

PRIVACY POLICY

ACCIONA Group Employment Channel Privacy Policy.

This Privacy Policy informs you of the processing of personal data that you, as an Applicant, supply to the ACCIONA Group via the Employment Channel.

The ACCIONA Group Employment Channel is the platform used by Acciona, S.A., and all the companies in its group, to publish and manage the recruitment processes of all its lines of business and in all the countries in which it operates.

This Privacy Policy will apply when:

- You register as a user.
- You participate in any of the recruitment processes for professionals or students on work experience.
- When you have given your consent to be registered as a “potential candidate”.
- When you register with the Acciona Academy Programme.
- When, as an employee, you participate in an internal mobility process.
- When you browse the Employment Channel and/or make use of its functionalities or services.
- When you receive our communications or newsletter.
- When you have been selected as a finalist in order to process your hiring or, in the case of internal mobility, your change of position.
- In general, every time you interact with us using the mailboxes provided for that purpose, as a result of our personnel recruitment activity.

WHO PROCESSES THE PERSONAL DATA?

Acciona, S.A., acts as data controller in relation to:

- The data derived from browsing the Employment Channel and/or using its functionalities or services;
- Use of the data derived to arrange sending the newsletter;
- The CV data for the Acciona Academy Programme;
- When you interact with any of the ACCIONA Group entities using the mailboxes provided for that purpose.

In all other cases (data used to manage your CV and establish contact with applicants and “potential candidates”, whether via email, SMS, or telephone; your CV data in managing internal mobility; that provided when selected as finalist in order to arrange your change of position, etc.), the **ACCIONA Group entity that publishes the offer** for which you applying or in whose process you are participating, will be data controller.

The data controller in respect of Applicants' data is each of the ACCIONA Group companies that publishes the offer and that are identified [here](#) (the "Company / Companies"). For reference purposes, the entity is identified:

WHAT PERSONAL DATA DO WE PROCESS?

Via the Employment Channel, we gather **personal data** on identification, academic and professional data, data on the job offer published, etc. This data may vary depending on the vacancy and the geographic location of the same, in order to comply with the requirements corresponding to each applicable legislation. Likewise, we will gather and process the information obtained in the tests carried out during the recruitment process.

The information requested in the different forms in the course of the process and identified with an asterisk (*) is **obligatory** and strictly necessary. Without it, we will not be able to manage registration and/or the application, deal with requests or instructions, contact you, send you our communications and/or newsletter, comply with our legal obligations or, therefore, the purposes of this processing.

Applicants, in accepting this Privacy Policy, warrant that the personal data supplied is **true, lawful and accurate**, assuming full responsibility for any inaccuracies and errors contained therein. You also undertake to keep your personal data up to date. Likewise, you assume full responsibility for any additional, non-obligatory information and/or documentation supplied by you in the free text fields envisaged on the platform or as attached documentation, in terms of the truthfulness, lawfulness, accuracy, suitability, sensitivity and confidentiality of its content, fully assuming the privacy risks associated with such information.

In order for the applicants or candidates to carry out certain **selection tests**, ACCIONA Group uses the services of specialist external suppliers who will be responsible for carrying out the corresponding tests and informing the ACCIONA Group responsible for the vacancy of the result of the same. For more information, you can consult the Privacy Policy of such suppliers. Passing these tests will be a major decisive part of the Recruitment process.

In the event you are selected as a finalist in any of the programmes and/or vacancies, we may request, depending on the legislation applicable in each case, the data necessary to be able to arrange the **formalisation of the contractual relationship** and process your registration as an employee in the corresponding public and private systems or, in the event of a vacancy in the Internal Mobility Programme, for the change of position.

The **data supplied by Applicants in relation to third parties**, will be processed for the purpose of checking and verifying the references supplied. By accepting this Privacy Policy, you consent to this processing, declare that the data is accurate and that you have informed the third parties of the content of this policy and of the corresponding Data Protection rights that correspond to them. The above notwithstanding, the

ACCIONA Group will use its best endeavours to act properly in relation to the processing of such third-party data.

HOW DO WE GATHER THE PERSONAL DATA?

We compile your personal data as an Applicant in the following ways:

- Personal data supplied directly as job applicants, personnel on work experience, potential candidates or participants in the Internal Mobility Programme,
- Personal data we receive from other sources, via head-hunters, employment websites, or contact persons who for reference purposes supply personal information on Applicants.

WHAT IS THE PURPOSE AND LEGITIMACY FOR THE PROCESSING OF THE PERSONAL DATA?

We will process your personal data for the following purposes:

- **Processing and managing the application and/or candidacy, as well as the job offer, work experience opportunity (including the management for the Acciona Academy Programme) and the Internal Mobility Programme of the ACCIONA Group**, by means of registration on, access to and browsing the Employment Channel platform, as well as communicating with Applicants and sending you information on the process. The legitimacy for this processing is the execution of the conditions of use of the Employment Channel platform, the acceptance of this Privacy Policy by consent and the legitimate interest of the ACCIONA Group in duly managing offers of employment and work experience. In cases in which you, as an Applicant, have expressly accepted that we can use your data for the purpose of assessing your application for other vacancies in the ACCIONA Group, the legitimacy will be the consent given. **Completion by applicants or candidates of certain selection tests.** The legitimacy for this processing is the legitimate interest of the ACCIONA Group in gathering as much information as possible on the applicants or candidates, in order to assess your aptitudes and skills for the vacancy in an objective and impartial manner.
- **Sending relevant information and/or the newsletter**, based on the consent requested.
- **Sending documentation for hiring.** If you are an Applicant chosen and accept the offer, you will be asked for the documents necessary to process your hiring. The list of documents will vary depending on each jurisdiction. The legitimacy for this processing is the existence of a legal obligation.

