

INFORMATION RELATING TO THE PROCESSING OF THE PERSONAL DATA OF SHAREHOLDERS AND INVESTORS

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 all or part of the contractual or legal commitments with regard to you.

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) Management of the relationship with our shareholders and investors, to be able to know the shareholder base, to carry out Secretarial duties, to carry out the electoral process, to keep the register of members, among others, as required to comply with the legal obligations of listed companies, as well as to make possible the rights and obligations under our contractual relationship with you. We will retain your personal information for as long as you are an ACCS Shareholder and, subsequently, for as long as any type of liability (by judicial or administrative channels) may be claimed by either party.

b) Tax management, as required to ensure the correct performance of the fiscal and tax obligations of ACS and corporate companies. For these purposes, we will keep your information for ten (10) years from the latest tax accrual, unless inspections are started, in which case they will be stored until they are definitively closed.

c) Internal audit, to examine, evaluate and supervise the Internal Control and Risk Management systems, as required to comply with legal obligations. For these purposes, we will keep your information for five (5) years after each audit report, unless it is necessary for a longer time due to the opening of investigations or claims, in which case they will be kept until these are definitively closed.

d) Exceptionally, internal control, legal advice and regulatory compliance, if necessary to defend the interests and rights of the company and/or to avoid any type of criminal liability or conduct contrary to the external or internal regulations of the company, as there is a legitimate interest in it, as well as a public interest in the control and prevention of offences and as required to comply with legal obligations (of listed companies, compliance with criminal law, data protection, etc.). Your information will be stored as long as it is necessary for the internal investigation or advisory services and subsequently, duly blocked, for the legal period envisaged in each case to file and defend possible claims and, where appropriate, until their final closure.

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, personal characteristics, work, commercial information (such as activities and business or commercial licenses), economic, financial and insurance and other types of data (such as shareholder reference number, securities accounts or classification code, as well as the details of any power of attorney). We may also very rarely process other type of information that is relevant in a potential incident, investigation or claim (including, albeit exceptionally, data relating to criminal convictions and infringements).

The data processed can be provided to us by you or your legal representative, as well as by third parties (group companies, suppliers, employees, group companies, IBERCLEAR, Bloomberg and other individuals or legal entities related to ACS).

4.- Who will we share you data with?

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

- Public authorities or bodies (Tax Authorities, Courts or other possible dispute resolution bodies, Notaries and Registries or Public Registries, foreign Public Authorities and others).
- State Security Forces and Bodies.
- Factiva Limited, for due supervision of regulatory criminal compliance.

In addition, the following ACS providers may need to access some of your personal data to provide us with the service we have contracted:

- Workiva Netherlands B.V., to generate reports that we must send to the Spanish National Stock Market Commission (CNMV).
- COMPUTER SHARE INVESTOR SERVICES PLC.
- Consultancy and legal advisory firms.
- 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

As a result of the data and/or order communications referred to above, your personal data may be transferred to:

- Workiva Netherlands B.V., with regard to its parent and certain subprocessors located in the US. The standard Contractual Clauses approved by the European Commission apply to these transfers, which, following the relevant evaluations, have been considered to provide an adequate level of protection for your rights at the place of destination.

- Factiva Limited, located in the United Kingdom, a territory declared by the European Commission to be a secure destination when transferring personal data.

You can obtain more information on the guarantees applied to these international data transfers by contacting our Data Protection Officer (see point 7).

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, information relating to restricting and objecting to their processing, 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 may 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