

Privacy Policy

This policy has been published by the TÉCNICAS REUNIDAS group on behalf of itself and its affiliated and subsidiary companies and is addressed to all members of the TÉCNICAS REUNIDAS group, as well as to those maintaining a contractual relationship with companies within the TÉCNICAS REUNIDAS group, and any other stakeholders who report the existence of an irregularity.

The Internal Reporting System ("Whistleblowing Channel") is centrally managed from Spain by TÉCNICAS REUNIDAS, S.A. on its own behalf and on behalf of the companies forming part of the corporate group.

The TÉCNICAS REUNIDAS group, hereinafter referred to as "we", makes the following Privacy Policy available to all users of the Whistleblowing Channel in order to provide information on how we process personal data and protect privacy and personal information.

Please note that any data and information provided through the Whistleblowing Channel shall be subject to the strictest confidentiality and shall be processed exclusively by authorized personnel responsible for the management and handling of the report, incident or irregularity.

We recommend that you read this Privacy Policy carefully. This policy may be amended or updated from time to time to reflect changes in our practices regarding the processing of personal data or changes in applicable law.

1. Who is the data controller?

The controller of the personal data processed through the Whistleblowing Channel is:

TÉCNICAS REUNIDAS, S.A.
Avda. de Burgos, 89 – Adequa, Building 6
28050 Madrid (Spain)

Email: privacy@tecnicasreunidas.es

Data Protection Officer

TÉCNICAS REUNIDAS has appointed a Data Protection Officer ("DPO"), whom you may contact regarding any issue related to the processing of your personal data:

Email: privacy@tecnicasreunidas.es

2. For what purposes do we process your personal data?

Personal data provided through the Whistleblowing Channel shall be processed for the following purposes:

- To comply with applicable legal obligations relating to internal reporting systems, crime prevention and corporate compliance.
- To manage, analyse and investigate reports, communications or queries received.

- To process potential breaches of law, internal regulations or corporate policies.
- To adopt any disciplinary, legal or contractual measures that may be appropriate.
- To prevent compliance risks and strengthen internal control mechanisms.
- To respond to requests from judicial, administrative or regulatory authorities.

The System may allow anonymous reports in accordance with applicable legislation.

Personal data shall not be used for purposes incompatible with those described above.

3. What personal data is processed?

Depending on each case, the following categories of personal data may be processed:

Data relating to the Informant

- Identification and contact data.
- Professional data.
- Any other information included in the report (which may potentially include special categories of personal data).

Data relating to affected persons or third parties

- Identification and contact data.
- Professional data.
- Any other information included in the report (which may potentially include special categories of personal data).

Where special categories of personal data or information relating to criminal offences are provided, such data shall only be processed where strictly necessary and in accordance with applicable legislation.

Users of the Whistleblowing Channel are requested to provide only data that are adequate, relevant and limited to what is necessary for the proper management of the report.

How is the information obtained?

Personal data may be obtained:

- Directly from the reporting person through the Whistleblowing Channel.
- From other persons involved in the investigation.
- From companies within the TÉCNICAS REUNIDAS group.

- From legitimate internal or external sources necessary for the investigation of the reported facts.

Where personal data are not obtained directly from the data subject, the information required under applicable data protection legislation shall be provided unless one of the legally established exemptions applies.

4. What is the legal basis for the processing of your data by TÉCNICAS REUNIDAS?

The processing of personal data is based on:

- Compliance with legal obligations applicable to TÉCNICAS REUNIDAS, including Spanish Law 2/2023, of 20 February, regulating the protection of persons who report regulatory breaches and combating corruption, as well as any other applicable legislation relating to compliance and crime prevention.
- The establishment, exercise or defence of legal claims.

Where special categories of personal data are processed during the handling of a report or internal investigation, such data shall only be processed where strictly necessary and pursuant to the exceptions provided for in Article 9.2 of the General Data Protection Regulation, in particular where processing is necessary for reasons of substantial public interest or for the establishment, exercise or defence of legal claims.

