

## Essence of the joint controller agreement

Telefónica Tech, S.L.U., Telefónica Cybersecurity & Cloud Tech, S.L.U., and Telefónica IoT & Big Data Tech, S.A.U. (hereinafter and jointly, the Joint Controllers) generally act as joint controllers in relation to the processing of personal data carried out through the website <https://telefonicatech.com> and/or other pages that may be enabled for this purpose (hereinafter and jointly, **the Website**), as well as in the context of certain marketing and communication activities, the organization of events, and the sending of periodic bulletins or newsletters, given that these Joint Controllers jointly determine the purposes and means of the processing of personal data carried out in these areas under the Telefónica Tech brand.

In accordance with the provisions of Article 26 of 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 on the free movement of such data (**General Data Protection Regulation**), the Joint Controllers have signed the corresponding joint controller agreement in order to transparently determine their respective responsibilities in compliance with the obligations imposed by the aforementioned Regulation.

The functions derived from the joint controller regime have been assumed jointly by the Joint Controllers, without any individual allocation of responsibilities in relation to the processing operations covered by the agreement. Consequently, the Joint Controllers collaborate in a coordinated manner in complying with the obligations set out in the data protection regulations, ensuring transparency, operational consistency, and effective attention to the rights of data subjects. The essential aspects of the joint responsibility agreement are summarized below:

- **Common purposes:** the personal data of the data subjects are processed jointly by the Joint Controllers for purposes such as responding to queries submitted via forms or other contact channels, sending periodic bulletins, communications, or newsletters, maintaining and technically managing the Website (including cookie management), ensuring its security and user access to it, the maintenance, management, access, and security of the Cyber Security, Cloud, IoT, Big Data, Blockchain, and/or other platforms and/or services accessible through the Website for authorized users, the management of the relationship with users through social networks, the management of events, the sending of commercial or advertising communications about the Joint Controllers' products and services, and the improvement of B2B Customer satisfaction.
- **Obligations to provide information:** the Joint Controllers guarantee compliance with the duty to provide information set out in Articles 13 and 14 of the General Data Protection Regulation, providing data subjects with complete, clear, and accessible information about the processing carried out. This information is generally included in the common Privacy Policy, which is available at the following link: <https://telefonicatech.com/en/legal-privacy>; in the Cookie Policy applicable to the Website, accessible at <https://telefonicatech.com/en/cookies>; and in the specific Policies governing registration for events organized or sponsored by the Joint Controllers at any given time, among others. In this regard, and when necessary, we manage compliance with the principle of transparency in a unified manner through various notices, clauses, and/or privacy policies.
- **Exercising rights:** data subjects may exercise their rights (access, rectification, erasure, objection, restriction of processing, portability, not to be subject to automated individual decision-making, and to withdraw previously given consent) indistinctly before any of the Joint Controllers. A unified management channel has been set up for this purpose, which can be accessed via the following email address: [gdpr-comms.tech@telefonica.com](mailto:gdpr-comms.tech@telefonica.com).
- **Data Protection Officer (DPO):** the Joint Controllers have appointed a common Data Protection Officer, who is responsible for supervising compliance with data protection regulations and acting as a point of contact for both data subjects and the supervisory authority. Any queries, requests, or communications related to the processing of personal data may be addressed to the DPO via the following email address: [DPO\\_telefonicasa@telefonica.com](mailto:DPO_telefonicasa@telefonica.com)
- **Joint liability:** within the framework of the established joint controllership regime, the Joint Controllers assume joint and several liability to the data subjects and to the competent supervisory authority for the joint processing of personal data. This joint liability means that any of the Joint Controllers may be required to answer for all damages caused. This is, however, without prejudice to the right of recourse that exists between the Joint Controllers in the event that the breach is attributable exclusively to one of the Joint Controllers, in accordance with the provisions of the applicable data protection regulations.