

## GLOBAL PRIVACY POLICY

The security of personal data has become one of the top priorities for organisations, and in a global and highly interconnected company such as ours, ensuring the inviolability of this information must be a priority objective. In this sense, we wish to be transparent and make this Privacy Policy available to everyone who interacts with us.

This Policy has a global character since, although whenever we collect your data, we shall provide you with specific information on the processing, we should like to draw up and make available to you the present document, where you can find and consult the **general and relevant information on our practices with regard to the Protection of Personal Data**, as well as our relations with those third parties who may access or collect such data on our behalf.

This Policy applies to Acciona, SA and all Acciona Group companies, defined as those over which Acciona, SA exercises, directly or indirectly, control over their capital and/or management; you can check out the individual companies that make up this Group at any time at <https://www.acciona.com/es/accionistas-inversores/informacion-financiera/cuentas-anuales/> (collectively referred to as "**ACCIONA**"). The references in this Privacy Policy to "ACCIONA", "we", "us" and "our" concern the Data Controller in charge of processing your personal information, which, in general, will be the entity that collects, processes and at any time identifies this information.

One of ACCIONA's principles is to respect the regulations of each of the countries in which it operates, adapting its information systems to the specific regulations for processing the data of anyone who, for whatever reason, has dealings with us. ACCIONA undertakes to process personal data in accordance with personal data protection regulations and more specifically, whenever applicable, with the provisions of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in conformity with and with respect for the applicable local legislation in each case, meaning that in some jurisdictions this Policy could be supplemented by the corresponding local regulations.

This Privacy Policy is applicable to all Users, these being understood to be visitors to the website, as well as any other person who provides us with personal information through the various channels (hereinafter, "**User**" or "**Users**"). In this context, **Channels** are the various means or services that we make available to you to permit you to interact with us, whether or not they involve registration, such as websites, applications, platforms, mailboxes, addresses or telephone numbers for the provision of information or assistance to Users, profiles on social networks, forms, events, etc.

Some of our Online Channels may contain links to other non-ACCIONA third party websites and applications. This Privacy Policy does not apply to these. Please also review the privacy policies of such third parties to familiarise yourself with their practices. They may also contain cookies from third parties that are not owned or controlled by ACCIONA. In this case you can choose your third party cookie settings by using our Cookie Settings Tool, where you can manage your preferences, which you can access by clicking on "Cookies".

ACCIONA adopts the **technical and organisational measures** necessary to guarantee the security of personal data and to prevent the alteration, loss or unauthorised processing of or access to such data, taking into account the state of the art, the nature of the data and the risks to which



the data are exposed. You may also confirm the presence of the SSL certificate by checking the Website's properties in your browser. A connection will be secure when "https://" appears in the browser's address bar instead of "http://" and a padlock symbol is displayed. You can look up more features of the SSL certificate in the Legal Notice section.

### Who is the Data Controller in charge of processing the personal data?

Whenever personal data are collected and processed, we shall inform the User of the ACCIONA company who is the Data Controller in charge of processing, and we shall provide the corresponding identifying data.

With regard to this Privacy Policy and this website, we would inform you that the Data Controller in charge of processing is:

**Company name:** Acciona, S.A.

**Tax ID:** A08001851.

**Address:** Avenida de Europa, número 18, Parque Empresarial La Moraleja, 28108 de Alcobendas (Madrid).

**Telephone:** +34 91 663 28 50

**Contact e-mail address:** [accionacorp@acciona.com](mailto:accionacorp@acciona.com)

The Data Protection Officer is a point of contact between you and the Data Controller; for any questions relating to the processing of personal data, if you wish, you may contact him at [protecciondedatos@acciona.com](mailto:protecciondedatos@acciona.com).

### What personal data may we collect through our Channels?

For the purposes of this Privacy Policy, "personal data" are data that identify a person or can be used to identify them.

ACCIONA hereby informs its Users that their personal data, obtained through the Channels owned by ACCIONA, may only be collected for processing when they are **adequate, relevant and not excessive** in relation to the specific, explicit and legitimate scope and purposes for which they were obtained.

Whenever personal data are collected through our Channels for specific purposes, **Users will be provided beforehand with clear and unequivocal information** on i) the Data Controller and its contact details, iii) the specific purposes of the processing and the basis for the legitimacy thereof, iv) the recipients or categories of recipients, where applicable, as well as the existence or not of international transfers, v) the storage criteria or periods, vi) and the rights enjoyed by Users in their capacity as data subjects.

Users are also solely responsible for the information provided, and for the veracity and legality of the same.

- **Information from third parties**

Whenever Users provide us with data concerning third parties, either voluntarily or because we require such data to comply with any legal obligation, Users consent to the processing and declare that the data are accurate. Likewise, Users declare that they have informed the third parties of the content of the present policy and/or of the policy that applies to them and of which they have been specifically informed, and of the corresponding rights relating to the



Protection of Personal Data that are enjoyed by them. Notwithstanding the foregoing, ACCIONA will use its best efforts to act appropriately in relation to the processing of [the data of] such third parties.

