

DATA PROCESSING CERTIFICATE

Certificate No.
C795770

Initial date:
09/12/2025

Valid:
08/12/2028

This is to certify that



ESPUBLICO SERVICIOS PARA LA ADMINISTRACIÓN S.A.

Calle Bari, 39, 50197, POLÍGONO PLAZA, ZARAGOZA.

is in compliance with relevant requirements specified by the Certification Scheme:

EUROPRIVACY™/®

Europrivacy™/® Certification Scheme General Specification Requirements v.77

Target of evaluation is in compliance for the following data processing:

Collection and processing of personal data through esPublico's digital platform "Gestiona" for the provision of services to public sector entities. This includes interactions through the electronic headquarters (sede electrónica), the management of user identification, access control, service requests, and the associated contractual and administrative workflows

EU Geographical scope: ES

Controller

Processor

Detailed information at <https://www.europrivacy.com/en/resource/registry>, with the following codes:



00A9:A057:A025:0011

www.europrivacy.com

Place and date:
Vimercate (MB), 9 December 2025



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For the Certification Body
DNV - Business Assurance
Via Energy Park, 14, - 20871 Vimercate (MB) - Italy



Zeno Beltrami
Management Representative

Appendix A to Certificate - LOCATIONS

Locations included in the Certifications are as follows:

Site Name	Site Address	Site Scope
ESPUBLICO SERVICIOS PARA LA ADMINISTRACIÓN S.A.	Calle Bari, 39, 50197, POLÍGONO PLAZA Zaragoza, Spain	Collection and processing of personal data through esPublico's digital platform "Gestiona" for the provision of services to public sector entities. This includes interactions through the electronic headquarters (sede electrónica), the management of user identification, access control, service requests, and the associated contractual and administrative workflows

Appendix B to Certificate - SUMMARY OF THE EVALUATION REPORT

Scope of this summary is to give transparency on the Data Processing covered by the Certification and the activities carried out to assess its conformity. The assessment has been performed by an Audit Team gathering adequate legal and technical expertise for the Target of Evaluation

a. Description of the Data Processing Activities (Target of Evaluation)

Applicant:	ESPUBLICO SERVICIOS PARA LA ADMINISTRACIÓN S.A.
Primary Formatted Address	Calle Bari, 39, 50197, POLÍGONO PLAZA, ZARAGOZA.
Certified object description (Primary Language)	Collection and processing of personal data through esPublico's digital platform "Gestiona" for the provision of services to public sector entities. This includes interactions through the electronic headquarters (sede electrónica), the management of user identification, access control, service requests, and the associated contractual and administrative workflows
EU Geographical scope: ES	<input type="checkbox"/> Controller <input checked="" type="checkbox"/> Processor

Certification scope:

Personal data is collected and processed through the Gestiona Platform, a SaaS (Software as a Service) solution designed to support government entities in managing administrative processes. The data processed includes citizen information and user (employee) data necessary for the entity's administrative activities. In certain cases, entities may include special categories of personal data when required for reasons of essential public interest, in accordance with GDPR Article 9.2(g).

The processing activities are governed by a clearly defined scope and purpose and include collection, registration, structuring, modification, custody and preservation, consultation, communication by transmission, interconnection, audio-visual recording, and all operations necessary to ensure proper service delivery. No automated decision-making is applied. Data is retained only for the duration necessary to fulfill contractual and legal obligations.

Access to personal data is strictly limited to authorized personnel within Grupo esPublico, which also manages software development and system operations internally. Data subjects are granted full transparency and the ability to exercise their rights in accordance with GDPR requirements.

This certified process serves as the official channel for all subsequent stages of administrative management. It is supported by robust physical and logical security measures, including secure infrastructure, encryption of data in transit and at rest, multi-factor authentication, continuous monitoring of access and activity logs, and compliance with recognized standards such as ISO/IEC 27001, (including application of the guidelines ISO/IEC 27017, ISO/IEC 27018), ISO/IEC 27701, ISO 22301, ISO 9001, and ENS.

Security controls are implemented in alignment with esPublico's internal security policies and reinforced by technical safeguards such as access governance, secure development practices, and network communication protocols. Compliance with these measures is periodically audited by esPublico's Regulatory Compliance Department and external certifying bodies. All personnel receive continuous training on information security and privacy obligations.

b. Criteria for Certification

To evaluate the Data Processing Activities the following version of the scheme has been utilized, within the limits of the agreed Target of Evaluation and Normative Scope:

Europrivacy™/® Certification Scheme General Specification Requirements v.77

Criteria Version: v.60

c. Applied Means of Evaluation

To provide an efficient and reliable verification, the following means of evaluation has been utilized:

<input checked="" type="checkbox"/> Documentation review	<i>Refers to the review done by the Auditor of documentation, files, and records that are relevant to assess the compliance of the Target of Evaluation with Criteria, Checks and Controls required by the Scheme</i>
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- Interviews *Interviews consist in meeting relevant stakeholders to ask questions and request clarifications. The interviews have been performed through:*
 face-to-face meetings online and remote meetings phone calls written questions
- Examinations *Examinations refer to the visit or remote assessment of premises where data processing is performed or managed, and to the direct observation of objects or systems relevant for the Target of evaluation, in order to verify and determine if requirements specified in Criteria are met. They include visual observations and questions asked to stakeholders involved in the data processing.*
- Data/records sample analysis *Refers to the process of examining a subset of data or records to draw conclusions about the entire dataset.*
- Tests *Tests refer to the performance of a data processing or a procedure in order to verify and determine if requirements specified in Criteria are effectively met. Tests were performed,*
 in situ remotely in a laboratory

d. Results

The collection and processing of personal data via esPublico's digital platform "Gestiona," in relation to service provision for public sector entities, has been determined to meet all relevant scheme requirements for data processors. ESPUBLICO SERVICIOS PARA LA ADMINISTRACIÓN S.A. upholds high standards of personal data protection, complying with GDPR and applicable national legislation. Data obtained through these digital platforms is managed within a well-defined scope, protected by comprehensive physical and logical security controls, and governed by transparent policies that ensure the rights of data subjects are respected.

e. Reasons for granting the certification

The Applicant's Data Processing Activities included into the Target of Evaluation, and referred to the applicable parts of the scheme (as processor), has been found compliant with requirements specified by the Certification Scheme and relevant for the Data Processing role. The evaluation process did not find any substantial non-conformities and the decision to certify is consistent with the collected evidences.

f. Terms and Conditions

The use and communication of this certificate is subject to DNV and Europrivacy^{TM/®} terms and conditions.