

PRIVACY NOTICE

1. Introduction

This Privacy Notice explains how we collect, use, store and protect personal data submitted as part of our Cellnex Community Fund (the “Grant”). We are committed to protecting your personal information and handling it responsibly, in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We ensure that your data is collected, used, stored, and shared only where we have a lawful basis to do so, and always in a way that is transparent, fair, and secure.

This notice applies to all organisations and individuals who submit information as part of the Grant application process.

2. Who we are (Data Controller)

Cellnex UK Limited is the data controller responsible for the personal data collected and processed through this programme.

Contact details:

Company Name and number:

Cellnex UK Limited (05153745)

Registered Address:

R+, 4th Floor, 2 Blagrove Street, Reading, United Kingdom, RG1 1AZ

Country Data Protection Officer

Email: UKlegal@cellnextelecom.co.uk

3. What Personal Data We Collect

We may collect the following categories of personal data when you apply for a Grant:

3.1 Applicant and Organisation Information

- Name and contact details of the applicant
- Organisation name, registration details, and contact information
- Information about the organisation’s activities, mission, and financial status
- Supporting documents submitted as part of the application

3.2 Financial Information

- Bank account details (collected at application stage for verification and due-diligence purposes)

3.3 Additional Information

- Any other information voluntarily provided in the application form or during assessment
- Correspondence between you and our team

We do not request or require special category data. If you choose to provide such information voluntarily, it will be processed only where strictly necessary and in accordance with the applicable laws.

4. How We Use Your Personal Data (Purposes of Processing)

We process your personal data for the following purposes:

- Assessing your eligibility for the Grant
- Verifying your organisation's identity and legitimacy
- Conducting due-diligence, anti-fraud, and risk-management checks
- Contacting you about your application
- Administering and managing the Grant programme
- Disbursing funds to successful applicants
- Maintaining audit trails and compliance records
- Evaluating the effectiveness of our ESG and CSR initiatives.

We may use applicant information to produce aggregated, anonymised statistics for monitoring and reporting on the impact of the Fund. These statistics do not identify any individual.

5. Lawful Basis for Processing

We rely on the following lawful bases under the UK GDPR:

5.1 Legitimate Interests

We process your personal data because we have a legitimate interest in administering the Grant programme, ensuring responsible allocation of funds, and verifying the eligibility of applicants. Applicants reasonably expect their data to be used for these purposes when they choose to apply.

5.2 Contract (Where Applicable)

If your application is successful, we may process your data where necessary to enter into or perform a Grant agreement with you.

6. Why We Collect Bank Details at the Application Stage



We request bank account information during the application stage because it is necessary to:

- verify the identity and legitimacy of the applicant organisation;
- complete due-diligence and financial verification as part of our governance requirements;
- prevent fraud and ensure funds can only be disbursed to verified accounts;
- streamline the assessment and award process;
- avoid delays in transferring funds to successful applicants.

Bank details are used solely for eligibility assessment and, if applicable, for disbursing Grant funds. They are not used for any unrelated purpose.

7. How We Share Your Personal Data

We may share your personal data with:

7.1 Internal Teams

Your personal data may be processed with internal teams who need access to perform their roles, including:

- ESG governance teams responsible for reviewing and approving applications
- Grant administration and finance teams involved in due diligence, contracting, and payment
- Internal audit, compliance, and risk teams for oversight and assurance
- IT and security teams who support and maintain our systems, including JIRA
- Access is limited to staff who require it to perform their duties.

7.2 Corporate Group

We may share your personal data with our parent company or other entities within our corporate group where this is necessary for:

- Centralised governance, reporting, or oversight
- Group level compliance, audit, or risk-management activities
- Administering or monitoring group-wide ESG programmes

Any group entity receiving your data is required to handle it in accordance with this Privacy Notice and the UK GDPR.

7.3 External Service Providers (Processors)

We use trusted third-party service providers to support our operations. These may include JIRA / Atlassian (Platform Provider). Your application data is processed within

JIRA, provided by Atlassian, which acts as a data processor on our behalf. All processors are contractually required to:

- Use your data only for the purposes we specify
- Implement appropriate technical and organisational measures
- Comply with our instructions and the UK GDPR

7.4 Regulatory, Legal, and Compliance Disclosures

We may share your personal data with:

- Regulators, government bodies, or law-enforcement agencies where disclosure is legally required
- Professional advisers, such as legal counsel, where necessary to establish, exercise, or defend legal claims. We only disclose what is strictly necessary.

We do not sell, rent, or trade your personal data.

8. International Transfers

If we transfer your personal data outside the UK, we will ensure appropriate safeguards are in place, such as adequacy decisions or standard contractual clauses.

9. Data Retention

We retain personal data only for as long as necessary for the purposes described in this notice.

- Unsuccessful applications: Bank details and financial information are securely deleted in accordance with our retention policy.
- Successful applications: Data is retained for the duration of the Grant and for a defined period thereafter to meet audit, reporting, and legal obligations.

Retention periods are documented in our internal data-retention schedule and policy.

10. Your Data Protection Rights

You have the following rights under the UK GDPR:

- Right of access
- Right to rectification
- Right to erasure (in certain circumstances)
- Right to restrict processing
- Right to object to processing based on legitimate interests
- Right to data portability

- Right to withdraw consent (where consent is used)

To exercise any of these rights, please contact us using the details above.

11. Automated Decision-Making

We do not use automated decision-making or profiling as part of the Grant assessment process.

12. How We Protect Your Data

We implement appropriate technical and organisational measures to safeguard your personal data, including:

- secure storage and encryption
- restricted access controls
- staff training
- audit and monitoring procedures

13. Updates to this Privacy Notice

We may update this notice from time to time. Any changes will be posted on our website with an updated revision date.

14. UK Supervisory Authority

The UK's supervisory authority is the Information Commissioner's Office (ICO).

ICO contact details:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

www.ico.org.uk

Last updated: 01/05/2026