



CERTIFICATE OF GDPR IMPLEMENTATION

CELER PAWLOWSKY, S.L.

INGECAL, S.L. hereby certifies that, on the signing date of this certificate, the company **CELER PAWLOWSKY, S.L. (CPSL)** has implemented a Personal Data Protection Management System, which regulates the implementation, revision and improvement of suitable technical and organizational measures for guaranteeing the security of personal data processing in accordance with the provisions set forth in Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), and in accordance with the provisions of Organic Law 3/2018, of 5 December, on Personal Data Protection and the Guarantee of Digital Rights (LOPDGDD).

Among other aspects, the Data Protection Management System contemplates the following:

- A Personal Data Protection manual and procedures.
- A Record of Processing Activities.
- A Risk Analysis.
- The implementation of technical and organizational measures that are appropriate for the identified risks and integrated with the controls contemplated in the Information Security Management System (ISMS) certified in accordance with ISO 27001.
- A commitment annex that includes confidentiality, information security and personal data protection measures, signed by employees and collaborators.
- Data processor agreements with all providers who provide services that involve personal data processing.
- Informative clauses and the request for consent, if applicable, in data collection processes.
- Contractual clauses as a data processor of the services provided to our clients.

And in witness whereof, INGECAL, S.L. issues this certificate.

Digitally signed by: Evaristo Gutiérrez, Director of INGECAL, S.L.
In Sant Cugat del Vallès, 4 July 2024