- **Public information**

ACCIONA may process information to which it may have access as information that is lawfully accessible to the public, and in particular, public information that is available in official registers. This processing will in any event only be done if there is a legitimate basis as set out in the applicable regulations and, whenever possible or where there is a contractual relationship, you will be informed.

- **Personal data of minors**

ACCIONA does not knowingly collect personal data from minors without the consent of their parents, guardians or legal representatives. None of the Channels made available to Users by ACCIONA are designed for or directed at minors.

If parents, guardians or legal representatives believe that their minor children have provided personal information without their consent, please contact us by e-mail at [protecciondedatos@acciona.com](mailto:protecciondedatos@acciona.com).

### **For what purpose and legitimate reasons does ACCIONA process personal data?**

ACCIONA processes the personal data of Users, collected through any of our Channels, for the purposes and on the legitimate bases as set out in detail and notified for each specific processing operation; however for your information only, we have set out some of these, which are more general in scope, below:

- **To manage the relationship established with us**

- For those services that we provide through APPs or online platforms, we process the data provided by Users in order to manage access credentials, provide assistance, answer queries, distribute our products and services, and manage the quality of the same. In other words, out of all the categories of data that may have been collected, we will only process those that allow us to be more efficient.
- In this sense, we will also process the data provided to respond to requests for services and requests for information from our Users received through any of our Channels, and to be able to deal with any suggestions, claims or complaints, where applicable.

In such cases, we shall collect your data to enable us to implement the pre-contractual or contractual relationship that will allow us to provide you in an efficient manner with our products and services.

- We shall also process your data whenever you subscribe to any of our channels, newsletters or news bulletins alerting you to our products and/or services, or ask us to send you commercial communications, and the data you provide us with through the cookies collected when browsing online.

Users' informed and specific consent will form the legal basis for this part of the processing.

- **To manage applications and participation in our selection processes**

Any interested party can apply for job vacancies, scholarships and/or specific programmes through our Employment Channel. The data and documentation received are in this case



processed to evaluate applications and, should you give us your consent, to consider you for other possible ACCIONA vacancies, which may involve sharing the data with the Group company responsible for the vacancy in question.

The legal basis for the processing is the implementation of pre-contractual measures, and the consent given if you wish to opt in to other possible vacancies.

Full information on this processing is available at the following link: [politica-privacidad-candidatos-en.pdf \(accionacorp-back-pro-new.azurewebsites.net\)](#)

- **To manage contact details within the scope of contractual or commercial relationships**

We process contact details of potential customers, legal representatives of legal entities and organisations, whether public or private, analysts and investors or other concerned parties who provide us with their details, this in order to send them information of interest, to manage the commercial relationship that binds us and to be able to manage invitations or communications about events organised or sponsored by ACCIONA or in which ACCIONA participates.

The basis for the legitimacy of such purposes is maintaining the pre-contractual, contractual and/or commercial relationship that binds us.

- **Compliance with the legal obligations incumbent upon us**

Whether these legal obligations are of a commercial, fiscal, accounting or administrative nature, the legal basis authorising us to carry out this processing is compliance with legal obligations.

- **Fraud management**

For some of the services that we provide, it is necessary to check on people's identity in order to offer protection, detect and prevent fraud or other unlawful activities, unauthorised transactions, claims and other types of liabilities, and to manage quality and business-associated risks, and to investigate, where necessary, illegal activities and potential breaches of our policies and/or the terms and conditions of our services.

The legal basis is compliance with the legal obligations that apply in each case. Inter alia, and by way of an example, Law 10/2010 of 28 April on the Prevention of Money Laundering and the Financing of Terrorism.

- **Data obtained as the result of the provision of the service or product.**

ACCIONA may process data obtained through Users and data obtained as the result of the provision of the contracted service or product to adapt and improve our business activity and to make a very basic analysis of its use, but always within reasonable expectations based on the relationship that you as a User of ACCIONA have with us. The specifics of the data processed will be identified in the data protection clauses for each product or service.

The legitimate basis for the processing is ACCIONA's legitimate interest in analysing or predicting in a very basic way aspects of its products and services in order to improve the administration and provision of those products and services. The right to object to such processing may be exercised in accordance with the provisions of the section on the rights of data subjects contained in every Privacy Policy.

- **Security and surveillance of facilities**

Our facilities are equipped with cameras and video surveillance systems, with the aim of safeguarding the security of goods and people.



The legitimate basis for the processing is ACCIONA's legitimate interest in ensuring the security of its facilities.

