



## PERSONAL DATA PROTECTION POLICY

Subsequent to review by the competent Committee and at the Committee's recommendation, the Board of Directors of Sacyr, S.A. has approved this *Personal Data Protection Policy* (the "**Policy**") in the furtherance of its general nondelegable duty to set the SACYR Group's global policies and strategies.

This *Policy* is a component of the "SACYR Group Regulatory Compliance Model for Criminal Prevention and Competition Defence" (the "**Regulatory Compliance Model**").

The "SACYR Group's Code of Conduct" (the "**Code of Conduct**") is the internal standard that has been taken as the basis for the Regulatory Compliance Model. This *Policy* adheres to the values propounded in that Code of Conduct integrity (honesty, transparency) and elaborates one of the Code's guidelines for conduct in the Marketplace: the one concerning personal data protection.

Accordingly, this *Policy* is to be read and understood in combination with the Code of Conduct and with the SACYR Group's other policies based on that Code.

### 1. Purpose

The main objectives of this *Policy* are:

- To set out the fundamental principles and obligations imposed by personal data protection regulations on the companies and individuals making up the SACYR Group.
- To set the guidelines to be followed within the Group to guarantee the privacy of customer, supplier and employee data and, in general, of all data groups involved, identifying the most appropriate lawful basis for processing personal data carried out in accordance with the legislation in force.

This *Policy* is complemented by the specific internal standards that develop it and which are created according to the needs of each SACYR Group company in this matter.

### 2. Scope of application

This *Policy* applies to:

- all subsidiaries or majority-owned entities over which Sacyr, S.A. exercises effective control, either directly or indirectly, on the basis of their own characteristics. For the purposes of this document, all these companies are referred to as the SACYR Group.
- all members of management bodies, executives, and employees of the SACYR Group entities referred to above, irrespective of where they are located.

- all third parties, individuals, and/or legal persons related to the SACYR Group in all respects in which this *Policy* applies to them, and these parties are expected to comport themselves in a manner that conforms to the *Policy*.

Where the SACYR Group carries out activities outside Spain, this *Policy* is to be brought into alignment with any more restrictive local legislation that may be applicable.

### **3. General principles regarding the protection of personal data**

In order to achieve the implementation of the objectives included in this *Policy*, the SACYR Group activities shall be guided, with regard to personal data, by the following principles:

- They must be processed in a lawful, proportionate and transparent manner.
- They must be collected for specific purposes and limited to the purpose for which they were collected.
  - They must be accurate and always kept up to date.
  - The integrity and confidentiality of the data stored must be guaranteed.
  - They should be stored only for the time necessary for the purposes of processing; after this time, they should be erased or blocked.

Companies should have proactive responsibility, applying, from the origin, timely and effective measures in relation to the data they process.

### **4. SACYR Group commitments to data protection**

As reflected in the principles of the SACYR Group expressed in its Code of Conduct, respect for legality, integrity, honesty, transparency and respect for the fundamental rights of individuals are basic ethical principles that must govern any action of its members, who undertake to maintain at all times behaviors in accordance with the applicable regulations in force and, in particular, those relating to the protection of personal data.

The SACYR Group, at the express wish of the Board of Directors of Sacyr, S.A., which is formalised in this *Policy*, expressly states its position of absolute respect for the privacy and integrity of individuals and its rejection of any breach of the principles relating to the protection of personal data included in the previous section, assuming the following commitments and obligations in the processing of the personal data required to carry out its activity:

- Comply with the legal requirements, regulations or those derived from international agreements that are applicable, and align with the standards and best practices in the field internationally recognized.
  - Supervise that neither the SACYR Group companies nor their employees collect, process, store, preserve, communicate or use personal data in a manner that contravenes the aforementioned regulations, respecting the legitimate rights of the holders of this data.

- Respect people's right to privacy, protecting personal data entrusted specifically by:
  - its employees, processing in the legally established terms, their personal data, particularly, their health or economic data.
  - third parties related to the Group such as customers, suppliers, partners or institutions and the general public.

In order to comply with these commitments and obligations, the SACYR Group has adopted the following measures:

- Create an organizational structure responsible for ensuring data protection.
- Develop, based on the regulation related to the protection of personal data, internal regulations on the subject adapted to the activity carried out by the Group.
  - Inform, train and raise awareness among the staff about the importance of complying with these regulations.
  - Adapt the policies and procedures existing in the Group to integrate the protection of personal data into the business processes of all areas, implementing technical and organisational measures that guarantee the security and confidentiality of the information handled by the Group in any field.

All this in order to maintain an internal culture of compliance and integrity that is permanently aligned with the principles stated in this *Policy* and in the Code of Conduct, to which any person wishing to work with the Group must necessarily adhere.

## 5. SACYR Group Privacy Governance Model

The organisational structure for the protection of personal data that the Group has set up is made up of the following bodies and persons involved:

- **Data Protection Officer (DPO) of the SACYR Group:** a position which, among other things, is responsible for supervising compliance with regulations, informing and advising the Group on data protection matters, serving as the contact point with the supervisory authority. The SACYR Group DPO can be accessed at: [dpo@sacyr.com](mailto:dpo@sacyr.com).
- **SACYR Group Security and Privacy Committee:** a committee chaired by the DPO and made up of staff from the personal data protection areas and the Information and Communications Technology (ICT) Department, whose task is to address the Group's privacy and security issues from an integrated and joint perspective.
- **Data protection managers in each business line and in certain Group companies:** they are the link between the business areas and the DPO and collaborate with the latter by providing information on new data processing or on any issue or incident that may arise, guaranteeing the implementation of the measures established in the unit or company to which they belong.

This Personal Data Protection *Policy* was approved by the Board of Directors of Sacyr, S.A. on November 4, 2020.