

## **PRIVACY POLICY - LANDLORDS**

Cellnex values the privacy of its landlords. In this Privacy Policy, we describe who we are, what personal data we process and for what purposes (including the respective lawful basis), with whom we share it, how long we keep it, your rights and how to exercise them, as well as how you can contact us if you have any questions about these matters and/or want to pose other privacy queries.

### **1. Who are we?**

Your personal data will be processed by the Cellnex group company with which you have concluded and/or maintain a lease agreement or a similar agreement (the "**Agreement**"). This company acts as the Data Controller for your personal data under the General Data Protection Regulation (the "**GDPR**").

### **2. What personal data do we process?**

The personal data processed by Cellnex are those collected for the purposes of entering into the Agreement, as well as any others that may be necessary to ensure the purposes set out below. This data may include, among others, identification data (e.g. name and ID card number), contact data (e.g. address, telephone number and e-mail) and economic and financial data (e.g. rent amount, tax number and IBAN).

If the landlord is a condominium, the personal data of the condominium owners may also be processed (e.g. tax number, identification of the autonomous fraction, respective permillage and period of permanence of the condominium owner(s) in the fraction during the year, for example in order to comply with tax obligations, regarding for instance the submission of *Modelo 10*) by Cellnex. In these cases, Cellnex will act as an independent Data Controller (in relation to the condominium) with regard to such data, processing them for its own purposes and defining the respective means of processing.

Cellnex may also process personal data related with proceedings for enforcement, whenever the attachment (*penhora*) falls upon the rent amount established in the Agreement entered into and when notified for such purposes by the competent authorities.

### **3. For what purposes do we process your personal data (and the respective legal basis)?**

Cellnex will process your personal data in order to fulfil obligations, exercise rights and address any issues arising from the Agreement.

The lawful basis for this processing is the performance of the Agreement and, in certain cases, compliance with legal obligations, especially in tax matters or in attachment (*penhora*) proceedings related with rents, to which Cellnex is subject.

#### **4. With whom do we share your personal data?**

Whenever necessary to ensure the above purposes, your personal data may be shared with:

- Companies or entities within the Cellnex group, herein defined as the set of companies or entities owned directly or indirectly by Cellnex Telecom, S.A. – a company incorporated and operating under the laws of Spain, with registered office at Calle Juan Esplandiú, 11-13, 28007 Madrid, Spain, and Spanish VAT A-64907306 –, including Cellex Telecom, S.A.;
- Entities and public authorities, such as the Tax and Customs Authority;
- Service providers of Cellnex, namely for the purposes of providing services relating with the presentation of previously approved proposals by Cellnex within renegotiating proceedings of the Agreement and/or for the purposes of formalization of new contracts, providing accounting, administration and management services, as well as information and communication systems and technologies service providers;
- Condominium managers;
- Courts;
- Enforcement officers (*agentes de execução*);
- Lawyers and auditors, both internal and external, of Cellnex; and
- Other companies or entities that may be necessary and duly communicated.

In some of these cases, in addition to the lawful basis referred to in the previous number, the pursuance of a legitimate interest of Cellnex (for example contractual management) is also applicable.

If Cellnex intends to transfer your personal data to a third country or an international organisation (within the meaning of the GDPR) and there is no EU adequacy decision in place, the adequate safeguards provided for in Chapter V of the GDPR will be adopted.

#### **5. How long do we keep your personal data?**

Your personal data will be retained by Cellnex until all obligations arising from the Agreement have expired. However: (i) in cases of judicial, administrative or arbitration proceedings, the data will be retained for an additional period of 6 (six) months from the date of the final, unappealable decision in such proceedings; (ii) in cases of attachment (*penhora*) proceedings related with rents, the data will be retained for the duration of each proceeding; (iii) certain documents, particularly those related to tax matters, may be subject to legally imposed retention periods.

## 6. What are your rights and how can you exercise them?

At any time, you may ask us for:

- **Access** to your personal data processed by us;
- **Rectification** of your personal data, if they are inaccurate or incomplete;
- The **erasure** of your personal data, as better identified below;
- The **restriction** of the processing, in certain situations;
- The **portability** of your personal data, in certain situations;
- **Objection** to processing, in certain situations;

You may exercise these rights by sending an e-mail to [personaldata@cellnextelecom.com](mailto:personaldata@cellnextelecom.com).

We will handle your requests with great care to ensure the effectiveness of your rights. Proof of your identity may be required to safeguard the privacy of your personal data.

Please note that, in some cases, your request may not be immediately fulfilled. Regardless, we will promptly inform you, no later than one month after receiving your request, explaining the reasons for any delay.

You also have the right to file a complaint with the Portuguese Data Protection Authority.

### Right of access

The data subject has the right to obtain from Cellnex the confirmation of whether or not the personal data concerning him or her are being processed and, if so, to access his or her personal data and access the information provided by law.

### Right of rectification

The data subject has the right to obtain from Cellnex, without undue delay, the rectification of inaccurate or incomplete personal data concerning him or her.

### Right to personal data erasure («right to be forgotten»)

The data subject has the right to obtain the erasure of his or her personal data from Cellnex, without undue delay, and the latter has the obligation to erase the personal data, without undue delay, where one of the following reasons applies in particular:

- a) The personal data are no longer necessary for the purpose for which they were collected or processed;

- b) The data subject has withdrawn his or her consent for the processing of personal data (in cases where the processing is based on consent) and there is no other basis for the referred processing;
- c) The data subject objects to the processing and there are no overriding legitimate interests justifying the processing.

### **Right to restriction of processing**

The data subject has the right to obtain the restriction of processing from Cellnex if one of the following situations applies in particular:

- a) Contest the accuracy of the personal data, for a period that allows Cellnex to verify its accuracy;
- b) The processing of personal data is unlawful and the data subject opposes the erasure of the personal data and requests, in return, the restriction of its use;
- c) Cellnex no longer needs the personal data for the purposes of processing, but such data are required by the data subject for the purpose of declaration, exercise or defence of a right in a judicial proceeding;
- d) If he or she opposed the processing, until it is established that the legitimate interests of Cellnex take precedence over those of the data subject.

### **Right to personal data portability**

If the processing depends on the consent of the data subject and that consent has been provided by automated means, the data subject has the right to receive the personal data concerning him or her and which he or she has provided to Cellnex in a structured, commonly used and automatically readable format.

### **Right to object**

In cases where personal data processing is carried out for the purposes of the legitimate interests pursued by Cellnex or for other situations provided for in the GDPR, if applicable, the data subject may also, at any time, object to the processing of his or her personal data.

## **7. Do you have any questions?**

Should you remain with any questions regarding the processing of your personal data and/or wish to inquire about other privacy-related matters, you may send an e-mail to [personaldata@cellnextelecom.com](mailto:personaldata@cellnextelecom.com).

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