TO WHAT RECIPIENTS MAY WE SEND THE PERSONAL DATA?

The ACCIONA Group, in order to achieve the purposes described in the foregoing section, works with **external suppliers and computer applications**, with which it enters into the agreements required by the data protection legislation applicable in each case. Some of the suppliers may be located outside the European Union, including countries that apply a legal level of data protection that is not comparable to the level of protection applied in the EEA, which implies a possible international data transfer. In any event, such transfers are lawful and covered by the safeguards established in the legislation in force on data protection, as well as having recognised adequacy mechanisms, which may include formalising standard contract clauses approved by the EU on the transfer of personal information and processing that is secure and in line with this Privacy Policy.

In those recruitment processes in which companies offering head-hunter or job offer and recruitment process management services, the personal data of Applicants may be sent to such entities under the service agreement entered into in order to manage your potential hiring. This communication is necessary for you to participate in the recruitment process.

The personal data may also be assigned to **public or private entities** as permitted by the local legislation applicable in each case.

By accepting this Privacy Policy, you expressly consent to and authorise the international transfers contained in this section.

Moreover, the purpose of the ACCIONA Group Employment Channel is to manage all offers of jobs and work experience and its entire recruitment process globally, as well as offering applicants a wider range of labour and work experience opportunities, therefore, if you have given your express consent, your personal data will be visible to **other ACCIONA Group companies**, and for their personnel, depending on your profile, and insofar as the same may be suitable for other available offers. These ACCIONA Group companies, which can consult this Privacy Policy at any time (*Who processes your data?* section) may also be located outside the European Economic Area. Access to and processing of this data by the personnel of different ACCIONA Group companies will be carried out in accordance with the applicable local legislation in force and will be able to use and store the data locally. Therefore, the consent for us to assess your application throughout the ACCIONA Group represents your consent to the possible transfer of information to countries other than your country of residence, which may have different data protection rules to those of your country. This notwithstanding, the ACCIONA Group and its corporate Personal Data Protection Policy establish a series of measures and principles that promote and oversee the adoption of organisational and technical means that ensure the privacy and security of the personal data processed.

FOR HOW LONG DO WE STORE THE PERSONAL DATA?

The personal data will be stored for the **duration of the selection process** for the labour, work experience or internal mobility vacancy for which you applied.

The data requested as a result of your status as **finalist**, will only be stored if you formalise the labour or work experience contract relationship, or enter the Acciona Academy Programme, and will be managed as part of the data processing of employees, being deleted from the Employment Channel in any event.

If you have given your consent to be considered for **other ACCIONA Group recruitment processes**, your personal data will be stored for as long as your user account on the platform remains active. The user account will expire if no log on is registered for a term of 24 months. You will receive a reminder email one month prior to the account expiry date.

WHAT RIGHTS DOES THE PROCESSING OF PERSONAL DATA INVOLVE?

If you have registered as an Applicant on the Employment Channel, you will be able to access your personal data at any time via your profile, as well as correcting and updating the same. You will be able to request erasure of the data in the *Delete my information* section. Applicants will also be able to withdraw consent for the processing of personal data, also in relation to processing in relation to other vacancies in the ACCIONA Group. You must take into account that once you have submitted an application, you will only be able to eliminate online access to your personal data, but not recover it from anyone who has had access to the same. ACCIONA Group warrants that it will adopt the security measures necessary to ensure confidential processing of data.

Applicants may, in the terms established in the regulations on data protection in force at any given time, and in accordance with the legislation in force, revoke the authorisation given for the processing and transfer of personal data at any time, as well as exercising the rights of access, correction, erasure, opposition, the right to request the limitation of data processing, the right of portability and the right to make a complaint to a supervisory authority by writing to the company responsible for the data processing and the vacancy, whose details appear in this document (*Who processes your data?* section), or via email sent to people.privacy@acciona.com. In either case, you must indicate the right you wish to exercise, as well as, if applicable, the email address used to register on the Employment Channel. If necessary, we may ask you for valid proof of identity.

IF YOU ARE IN THE EUROPEAN ECONOMIC AREA...

The current data protection regulations allow Applicants to exercise their rights of access, correction, opposition, erasure, limitation of processing, portability and the right not to be the subject of automated individual decisions, where applicable.

You can exercise these rights by writing to the company responsible for the data processing and the vacancy, whose details appear in this document (*Who processes your data?* section), or via email sent to people.privacy@acciona.com, mentioning the right you wish to exercise as well as, if applicable, the email address used to register on

the Employment Channel. In the event we consider it necessary to be able to identify you, we may ask for a copy of a document providing proof of identity. You are also entitled to withdraw the consent given at any time and make a complaint to the corresponding Supervisory Authority (http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm), and, in particular, the Spanish Data Protection Agency (www.aepd.es).

The ACCIONA Group will reply to the request within a maximum term of one month as of the receipt of the request. This term may be extended by two months if necessary, depending on the complexity and the number of requests.

MODIFICATION OF THE PRIVACY POLICY

The ACCIONA Group reserves the right to modify its Privacy Policy, according to its own judgement, or as a result of a doctrinal change by the Authority responsible for Data Protection, or due to legislative or case-law changes in the event that they represent a substantive change to the same. Any modification of the Privacy Policy will be published, prior to its effective application. Applicants are responsible for consulting it regularly as the use of the Employment Channel implies knowledge of the new Privacy Policy published.

ACCEPTANCE

This policy is made available to Applicants who state that they have read and understood it and, if applicable, agree to give their express consent. Version: 3 February 2020.