# INFORMATION RELATING TO THE PROCESSING OF THE PERSONAL DATA OF BENEFICIARIES OF OUR EMPLOYEES' INSURANCE

ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A. (ACS), with registered office in Avda. Pío XII, 102, 28036, Madrid (Madrid) -Spain-, tax identification number A28004885 and telephone 913439369, makes available this information concerning the processing of your personal data:

### 1.- Is it mandatory for you to provide us with your personal data?

It is mandatory for you to provide us with the data that, as described below, are necessary to perform a contract that we enter into with you or to comply legal obligations. In these cases, if the data are not provided, it will not be possible to execute and/or honour, totally or partially, all or part of our commitments.

## 2.- For what purposes do we process your personal data and for how long?

ACS processes your data for the following purposes, under no circumstances making any exclusively automated decisions that may affect you in any way or for are any purposes other than those for which we use your data:

- a) Life, health, life or accident insurance management, travel and pension plans of our employees, being authorised to do so by the legitimate interest of the insured employee in naming the beneficiaries of the aforementioned insurance and, by virtue of their consent if they wish us to carry out the insurance procedures, as well as to execute the corresponding insurance agreement. For these purposes, we will keep your information for up to 5 years after the termination of the insurance.
- b) Exceptionally, to defend the company's interests and legal advice, and being authorised to do so by virtue of our legitimate interest in defending the rights and interests of ACS and as necessary to file, bring or defend claims. We will retain the data necessary for this purpose while the claims or in- or out-of-court proceedings in which ACS is an interested party are ongoing.

#### 3.- Types of data we process and how we obtain them

For the purposes described above, we may process the following types of data: Identification of personal characteristics (such as your marital status), relating to insurance and on transactions (such as indemnities).

The data processed are provided to us by you or your legal representative, as well as by third parties (employees, insurance companies and, where applicable, courts of law or other dispute resolution bodies).

#### 4.- Who will we share you data with?

We may share your personal data with the following individuals or legal entities:

- Insurance companies.
- Notaries and Registrars.
- Only if necessary to defend the company's interests and internal legal advice, with courts and other conflict resolution bodies, state forces and security bodies and the following ACS providers to provide us with their respective services:

- o Consultancy and legal firms to defend the Group's legal interests and rights.
- o Court representatives

ACS applies strict controls in the selection and contracting of its suppliers, to ensure that they can only access your personal data for the sole purpose of providing us with the contracted service, following our instructions, applying strict protection measures and without them being able to use them for any other purpose or, in general, share them with third parties.

Unless legally required, we will not share your personal data with any other individual or legal entity.

#### 5.- International data transfers

we do not envisage any international transfer of their data (which occurs if their data are transferred to or accessed from outside the EEA) as a result of the data processing described above. However, if the international transfer of you data is necessary, we will implement the appropriate mechanisms to ensure that the processing of your data outside the EEA will take place with the same level of protection as required in Europe.

## 6.- What are your rights in relation to the processing of your data?

You are entitled to receive information relating to the processing, accessing, rectifying and, where appropriate, erasing your data, as well as, in certain circumstances, to restrict their processing, to oppose certain processing, to revoke your consent, and to the portability of your data under certain circumstances.

You may exercise your right of objection with regard to the purposes that, as described above, are based on the satisfaction of a legitimate or public interest. This right may be denied if, in view of the request made, there are compelling legitimate grounds prevail for the processing or if your data are necessary to file, bring or defend claims.

You can exercise these rights by writing to ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A. at Avda. Pío XII, 102, 28036 Madrid (Madrid), Spain or via email at pdd@grupoacs.com.

Likewise, we inform you that you are entitled to file a claim with the competent control authority (in Spain, the Spanish Data Protection Agency or any agency that many replace it in the future), if you consider that any type of infringement has occurred in relation to the processing of your personal data.

#### 7.- Contact our Data Protection Officer

To obtain additional information, or for any other matter relating to the processing of your data, please contact our Data Protection Officer at:

Address: Avda. Pío XII, 102, 28036 Madrid (Madrid), Spain

Email: pdd@grupoacs.com