

PERSONAL DATA PROTECTION POLICY

REASONS

Digitisation is being introduced in all areas of business activity. Consequently, personal data are increasingly more likely to be processed, in the broadest sense of the meaning.

Within this context and considering that ACCIONA has acquired the commitment to comply with the specific regulations in force of every country where it operates or is present, therefore adapting its information systems to the technical and organisational measures that may be necessary, especially for legal regulations regarding personal data processing, it has been deemed that one of the priority aspects is to identify the personal data and the processing thereof for which ACCIONA is the controller and to protect that data from threats and security risks, as well as ensure compliance with the legal scheme.

Finally, a breach of this regulatory framework is subject to major financial penalties, without prejudice to the harm that could be caused to the image and reputation of ACCIONA.

PRINCIPLES AND RIGHTS OF PERSONAL DATA PROTECTION

The principles included in applicable legislation regarding personal data protection indicate how the rights of data subjects should be recorded, treated, assigned and exercised with respect to personal data in order to ensure the privacy and other fundamental rights of citizens. These principles are stated below:

- Legality, loyalty and transparency in data processing.
- Limitation of purpose.
- Minimisation of data with respect to the purposes for which data are processed
- Accuracy.
- Limitation of the time kept on file.
- Integrity and confidentiality.
- Proactive responsibility.

Data protection rights are those that give data subjects the power to control their own personal data and the capacity to have the data at their disposal and make decisions about the same. These rights are stated below:

- Right of access of the data subject.
- Right of rectification.
- Right of deletion or erasure.
- Right to the limitation of processing.
- Right to the portability of data.
- Right of objection.

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Purpose

The main purpose of this policy is to establish the company's commitment regarding personal data protection and to define a framework that allows ensuring said protection and respecting the aforementioned principles and rights that are established by applicable legislation.

Scope of application

This policy must be complied with by all organisational units or companies and entities of the ACCIONA Group (defined as those over which ACCIONA, S.A. directly or indirectly exercises control over the capital and/or management thereof), as well as their employees, suppliers, shareholders and customers (among others), which record or process personal data.

In consortiums or joint ventures in which ACCIONA does not hold control, ACCIONA's representatives will observe the precepts of this policy and will promote the application thereof, to the extent possible.

In turn, it will be applicable in all phases of the life cycle of information that may contain personal data (generation, distribution, storage, processing, consultation and destruction).

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Commitments

ACCIONA's commitments regarding personal data protection, which ensure compliance with the specified principles and rights, are detailed below:

- Compliance with applicable legal and regulatory requirements and alignment with internationally recognised standards and good practices.
- Driving the development and implementation of our own body of regulations, thereby establishing the bases for integrating protection in the processing of personal data in all processes of the organisation and guaranteeing respect for the rights of data subjects.
- Integrating data protection in all phases of the life cycle of information, technology systems and organisational or technological processes, therefore protecting all media that are in charge of processing, communicating or storing information.
- Understanding data protection as an integral process oriented at continuous improvement (planning, doing, verifying and acting).
- Developing a management model based on the criteria of legality and proportionality, and aligned with business strategies, which will allow adequate analysis and management of the risks that might affect the principles of personal data protection and therefore adopting the necessary measures for the protection thereof.
- Ensuring the governability of this management model by creating an organisational structure for the protection of personal data and the definition of responsibilities from a proactive approach.

The development of these commitments will allow ACCIONA to obtain the following benefits:

- Improvement of personal data protection based on a process of continuous improvement and the availability of resources, knowledge, procedures and tools.
- Consolidation of trust in the organisation by customers and suppliers, accompanied by an improved public image.
- Assurance of compliance with legal and ethical requirements, thus decreasing the costs resulting from a breach of personal data protection regulations, through the progressive implementation of security controls.

RESPONSIBILITIES REGARDING PERSONAL DATA PROTECTION

ACCIONA Management will require and ensure compliance with personal data protection by the entire organisation and by all people with access to personal data, including its suppliers, contractors and shareholders, among others.

Every division or business unit will be responsible for implementing the necessary measures that ensure an adequate level of security within the scope of their business.

In turn, any person with access to ACCIONA information that may contain personal data, whether internal personnel or external personnel, will be bound to comply with the aspects set forth in the policy, regulations, procedures or any other document pertaining to personal data protection. A breach thereof will be subject to application of the corresponding disciplinary scheme determined by ACCIONA.

ORGANISATIONAL STRUCTURE FOR PERSONAL DATA PROTECTION

To guarantee adequate management of personal data protection, the following organisational structure is established:

- **Personal Data Protection Committee:** composed of a representative from the corporate areas of ICT, HR and Legal Advising. This body, through periodic meetings, will be in charge of establishing personal data protection guidelines; defining short-, medium- and long-term strategies; ensuring appropriate management of risk; and leading the governance model of personal data protection.
 - Unit at ACCIONA that is responsible for implementing the technical measures that are necessary for protecting personal data: Information and Communication Technologies Management will be in charge of implementing and managing ACCIONA's strategy regarding personal data protection, for developing a regulatory body and for defining, within its scope of action, adequate technical measures for ensuring the protection of personal data.
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- **Managers of personal data protection at every organisational unit or company of ACCIONA:** All personnel of the businesses that, in the development of their work, may manage or have access to personal data will ensure compliance with the security measures established at the organisational unit or company to which they belong in order to guarantee the security of such personal data, therefore integrating data protection into the business processes.

ENTRY INTO FORCE

This personal data protection policy will enter into force as from the publication date hereof.

