



CERTIFICATE OF GDPR IMPLEMENTATION

INGECAL, S.L. certifies that at the date of signing this certificate the company **Inbenta Holdings Inc. Branch in Spain** has implemented a Management System for the Protection of Personal Data through which the implementation, review and improvement of the appropriate technical and organizational measures are established to guarantee the security of the processing of personal data in accordance with the provisions established by Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of these data (GDPR) and Spanish Organic Law 3/2018, of December 5 of Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD).

The processing of personal data carried out by this company are:

- Management of customers, prospects, and suppliers
- Staff and contractors management
- Software platform services provided to customers

Among other aspects, the Data Protection Management System includes:

- Policies, standards, and procedures for the Protection of Personal Data
- Record of processing activities
- Analysis of risks for the rights and freedoms of natural persons
- Implementation of technical and organizational measures appropriate to the identified risks.
- Contractual agreements with employees and contractors that state their responsibilities for information security and privacy information protection.
- Processor contractual agreements with all providers providing services involving the processing of personal data.
- Information clauses and request for consent, if applicable, in the data collection processes.
- Data processor agreement of the services provided to our customers.

And for the record for appropriate purposes, INGECAL, S.L. issues this certificate.

Digitally signed by: Evaristo Gutiérrez, Director of INGECAL, S.L.
In Sant Cugat del Vallès, September 9, 2021.