

Navantia UK is part of Navantia Group which is a technological leader in shipbuilding and the integration of complex systems. This summary Data Protection Policy affirms that **Navantia UK is committed to compliance** with the UK General Data Protection Regulation and the Data Protection Act 2018 (together, "**Data Protection Law**"), and sets out the **expectations on Navantia Colleagues** in ensuring such compliance. This summary Data Protection Policy should be read alongside Navantia UK's Data Privacy Procedure, Procedure for Exercising Rights, Personal Data Breach Management Procedure and data retention policy and schedule, as in force from time to time (together, the "**Data Protection Procedures**").

This Data Privacy Policy is applicable to (i) all Navantia UK directors, employees, agents and subcontractors, and those of Navantia Group when operating in the UK or on behalf of Navantia UK ("**Navantia Colleagues**"); and (ii) the processing of personal data by data processors on behalf of Navantia UK. This policy is sponsored by the board of directors and implemented by the Data Protection Compliance Function (*see Annex 01 to the Data Privacy Procedure*).

Navantia UK respects the privacy of the individuals whose personal data it controls. Navantia UK works proactively with the Information Commissioners Office (the "**ICO**") and third-party data processors to maintain appropriate protection of personal data. Navantia UK recognises the importance of compliance with Data Protection Law and giving proper effect to the principles therein.

Lawfulness, fairness and transparency: Navantia UK ensures that data is processed in accordance with Data Protection Law and balances its interests in processing personal data with data subjects' privacy rights. It provides easy-to-understand explanations of how personal data is used.

Purpose limitation: Navantia UK will only process personal data for specified, explicit and legitimate purposes.

Data minimisation: Navantia UK processes only the personal data strictly necessary for the intended purpose, and minimises the sharing of such data with approved third parties.

Accuracy: Navantia UK has thorough procedures in place to maintain the accuracy of personal data.

Data retention: Navantia UK will either anonymise or securely destroy personal data at the end of the applicable retention period for which it is permitted or required to hold such data.

Security: Navantia UK has strict security controls in place to protect personal data and ensures that such data is only accessible to those individuals who require it for the intended purpose.

Navantia UK respects the **rights of each data subject**, as enshrined in Data Protection Law. All requests to exercise such rights are handled in accordance with the Procedure for Exercising Rights, and within the relevant period for response (save where a lawful exception applies).

In the event of a **personal data breach**, Navantia UK has procedures to (i) **identify** the breach, (ii) **assess** the cause and impact, (iii) **mitigate** the effects in the interests of protecting data subjects; and (iv) **report** to the ICO and affected data subjects where necessary (*see the Personal Data Breach Management Procedure*). Each Navantia Colleague is expected to:

- Review and comply with the Data Protection Procedures.
- Refer to the Data Protection Compliance Function if personal data is (i) at risk, (ii) processed for improper purposes, or (iii) handled in breach of Data Protection Law.
- Complete all mandatory training to understand their responsibilities regarding personal data and responses to data subject requests (*see Procedure for Exercising Rights*).

Authorising Signature

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