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DATA PROTECTION

ETHICS CHANNEL OF  
ACCIONA GROUP



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In compliance with regulations in force on the subject of personal data protection, we notify interested parties that the personal data collected through the Ethics Channel will be processed by the Group Company in relationship with which the facts are communicated, for conducting the appropriate investigation and management of the complaint.

The legal basis for processing is the legitimate interest of Group companies in applying this type of systems to ensure compliance with regulations, as well as your consent by sending the claim, since the information requested is of a mandatory nature and if it is not present then this will prevent the management of claim.

The data will be stored during the time necessary to take the procedural steps for internal investigation that may be necessary and, when relevant, to apply the contractual, disciplinary or court measures considered appropriate. After this, a control will be implemented in the application or the database in order to prevent the processing of these data, but it will nevertheless be possible to access the data if Public Administrations, Judges and Courts so request for determining any liabilities, and only during the limitation period of these liabilities.

The data received through the system (data of claimants and accused persons) may be communicated to other Group companies if this communication is necessary for the investigation. In this case the data will be communicated confidentially, and respecting principles of security, to the competent department of the receiving entity, which, although it may be located in countries that do not grant a level of data protection equivalent to that of the European Union, will provide guarantees regarding the claim management of improprieties equivalent to the guarantees of the Group company that is the data controller.

Adequate measures have been taken to guarantee that the identity of the claimant remains confidential and that it is not disclosed to the accused party. We inform you nevertheless that it may be necessary to disclose your identity to the persons involved in the investigations or in the administrative or court procedures initiated afterwards as a result of the investigation conducted.

The use of the Ethics Channel obliges us to remind you that allegations made that are knowingly false or made with reckless disregard to the truth can result in criminal or civil liabilities under the terms specified in the regulations in force.

Interested parties will have the right to object, at any time and for legitimate reasons based in their particular situation, to the processing of the data regarding them. You may also exercise your rights to access, rectification, erasure, portability, and restriction either by writing to the Data Protection Department at Avda. de Europa nº 18, 28108 Alcobendas (Madrid), or by sending an e-mail to the following e-mail address: [protecciondedatos@acciona.com](mailto:protecciondedatos@acciona.com). You also will have the right to make a claim before the Control Authority (Spanish Data Protection Agency [www.agpd.es](http://www.agpd.es)).

Data of Group companies as Data controllers can be found at the following [link](#)