- **Visitor and third party management**

In order to control the access of visitors, collaborators or other third parties to facilities, it is possible that, at some of our facilities, identification data may be collected.

The legitimate basis is in this case consent, as well as ACCIONA's legitimate interest in ensuring the security of goods and people at its facilities.

In the event of exceptional situations such as COVID-19 pandemic, if it was necessary to establish complementary access control measures, these measures will be informed in detail, at the entrances to each of the facilities.

- **Ethical Channel Management**

ACCIONA has a reporting channel, known as the Ethical Channel, in which both employees and providers or third parties can confidentially report any breach of which they are aware.

The legal basis for the processing of the data in this case is compliance with legal obligations for the investigation of suspected criminal offences.

- **Direct marketing**

In general, unless prior consent has been obtained, ACCIONA does not use Users' personal data for direct marketing purposes. As a User, you may at any time unsubscribe from direct marketing campaigns and object to the future processing of your personal data for such purposes by sending us an e-mail to the address of the Data Controller or by using the relevant "unsubscribe" option included in e-mails.

- **Automated decisions.**

ACCIONA does not carry out automated decision-making, including profiling, except in those cases in which Users are expressly informed of this and their express consent is requested.

For other specific processing operations, please see the section [Further information](#) of this Privacy Policy.

### **How long does ACCIONA keep Users' personal data?**

In general, the data will be kept i) for as long as is necessary for the purpose for which the data were collected and ii) for the applicable limitation periods, if liabilities might be incurred as the result of the processing.

**On a special basis:**

The data collected for the purpose of responding to requests or enquiries will be kept for the time necessary to be able to attend to the same, but never for longer than twelve months.

.- The data collected based on your consent will be kept for as long as such consent is not withdrawn.

.- In all other cases, Users will be informed of the retention periods applicable to the specific processing operation.

### **To whom is ACCIONA permitted to provide Users' data?**

At ACCIONA we undertake not to transfer or disclose our Users' personal information except as described in this Privacy Policy or, where applicable, as might be indicated at the time of collection of the data.

- We may exchange personal information with service providers, who are either ACCIONA companies or third parties and are in some cases contracted to perform services on our behalf. In these cases, the corresponding data processor agreements are signed whenever necessary, as established by the regulations on matters relating to data protection.
- We may disclose your personal information (1) if we are permitted or required to do so by law or by a process of law (such as a court order or subpoena); (2) to law enforcement agencies or other public officials to comply with a lawful and legitimate request; (3) whenever we consider this necessary to prevent physical harm or financial loss; (4) to establish, exercise or defend our legal rights; (5) in connection with an investigation of suspected or actual fraud or illegal activity; or (6) with Users' express and informed consent.
- We reserve the right to transfer to a third party any information we hold about Users in the event of any actual or potential transfer or sale of all or part of our business or assets (including in the event of any merger, acquisition, joint venture, restructuring, assignment, dissolution or liquidation) or other structural or business operation. In this case, such third parties will be required to ensure levels of protection comparable to those provided by ACCIONA with respect to the information to be shared.
- ACCIONA is a global and interconnected company, hence we may exchange personal information within companies of the Group in the context of the centralisation of certain activities carried out by them as a corporate Group. You can look up the corporate structure of ACCIONA at any time in the annual report containing the most recent consolidated annual accounts, <https://www.accionacom.es/accionistas-inversores/informacion-financiera/cuentas-anales/>. Nevertheless, this transfer, assignment and processing of personal data within ACCIONA is carried out under the data protection laws in force and through the adoption and application of adequate guarantees designed to ensure the protection of Users' privacy and fundamental rights and freedoms. In the event of such a transfer, this will be indicated for the specific processing operation and will require Users' consent.

Likewise, ACCIONA would inform you that some of these service providers, third parties or Group companies may be located in territories outside the European Economic Area that do not provide a level of data protection comparable to that of the European Union. In such cases we transfer Users' data with appropriate safeguards, maintaining at all times the security of such data; these may include the formulation of Standard Contractual Clauses approved by the Commission, the content of which may be examined by clicking on the following link: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_es](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_es)

### **What are Users' rights whenever we process their data?**



Users may exercise their rights of access to or rectification, erasure or portability of their data, and/or the restriction of or objection to the processing of such data, by contacting the corresponding Data Controller, by writing to the Personal Data Protection Department at Avenida de Europa, 18, Parque Empresarial La Moraleja, 28108 Alcobendas (Madrid) or by sending the form available at the following link: [https://www.accionacom/privacy-policy/?\\_adin=0183579827#](https://www.accionacom/privacy-policy/?_adin=0183579827#). If we consider this necessary to be able to identify you, we may request a copy of a document proving your identity.

You may likewise, at any time, withdraw the consent given by writing to the above address, and by filing a complaint with the relevant data protection Supervisory Authority (<https://www.agpd.es/portalwebAGPD/index-ides-idphp.php>) and, in particular, with the Spanish Data Protection Agency ([www.aepd.es](http://www.aepd.es)).

