

# PRIVACY POLICY

## General information

Vías y Construcciones S.A., domiciled at 50, Avenida del Camino de Santiago, 28050, Madrid (Spain), Tax Identification Number A-28017986 and telephone (+34) 91 417 98 00, is committed to the protection of all personal data processed in the course of its business activities.

These data processing operations are adequate, justified, relevant and not excessive for the scope and purposes in question, and comply at all times with the applicable legislation in force: EU Regulation (EU) 2016/679 adopted by the European Parliament and the Council as of 27 April 2016 (General Data Protection Regulation or GDPR), general national legislation and sector-specific legislation.

### [a\) Categories of Data Subjects](#)

Vías needs to process the personal data of different categories of data subjects and for different purposes. The main groups of people whose personal data are processed are:

- Employees.
- Own legal representatives.
- Suppliers.
- Visitors to corporate offices and facilities.
- Legal representatives and contact persons of other entities or persons.
- Beneficiaries covered by employee insurance policies.
- Ethical Channel users.
- Job applicants.

The personal data of each of these groups may be used in different ways and shared with different natural or legal persons, depending on the specific purpose for which they are to be used. Below is the basic information on the processing operations related to these groups of data subjects.

Under no circumstances will Vías use personal data for automated decision-making.

### [b\) Security applied to data processing](#)

In accordance with current applicable regulations, Vías has implemented appropriate technical and organisational security measures aimed at guaranteeing integrity, availability and confidentiality of personal information, thereby taking into account the nature, scope, context and purposes of each of the processing operations we carry out. We also take into account the probability of a risk occurring and the impact it would have on the persons whose personal data we handle if such risk were to materialise, pursuant to the foregoing.

In general, but not exclusively, the following security measures have been adopted:

- Allocation of user permissions based on the functions they are to perform.
- Physical and logical access controls.
- Back-ups.
- Designation of a Data Protection Officer.
- Management and control of media containing personal information.
- Designation of a Security Officer.
- Development of data protection policies and protocols.
- Encryption of sensitive information and biannual audits to reinforce data processing operations where the level of risk is the highest among all the data processing operations we carry out.

In addition, other verification processes are carried out periodically to help assess that the security measures implemented in each of the data processing operations (not only in those with the highest risk) are effective, and to ensure continuous improvement in order to guarantee data processing security, whilst taking into account advances in technology.

### **c) Rights of data subjects**

You have the right to receive confirmation from Vías as to whether your personal data is being processed.

- **Rights of access, to rectification and to erasure of your data**

You have the right to access your personal data, as well as to request rectification of data that are inaccurate or, where appropriate, to request erasure of your data when, among other reasons, they are no longer necessary for the purposes for which they were collected.

- **Right to restriction of processing**

In certain circumstances, you may request that the processing of your data be restricted, in which case only the minimum data will be kept for the exercise or defence of claims.

- **Right to object**

Users may request that their data not be processed. This right will be complied with unless there are compelling legitimate reasons or it is necessary for the exercise or defence of possible claims.

- **Right to data portability**

Users have the right to have their data processed by virtue of the consent they have given us or by virtue of a contract entered into, transmitted to them in a structured, commonly used and machine-readable format (interoperable format).

- **Right to withdraw consent**

You are entitled at any time to withdraw your consent to the processing of your data that we carry out pursuant to the consent you have given. Upon withdrawal, the processing will cease, unless there is another cause that legitimises us to continue the processing. However, said withdrawal will not produce retroactive effects, and therefore the processing carried out up to that time will not be affected.

- **How to exercise your rights**

To exercise any of these rights, you may contact Vías y Construcciones, S.A. at the postal address 50, Avenida del Camino de Santiago, 28050, Madrid (Spain), or by e-mail at [LOPD@vias.es](mailto:LOPD@vias.es).

We also inform you that if you consider there has been any type of infringement regarding the processing of your personal data, you have the right to file a complaint with the competent supervisory authority (in Spain, the Spanish Data Protection Agency, [www.aepd.es](http://www.aepd.es), or a similar agency available in any other country).

