

 <p>WARREN A Sonepar Company</p>	COMPANY POLICY	
Title: Data Privacy Policy	Creation Date: 1 de septiembre del 2022	Revision Date:
Prepared By: Isabel Chevere Seda, HR Director <i>Isabel Chevere Seda</i> Reviewed By : Juan Feliciano , Internal Controls <i>Juan Feliciano</i> Approved By : Jorge Luis Gonzalez , SOACAM Legal <i>Jorge Luis Gonzalez</i>		

EFFECTIVE DATE : September 1, 2022

1. Policy Statement

Warren is committed to protecting the privacy and confidentiality of Personal Information about its employees, customers, business partners and other identifiable individuals. Warren's policies, guidelines and actions support this commitment to protecting Personal Information. Each employee bears a personal responsibility for complying with this Policy in the fulfillment of their responsibilities at Warren.

2. Scope

This Policy sets the minimum standard and shall guide all Warren employees and Agents even if local law is less restrictive. Supplemental policies and practices will be developed as needed to meet the local legal or departmental requirements. Supplemental policies and practices may provide for more strict or specific privacy and protection standards than are set forth in this Policy.

3. Policy Details

3.1 Warren respects the privacy of its employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment and recognizes the need for appropriate protection and management of Personal Information. Warren is guided by the following principles in Processing Personal Information:

- Notice
- Choice
- Accountability for onward transfer
- Security
- Data integrity and purpose limitation
- Access
- Recourse, Enforcement and Liability

3.2 Notice. When collecting Personal Information directly from individuals, Warren strives to provide clear and appropriate notice about the:

- Purposes for which it collects and uses their Personal Information,
- Types of third parties to which Warren may disclose that information, and

- Choices and means, if any, Warren offers individuals for limiting the use and disclosure of their Personal Information.

3.3 Choice. Generally, Warren offers individuals a choice regarding how we Process Personal Information, including the opportunity to choose to opt-out of further Processing or, in certain circumstances, to opt-in. However, explicit consent from individuals is not required, and will be deemed to have been given when Processing Personal Information for:

- Purposes consistent with the purpose for which it was originally collected or subsequently authorized by the individual, including, without limiting the generality of the foregoing, information submitted by and individual who is a customer and who intends to obtain economic and/or commercial advantages, apply for commercial offers, credit, discounts, and/or other commercial benefits that will not be available to the customer unless the information was provided,
- Purposes necessary to carry out a transaction relationship, such as, among others, a property's physical description, residential and phone numbers for delivery purposes; Personal Information necessary to obtain credit reports when the individual request credit facilities from Warren, etc.
- Personal Information necessary to qualify or pre-approve a customer when the individual requests credit facilities from Warren, including Personal Information from third parties that may become guarantors under any such credit facilities granted by Warren to the customer,
- Personal Information necessary to provide and/or complete guaranty documents for products or services sold by or obtained through Warren;
- Purposes necessary to comply with legal requirements, or
- Disclosure to an Agent necessary to perform any of the above-mentioned purposes.

3.4 Treatment of Personal Information related to Juristic and Legal Entities. All juristic or Legal Entities, whether customers, business partners, vendors, service partners or suppliers of Warren are deemed to have consented and willfully provided Warren any and all required Personal Information of such juristic and legal entity as well as Personal Information from any individual or individuals that will be engaged and/or form part of the business relationship between Warren and the juristic or legal entity or that will personally guaranty any obligation from such entities to Warren. Warren may request and store Personal Information from Juristic or Legal Entities such as tax identification numbers, physical and postal addresses, financial information, bank account numbers and other such information necessary to further and carry out the business between Warren and such Juristic or legal entity, including, without limiting the generality of the foregoing, sales of products and services, granting and/or extending credit facilities, obtaining personal guaranties for new or existing credit facilities, etc.