**Observation:** *During periods of an exceptional nature such as States of Alarm or Emergency, which imply periods of confinement, or other external disturbances such as natural disasters, extreme weather conditions or wars, rights which are exercised by ordinary mail rather than through the email account will have a longer response time than usual, with response times being re-established once the recommended confinement period has been lifted.*

## Further information

### ▪ Attendance at ACCIONA Events

At those functions, training sessions, meetings, initiatives, etc. (hereinafter, “Events”) that are organised or promoted by ACCIONA at or away from its facilities, we may request Users to provide us with personal data in order to properly manage the Events and attendance at them. As an illustration, the subject matters that these data may be related to include but are not limited to the management of access, accreditation, means of transport and travel, accommodation, catering, delivery of related documentation, etc. This processing will be based on consent, moreover in certain cases, on the performance of a contractual relationship or statutory obligation.

This data may have to be transferred to any of the service providers or collaborating or sponsoring entities that participate or are involved in the Event, and Users will in each case be duly informed of this. As a general rule, we will only keep this information for the period of time strictly necessary to hold the Event and, where applicable, to comply with the limitation periods that may prove to be applicable.

**Image:** In addition to the processing done as the result of the need to ensure the security and surveillance of our facilities, it is possible that, as a consequence of Users’ participation in Events, their image, and on occasions their voice, may be captured and processed by ACCIONA by means of photographs and/or video recording. Where Events entail such processing, we shall expressly inform Users. This processing may be for internal or external purposes and/or for the purposes of promoting Events; consequently the said material could be used to reproduce the Event, distribute or transform it, communicate it publicly, set a date for it and make it available in any format or medium (including, as an illustration, but not limited to exploitation through analog or digital means and online, such as social profiles, websites or intranet owned by ACCIONA GROUP entities), without the said activities conferring any right to remuneration, consideration or economic gain on Users.

This processing is based on consent, either, whenever possible, as the result of Users giving their individual, explicit consent, or from their attendance at Events for which they were informed beforehand of the processing of their image. Users’ authorisation extends worldwide, is





transferable (inside and outside ACCIONA) and remains in place for the entire duration of the intellectual property rights. Users may withdraw their consent at any time, through the appropriate channels.

The intellectual and industrial property rights over the materials generated on the occasion of the events and activities accrue exclusively to ACCIONA.

- **Social networking sites.**

At ACCIONA we use social networks such as LinkedIn, Twitter, Facebook, Google+, Instagram and YouTube to share our content. We act in such networks as the Data Controller in charge of the data published by us, always processing such data in accordance with the terms and conditions established for each one of the social networks.

Interaction with Users through the use of such profiles or tools may involve the international transfer of data of an analytical and technical nature in relation to the Site and the social network profiles, with the data provided by Users through such profiles being processed on the servers of the social network companies.

Below you will find a series of links to further information on the **specific processing of personal data**. You will also find information about the website in the legal notice.

- **Applicants**

<https://mediacdn.acciona.com/media/kkcjqz2f/politica-privacidad-candidatos-en.pdf>

- **Suppliers**

[https://acciona-procure.bravosolution.com/web\\_en/data\\_protection.html](https://acciona-procure.bravosolution.com/web_en/data_protection.html)

- **Ethical channel**

<https://www.acciona.com/shareholders-investors/corporate-governance/rules-governance/compliance/>

- **Customers:**

- Motorbike sharing

[https://movilidad.acciona.com/en\\_ES/privacy-and-data-protection-policy/](https://movilidad.acciona.com/en_ES/privacy-and-data-protection-policy/)

- Water

[https://www.acciona.com/es/area-clientes/agua/?\\_adin=0183579827](https://www.acciona.com/es/area-clientes/agua/?_adin=0183579827), where you can consult the Privacy Policy depending on which Municipality you are a customer of.

- Solar farms

<https://huertasolar.acciona.com/politica-de-privacidad/ExternInnerPage>

- Acciona Green Energy Developments

<https://comercializadoragreenenergy.acciona.es/es/es/>

- Real property

<https://inmobiliaria.acciona.com/privacy-policy/>

<https://inmobiliaria.acciona.com/clientes/en>

- **Other businesses:**

- Bestinver

[https://www.bestinver.es/en/politica-de-privacidad\\_en/](https://www.bestinver.es/en/politica-de-privacidad_en/)





### **Validity**

If any change is made to the Privacy Policy and to information management practices, this will be reflected in a timely manner, however ACCIONA may supplement, amend or replace the said Policy whenever it considers this necessary.

This Privacy Policy is published in Spanish and English; in case of any discrepancy between the two versions, the Spanish version will prevail.

Last updated: 11 October 2021.