### **d) Data Protection Officer**

For further information, or for any other question regarding the processing of your data, please do not hesitate to contact our Data Protection Officer at:

Address: 50, Avenida del Camino de Santiago, 28050, Madrid (Spain)

E-mail: [LOPD@vias.es](mailto:LOPD@vias.es)

## Data protection of the website and job applicants

Vías does not use cookies to obtain information about users, nor does it register access IP addresses, and does not have any web page analytical tool enabled.

### a) Purpose

Data processing is limited to one of the following purposes:

- To deal with queries from users who contact us at the addresses provided and to send the information requested.
- Receive and handle CVs in the recruitment processes the user participates in.

### b) Legitimacy

By providing personal data through the forms provided on the website ("Join us") or by using the e-mail address provided and sending your contact details, the user expressly consents to Vías being able to process such data under the terms of this Privacy and Data Protection Policy clause and for the purposes expressed.

### c) Data retention

Contact data will be kept for as long as the relationship is maintained and erasure thereof has not been requested. In any case, the data retention periods shall be established in accordance with the applicable legal statute of limitations.

Data related to job applications will be kept for a maximum period of 5 years if erasure thereof has not been requested and always in compliance with the applicable legal limitation periods. If you wish to have your application erased, you can request it by email at the following email address: LOPD@vias.es.

### d) Data recipients

No assignments or transfers of your data are envisaged, other than to companies belonging to Dragados Group, pursuant to the purposes specified in this Policy.

## Data protection of ethical channel users

### a) Purpose

Vías uses your data in order to ensure proper management of the ethical channel, coordination of Compliance systems and internal legal advice as well as to defend our rights and interests, to detect offences and prevent any criminal liability being brought against Vías and to prevent any type of conduct contrary to the company's internal or external regulations.

### b) Legitimacy

Data processing is based on the public interest consisting of creating and maintaining an information system for internal complaints and investigating possible irregularities or acts contrary to ethics, legality or corporate rules, on the legitimate interest of Vías in preventing such conduct and in seeking to defend the legitimate rights and interests of Vías, as well as on the legal obligation to resolve the complaints and queries made, and, where appropriate, for the filing, pursuit or defence of claims.

Processing of the personal data of the complainant, respondent or third parties is strictly necessary to manage the complaint and to comply with the aforementioned purposes and legal obligations. Under no circumstances will Dragados Group carry out automated decisions based on the data submitted.

### c) Data retention

Dragados Group will keep a record of all complaints received on a confidential basis. Records shall not be kept for longer than necessary and shall be retained for as long as necessary to comply with any applicable legal requirements at any given time.

More specifically, Dragados Group will keep the personal data of the complainant for the time necessary to decide whether to initiate an investigation into the facts or conduct reported and, once decided, this data will be removed from the Ethics Channel, and may be processed outside the system to investigate the facts for the time necessary to reach a

decision. Once the investigation of the report has been completed and any appropriate action has been taken, the data of those reports that have been processed shall be duly blocked in order to comply with the legal obligations that may apply in each case.

In any case, personal data will be deleted from the Ethical Channel within a maximum period of three (3) months from the date of input, unless it is retained for an additional length of time in order to comply with legal and corporate obligations and may continue to be processed outside the Ethical Channel for as long as necessary in the event that investigation of the complaint had not concluded.

If the complaint is not acted upon, the information may be retained anonymously.

#### **d) Data recipients**

Personal data collected in the context of a complaint made through the complaint channels may be processed or communicated to the following parties where necessary:

- The service provider of the platform which manages the complaints channels;
- Vías' Compliance Body;
- Authorised representatives of Dragados Group, where necessary;
- External advisor who may provide assistance in assessing the report, investigating the matter or advising Dragados Group on the issue at hand;
- Police or other regulatory or law enforcement authorities.

The data may also be submitted, together with the complaint made, to a division or subsidiary of ACS Group in the event that the facts reported affect them or should be investigated by them.

No international data transfers are envisaged, other than within Dragados Group.

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