5. Disclosure of personal data to third parties

In order to achieve the processing purposes described above, TÉCNICAS REUNIDAS may disclose your personal data to:

- Entities within the TÉCNICAS REUNIDAS group involved in the management or investigation of the reported facts.
- Authorized personnel responsible for the management of the System and internal investigations.
- External advisors, auditors or service providers acting as data processors.
- Competent judicial, prosecutorial, administrative or regulatory authorities.
- Law enforcement authorities, where appropriate

Personal data shall not be disclosed to third parties other than those mentioned above unless required by law.

In the event of international transfers of personal data arising from the global management of the System within the TÉCNICAS REUNIDAS group, such transfers shall be carried out subject to the appropriate safeguards established under applicable data protection legislation.

6. What must you guarantee when providing your personal data?

Users are required to maintain confidentiality regarding the report submitted, as well as regarding the identity of the person or persons concerned and the facts and documentation related thereto.

The Whistleblowing Channel may not be used for illegitimate, personal or bad-faith purposes. If it is confirmed that a member of the TÉCNICAS REUNIDAS group has knowingly submitted a false report, such conduct may give rise to disciplinary proceedings in accordance with the applicable collective bargaining agreement, without prejudice to any other liabilities, including criminal liability, that may apply.

Users providing personal data through the Whistleblowing Channel declare and warrant that they are of legal age in accordance with the legislation applicable in their country and shall be fully responsible for such declaration.

7. Information Security

In response to TÉCNICAS REUNIDAS' concern to ensure the security and confidentiality of personal data, appropriate technical and organizational measures have been adopted to protect personal data and prevent its loss, misuse, alteration, unauthorized access or theft.

8. Retention of personal data

Your data shall be retained within the Whistleblowing System only for the period necessary to determine whether an investigation into the reported facts should be initiated. In any event, your data shall be retained in accordance with the legal retention periods applicable under current data protection legislation.

As a general rule:

- Data that are not necessary for the investigation shall be deleted without undue delay.
- Reports that are not processed may only be retained in anonymized form.
- Where applicable, data may be blocked for the duration of the statutory limitation periods relating to potential legal liabilities.

If you would like further information regarding the retention periods applied by TÉCNICAS REUNIDAS, you may contact our Data Protection Officer at privacy@tecnicasreunidas.es.

9. Your legal rights regarding your personal data

TÉCNICAS REUNIDAS informs you that you have the right to obtain confirmation as to whether or not personal data concerning you are being processed.

Likewise, you are entitled to exercise the following rights regarding your personal data::

- **Right of access:** You have the right to access your personal data in order to know which personal data concerning you are being processed.
- **Right to rectification or erasure:** Under certain circumstances, you have the right to rectify inaccurate personal data concerning you, as well as to request the deletion of your

data where, among other reasons, the data are no longer necessary for the purposes for which they were collected.

- **Right to restriction of processing:** Under certain circumstances, you may request the restriction of the processing of your data, in which case we will only retain the data for the exercise or defence of legal claims.
- **Right to object:** Under certain circumstances and for reasons related to your particular situation, you may object to the processing of your data, in which case we will cease processing them unless compelling legitimate grounds or the exercise or defence of legal claims require otherwise.

The exercise of these rights may be restricted where necessary to safeguard the confidentiality of the investigation, protect the identity of the reporting person or safeguard the rights of third parties, in accordance with applicable legislation.

These rights may be exercised by sending a written request to:

TÉCNICAS REUNIDAS
Avenida de Burgos 89, Adequa Building 6
28050 Madrid (Spain)

or by email to: privacy@tecnicasreunidas.es

Finally, please note that you may lodge a complaint with the competent supervisory authority for data protection matters. In Spain, this authority is the Agencia Española de Protección de Datos (AEPD).

However, in the first instance, you may submit a complaint to the Data Protection Officer, who shall resolve the complaint within a maximum period of two months.

10. Contact details

If you have any comments, questions or suggestions regarding this Privacy Policy or any other matter relating to the processing of your personal data, please contact:

TÉCNICAS REUNIDAS
Avda. de Burgos, 89
Adequa – Building 6, Floor 2
28050 Madrid (Spain)

Attn: Data Protection Officer
Email: privacy@tecnicasreunidas.es