When a Juristic or Legal Entity provides individual or third party's Personal Information it represents and certifies to Warren that: (i) such entity has the necessary consents and authority to provide the individual's Personal Information, (ii) that the individual to whom that Personal Information belongs to has been informed by the entity that his information has been transmitted to Warren, (iii) that prior to the transmission to Warren of such Personal Information, the entity obtained the consent of said individual that the Personal Information be treated under all policies applicable to Juristic and Legal entities under this and any other applicable policies, (iv) that Warren is authorized to associate the individual's Personal Information with that of the entity that provided such information, and (v) that both the entity and the individual consent that such Personal Information be stored, kept, disclosed or distributed under the same rules applicable to the entity providing the Personal Information. All personal information that belongs to or is provided by a Juristic or Legal Entity to Warren shall be stored, maintained, or distributed in accordance with Warren's policies and shall be used for any and all legal purposes necessary and/or related to the business or commercial transactions between said Juristic or legal entities and Warren. Personal Information that belongs to, is property of, or has been provided by such Juristic or Legal entity to Warren will conclusively be deemed to have been willfully and legally provided in furtherance of the commercial business or transactions between Warren and said entities.

3.5 Accountability for Onward Transfer. In regard to the transfer of Personal Information to either an Agent or Controller, Warren strives to take reasonable and appropriate steps to:

- Transfer such Personal Information only for specified purposes and limit the Agent or Controller's use of that information for those specified purposes,
- Obligate the Agent or Controller to provide at least the same level of privacy protection as is required by this Policy,
- Help ensure that the Agent or Controller effectively Processes the Personal Information in a manner consistent with its obligations under this Policy,
- Require the Agent or Controller to notify Warren if the Agent or Controller determines it can no longer meet its obligation to provide the same level of protection as is required by this Policy, and
- Upon notice from the Agent or Controller, take further steps to help stop and remediate any unauthorized Processing.
- In the event of breach or loss of Personal Information provided by an Individual, Warren will notify both the Individual and the corresponding governmental agency as required by the Commonwealth of Puerto Rico Consumer Affairs Department Regulations, if and when such regulations apply.
- In the event of breach or loss of Personal Information provided by a Legal or Juristic Entity, Warren will notify only the person identified by said Legal or Juristic Entity to receive such notices. An Individual's Personal Information provided to Warren by a Legal or Juristic Entity shall not receive a separate notice from Warren, as such Personal Information will be associated with the Juristic or Legal Entity as provided under this Policy. It shall be the Juristic or Legal Entity's responsibility to inform any such individual that the Personal Information provided has been breached and/or compromised.

3.6 Security. Warren takes reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the Processing and the nature of the Personal Information.

3.7 Data Integrity and Purpose Limitation. Warren will only Process Personal Information in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. Warren shall take steps to help ensure that Personal Information is accurate, reliable, current and relevant to its intended use.

3.8 Access. Warren provides individuals with reasonable access to their Personal Information for purposes of correcting, amending or deleting that information where it is inaccurate or has been Processed in violation of the Warren data privacy principles.

3.9 Recourse, Enforcement and Liability. Violation of this Policy by an employee or contractor of Warren will result in appropriate discipline up to and including termination. Violation by an Agent, Controller or other third party of this Policy or Warren's privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

4. Purpose of Collecting and Use of Personal Information

Warren may from time-to-time Process certain Personal Information from or about employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment, including information recorded on various media as well as electronic data, for the purposes stated in this document, and any other purpose allowed by law related to said purposes or required in furtherance to achieve said purposes.

Warren will use that Personal Information to provide customers, business partners, vendors, service partners and suppliers with information and services and to help Warren personnel better understand the needs and interests of these customers, business partners, vendors, service partners and suppliers. Specifically, Warren uses information to help complete a transaction or order, to facilitate communication, to market and sell products and services, to deliver products/services, to bill for purchased products/services, and to provide ongoing service and support. Occasionally Warren personnel may use Personal Information to contact customers,

business partners, vendors, service partners and suppliers to complete surveys that are used for marketing and quality assurance purposes.

Warren may also share Personal Information with its business partners, vendors, service providers and suppliers to the extent needed to support the customers' business needs. Suppliers are required to keep confidential Personal Information received from Warren and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted. When the business relationship between Warren and its partners, vendors, service provider or suppliers is terminated for any reason, all Personal Information received shall be returned to Warren. If returning such information is not feasible or cost effective, the partner, vendor, service provider or supplier shall certify to Warren that all Personal information has been destroyed through secured and reliable means.

