

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA OF COMPLAINANTS (users of our ethical channel)

ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A. (ACS), located at Avda. de Pío XII, 102, 28036, Madrid -Spain-, TAX ID (NIF) number A28004885 and telephone 913439200, provides the following information concerning the processing of your personal data:

1.- Why do we process your personal data?

ACS processes your data for the proper **management of the Ethical Channel, coordination of the compliance systems, internal legal counsel and defense of our rights and interests**, for the detection of crime and prevention of the imposition of criminal liability upon ACS, as well as to avoid any type of conduct contrary to the internal or external regulations of the company. This is justified based on the legitimate interests of ACS in the prevention of these behaviors and in seeking to defend the rights and interests of ACS, as well as for that which is necessary for compliance with the respective legal obligations and, as the case may be, for the formulation, exercise or defense of claims.

Under no circumstance will we carry out exclusively automated decisions that may affect you in any way nor are there ulterior motives, for which your data is used.

We will retain your information for a maximum period of three months after the filing of this complaint if the facts have not been proven and as long as it is not necessary for other purposes or for probative purposes of the proper controls and supervision in the prevention of crimes. In the event that the facts are proven or sufficient evidence is established, the data will be retained as necessary for the company to exercise its rights in court.

2.- Types of information we process and how we obtain it

For the purposes described, we may process the following types of information: Identifying, regarding employment if you are our employee, regarding commercial information (such as business activities and deals), on transactions (such as Assets received, Assets supplied, Compensations / Indemnification and Financial transactions) and any other personal information that you provide us with when making your report through our Ethical Channel.

The data processed is provided to us by you or your legal representative, as well as by third parties: group companies, employees and other individuals or legal entities related to ACS.

3.- With whom do we share your data?

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

- Courts and tribunals, as well as other possible dispute resolution bodies.
- National law enforcement and security forces.
- Notaries and registrars.

The following ACS suppliers may need access to some of your personal data in order for them to provide the service that we have contracted:

- Microsoft, for Office 365.
- Consulting and legal counsel firms for the defense of the legal interests and rights of the Group.
- Attorneys-in-fact for legal representation in legal proceedings.

Unless obligated by law, we will not communicate your personal data to any other individual or legal entity.

4.- International transfers of data

As a result of the data communications and/or the orders referred to in the previous sections, your personal data may be transferred to:

- To Microsoft, in the United States, in accordance with the EU-US Privacy Shield Adequacy Decision. You can obtain more information at <https://www.privacyshield.gov/welcome>.

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

You have the right to receive information about the processing of your data, to access the respective information, to correct it and, where appropriate, to have it deleted, as well as, in certain circumstances to limit the processing thereof, to oppose certain types of processing and to the portability of your data under certain circumstances.

To exercise any of these rights, you can contact ACS, ACTIVIDADES DE CONSTRUCCIÓN Y SERVICIOS, S.A. at the mailing address Avda. de Pío XII, 102, 28036 Madrid, Spain or via the email pdd@grupoacs.com.

Likewise, we inform you that you have the right to file a claim with the competent enforcement authority (the Spanish Data Protection Agency or the body that replaces it in the future), if you consider that there has been any type of violation in relation to the processing of your personal data.

6.- How to contact our Data Protection Delegate

For additional information, or for any other question regarding the processing of your data, please contact our Data Protection Delegate at:

Address: Avda. de Pío XII, 102, 28036, Madrid, Spain.
Email: pdd@grupoacs.com