



Data Governance Policy

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1. INTRODUCTION

ENAIRe, a state-owned company of the Ministry of Transport, Mobility and the Urban Agenda, is responsible for the planning, management, coordination, operation, maintenance and administration of air traffic, telecommunications and aeronautical information services, as well as of the communications infrastructure, facilities and networks of the air navigation system, with the aim of ensuring that the service is provided safely, efficiently, continuously and sustainably.

As part of its work, ENAIRe regards the data generated as a strategic asset of the organisation. As such, it is a resource that can provide direct benefits or help ensure the economic performance for the company. Therefore, Management has decided that it must invest in data, make decisions on its maintenance, manage it throughout its life cycle, and identify and control the risks that may be associated with it, all in accordance with the applicable regulations and guidelines. This maintenance, management, control and measurement must be specified in policies, standards or procedures.

Managing ENAIRe's data with a comprehensive approach helps to increase the efficiency of our processes and promotes the growth of our business. It also increases the level of user satisfaction, since the use of quality information increases the reliability, security and speed of decision-making.

This Policy is without prejudice to the general principles that must govern the processing of personal data, contained in ENAIRe's Data Protection Policy, in accordance with Community Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 concerning the protection of individuals regarding the processing of personal data and the free movement of this data - the General Data Protection Regulation (GDPR).

2. PURPOSE AND SCOPE

The purpose of the Data Governance Policy, hereinafter the "Policy", is to establish ENAIRe's operational principles and commitments in the area of data governance, in keeping with the applicable rules and regulations. It considers the main lines of action aimed at maximising the value of data and facilitating decision-making based on the analysis and information it provides, as well as preserving its quality, security and ethical use. This Policy is without prejudice to the provisions of the Personal Data Protection Policy.

This Policy is provided as a guide and is applicable to, and the responsibility of, all ENAIRe professionals who are involved in the use and protection of information owned by ENAIRe and the systems that support it. It will also be accessible, disseminated and known to all of them.

This Policy seeks to contribute to and facilitate ENAIRe's cultural transformation and bolster commitments to the good governance, excellence, innovation and sustainability of the Organisation by responsibly developing the full potential of data.

This Policy applies to all ENAIRe personnel, the members of its Management Committee and Governing Council, who are required to know, understand and comply with the provisions of this Policy.

Similarly, persons acting on behalf of and representing ENAIRe, even if they are not part of its organisation, will undertake to act in accordance with this Policy when representing the Company or acting on its behalf in the performance of their duties, and they agree to extend these principles to the value chain.

3. OPERATING PRINCIPLES AND COMMITMENTS

This Policy includes the following ENAIRe commitments:

- Place data at the centre of strategic and operational decisions to maximise its value.

- Define and develop the measures needed to make it easier to access data from the different units while preserving its security, quality, consistency and privacy, as well as ensuring its ethical and appropriate use in accordance with any applicable standard.
- Implement the Data Governance function, with the aim of facilitating the management of data assets.
- Promote a culture of data.

To this end, three different areas of activity will be undertaken involving: the organisation ("who"), the processes ("how") and the tools ("with what"). These include the following:

- Establish a global, formal and uniform approach to data management in the organisation that maximises the value of information.
- Align the objectives of how data is managed and used with the needs and challenges of the business.
- Define the roles, responsibilities and relationship model required in the area of Data Governance.
- Design the processes and procedures that define and guarantee the proper implementation and use of data.
- Identify existing data and domains in the different units.
- Implement the measures needed to provide a catalogue of data assets that facilitate their search and management.
- Promote access to data by adopting and deploying means that facilitate the sharing and reuse of information in accordance with the needs of each unit.
- Implement controls to preserve the appropriate levels of security, privacy and ethical use that are consistent with existing regulations and policies.
- Define and develop the aspects needed to comply with quality requirements specific to data, depending on their nature or purpose.
- Implement communication and training actions that encourage a culture of data management.
- Promote continuous improvement by reviewing and updating the management model and the various actions in order to adapt it to the changing context and best practices in force at any given time.

Data Governance committees and decision-making bodies may be established, at both the operational and strategic level, to monitor and control the execution of the governance and use of data.

A Data Office has also been created at ENAIRe, which is leading the preparation and gradual execution of tasks related to data governance, in collaboration with various units.

4. MONITORING MECHANISMS

The body responsible for supervising the operation of and compliance with this policy is the regulatory compliance body. Until this organisation is created, the current internal or external regulations will apply.

The "Digital Transformation Steering Committee" will oversee the promotion and implementation of this Policy, and report on its progress to the regulatory compliance body when appropriate, in accordance with the processes established for its review.

In addition, given the relevance of data governance issues, specific duties may be assigned to other specialised committees if necessary.

5. DISCLOSURE AND DISSEMINATION

In compliance with the requirements of international transparency standards and practices, this Policy will be made available to all stakeholders on ENAIRE's website for their information and consultation.

Similarly, the Policy will be appropriately communicated and disseminated internally using existing tools, to help everyone acting on behalf of ENAIRE to understand and apply it.

6. APPROVAL AND VALIDITY

Following its presentation to the Management Committee on 19 April 2023, this Policy was approved by ENAIRE's Governing Board at its meeting of 26 April 2023, coming into force on that date. It shall remain in force until amendments are made to the Policy, which will be properly communicated.

This Policy is subject to review and updating as needed to adapt it to any regulatory, social, economic or organisational changes.