Warren also collects Human Resources Data in connection with administration of its Human Resources programs and functions and for the purpose of communicating with its employees. These programs and functions may include compensation and benefit programs, employee development planning and review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access to Warren facilities and computer networks, employee profiles, internal employee directories, Human Resource record keeping, and other employment related purposes. Warren also collects and uses Personal Information to consider candidates for employment opportunities within Warren. Human Resources Data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to Warren in connection with these Human Resources programs and functions. Warren will not share Human Resources Data with third parties for non-employment related purposes. Warren requires third parties receiving Personal Information to apply the same level of privacy protection as contained in this Policy and as required by applicable law.

Human Resources will not share data with other third parties , except in the following cases :

- If the Law requires it;
- If it is required for any legal proceedings:
- Emergency services: Share data with police, fire, and ambulance services in the event of an emergency or after certain incidents.
- To protect our legal rights and
- To buyers or potential buyers of the company in the event that we seek to sell the company.
- For insurance purposes when specific policies and/or endorsements require the disclosure of such information

Warren Human Resources Department will follow the following data protection and accountability principles:

- Only collect data that is needed
- Make sure the data collected is accurate
- Will not store personal data longer than needed for the specified purpose
- Process data in a way that ensures security, integrity and confidentiality.
- Will be able to demonstrate compliance.

Human Resources may collect photos by employees to verify their identities, Identification Cards, and employee profiles.

Warren does not sell or share employee personal data with third parties for marketing purposes .

5. Administration

5.1 Roles and Responsibilities. Responsibility for compliance with this Policy rests with the heads of the individual functions and departments together with any individual employees collecting, using or otherwise Processing Personal Information. Functions and department heads, in coordination with the Legal Department, are responsible for implementing further standards, guidelines and procedures that uphold this Policy, and for

assigning day-to-day responsibilities for privacy protection to specific personnel for enforcement and monitoring.

5.2 Implementation. This Policy is meant to be implemented in conjunction with supplementary data privacy policies specific to a region, country or department, if required. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities. Warren business units, functions or facilities will implement supplementary data privacy policies as required to be in compliance with applicable laws.

5.3 Interpretation. In the event of any conflict between this Policy and any supplemental data privacy policy, this Policy will supersede the supplemental data privacy policy to the extent that the supplemental data privacy policy is less restrictive. Corporate data privacy policies may provide for stricter data privacy and protection standards than are set forth in this Policy. In the event Corporate data privacy law provides for stricter data privacy and protection than this Policy, the Corporate data privacy law will supersede this Policy to the extent necessary to comply with stricter local law.

6 Definitions

"Agent" means any third party that collects and/or uses Personal Information provided by Warren to perform tasks on behalf of and under the instructions of Warren.

"Warren" is WDC of Puerto Rico. and all of its subsidiaries and affiliates globally.

"Controller" means a person or organization which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.

"Customer" a natural or moral person willing to acquire goods or services from or through Warren.

"Human Resource Data" means Personal information concerning Warren employees or prospective employees.

An "Identified" or "Identifiable" individual is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person's physical, physiological, mental, economic, cultural or social identity.

"Individual" means a single natural person

"Juristic or legal entity" refers to any moral person or entity created, organized and/or recognized by law, such as corporations, limited liability corporations, partnerships, anonymous partnerships, trusts, etc.

"Personal Information" when it refers to an individual is information or data about an "Identified" or "Identifiable" (see definition above) individual. Personal Information includes: name, last name, surname, date and place of birth, gender, marital status, physical and postal address, email, phone number, Social Security numbers, driver license numbers, electoral card numbers used for identification purposes, bank account numbers, user name, passwords, medical information protected under HIPAA, tax information, labor reviews, "Personal Information" does not include information that is anonymous, aggregated or in circumstances where the individual is not readily identifiable, or information which may already be in the public domain or easily obtainable by and/or available to the general public.

"Personal Information" when it refers to a "Juristic or Legal entity" shall be deemed to include Personal Information from the entity as well as Personal Information from individuals and/or third parties that may be associated with said entity, or that may be required in furtherance of the commercial transactions and/or business between Warren and said Juristic or Legal Entity.

“Policy” means this Global Data Privacy Policy, as revised.

“Processing” or “Process” means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

7. References

- Sonepar Code of Conduct
- Global Information Security Policy
- “Manejo, Retención, y Destrucción de Expedientes de Personal y Registros” (Spanish Policy May 2022)
- Other policies, procedures and standards on data privacy

8. Modifications

This privacy policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend the Privacy Policy we will update the Revision History.

9. Revision History

August 2022

10. Owner

Human Resources Department