarding compliance with data protection regulations.

The Data Protection Policy of **VEN & PLAY A GOLF, S.L.** is communicated to all personnel of the data controller and made available to all interested parties.

As a result, this Data Protection Policy involves all personnel of the data controller, who must be aware of it and embrace it, considering it as their own. Each member is responsible for implementing and verifying the data protection rules applicable to their activities. They are also responsible for identifying and contributing any opportunities for improvement they deem appropriate to achieve excellence in compliance.

This Policy will be reviewed by the Management / Governing Body of **VEN & PLAY A GOLF, S.L.**, as often as deemed necessary, to ensure alignment with the current provisions regarding the protection of personal data.