

## INFORMATION RELATING TO THE PROCESSING OF THE PERSONAL DATA OF WHISTLEBLOWERS (users of our whistleblower channel)

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 not mandatory for those people who wish to use our whistleblower channel to provide us with their personal data. They may issue their complaint in a fully anonymous manner if they so wish. In any case, if you provide us with your personal data, whether in the initial complaint or subsequently, all information will be treated with total confidentiality and strict security controls.

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

ACS processes your data for the appropriate **ethics channel management, coordination of compliance systems and internal legal advice and defence of our rights and interests**, to detect offences and prevent the imposition of criminal liability on ACS, as well as to avoid any type of conduct contrary to the company's internal or external regulations. We are entitled to this based on the existence of a public interest in the internal whistleblower systems, on ACS's legitimate interest in preventing these practices and in seeking to defend ACS's rights and interests, as well as on the need to comply with a legal obligation and, where appropriate, to file, exercise or defend claims.

In no case do we carry out exclusively automated decisions that may affect you in any way, nor are there any purposes other than those for which we use your data.

We will retain your personal information until the end of the investigations if the facts have not been proven provided that they are not necessary for other purposes or for evidential purposes of due control and supervision in the prevention of offences. If the events are proven, the data will be retained for as long as necessary for the company to exercise its rights in trial. However, if you process your complaint through our Ethics Channel, your data will only be stored in that channel for 3 months, in accordance with the applicable regulations.

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

Your data will be processed with maximum confidentiality, and only if the alleged act gives rise to administrative or judicial proceedings may the data provided may be communicated to the competent authorities for investigation and sanction (courts or other dispute resolution bodies, State Security Forces and Bodies or Public Prosecutors), as well as to the relevant persons involved in the subsequent investigation.

The data may also be communicated, together with the complaint filed, to a division or subsidiary of the ACS Group if the alleged facts affect it and/or should be investigated by it.

The following providers of ACS may also need to access some of your personal data that we use to provide their services:

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

- NAVEX GLOBAL UK Limited, as the provider of our Ethics Channel.

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.

#### 4.- International data transfers

In relation to the stated purpose, their data will not be processed or accessible from outside the EEA (EEA), with the following exceptions:

The provider of our Ethics Channel, NAVEX Global UK Limited, located in the United Kingdom, a country that has been recognized to have an adequate level of protection in accordance with the Adequacy Decision taken by the European Commission for the United Kingdom as the country of destination of the data, which can be viewed at:

[https://ec.europa.eu/info/sites/default/files/decision\\_on\\_the\\_adequate\\_protection\\_of\\_personal\\_data\\_by\\_the\\_united\\_kingdom\\_-\\_general\\_data\\_protection\\_regulation\\_en.pdf](https://ec.europa.eu/info/sites/default/files/decision_on_the_adequate_protection_of_personal_data_by_the_united_kingdom_-_general_data_protection_regulation_en.pdf)

If we must transfer the report to one of our divisions or subsidiaries and it is outside EEA territory, the transfer of your data is authorized in this case as necessary for reasons of public interest and/or to file, bring or defend claims.

#### 5.- 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](mailto:pdd@grupoacs.com).

Likewise, we inform you that you are entitled to file a claim with the competent control authority (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.

#### 6.- 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](mailto:pdd@grupoacs.com)