



PRIVACY POLICY APPLICABLE TO THE GENERAL SHAREHOLDERS' MEETING

The security of personal data has become one of the top priorities for organizations, and in a global and highly interconnected company such as ours, ensuring the inviolability of this information must be a priority objective. In this sense, we wish to be transparent and make this Privacy Policy available to everyone who interacts with us.

Through this Policy we wish to provide you with general and relevant information regarding our practices in Personal Data Protection, as well as our relationships with third parties who may process or collect personal data on our behalf.

ACCIONA, S.A. (hereinafter, "**ACCIONA**") undertakes to process personal data in accordance with personal data protection regulations and more specifically, whenever applicable, with the provisions of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in conformity with and with respect for the applicable local legislation in each case, meaning that in some jurisdictions this Policy could be supplemented by the corresponding local regulations.

This Privacy Policy is applicable to all shareholders and their representatives (hereinafter, "**Data Subject**" or "**Data Subjects**"). In this context, ACCIONA makes available to Data Subjects a series of means that allow them to interact with us, whether they involve registration, such as websites, platforms, mailboxes, addresses or telephone numbers for the provision of information or assistance to Data Subjects, forms, etc.

Some of our online channels may contain links to other non-ACCIONA third party websites and applications. This Privacy Policy does not apply to these. Please also review the privacy policies of such third parties to familiarize yourself with their practices. They may also contain cookies from third parties that are not owned or controlled by ACCIONA. In this case, you can choose your third-party cookie settings by using our Cookie Settings Tool, where you can manage your preferences, which you can access by clicking on "Cookies".

ACCIONA adopts the **technical and organisational measures** necessary to guarantee the security of personal data and to prevent the alteration, loss or unauthorised processing of or access to such data, taking into account the state of the art, the nature of the data and the risks to which the data are exposed. You may also confirm the presence of the SSL certificate by checking the Website's properties in your browser. A connection will be secure when "https://" appears in the browser's address bar instead of "http://" and a padlock symbol is displayed. You can look up more features of the SSL certificate in the Legal Notice section.

WHO IS THE DATA CONTROLLER IN CHARGE OF PROCESSING THE PERSONAL DATA?

We inform you that the Data Controller in charge of processing is:

- **Company name:** ACCIONA, S.A.
- **Tax ID:** A 08001851.

- **Address:** Avenida de Europa, 18, Parque Empresarial La Moraleja, 28108 de Alcobendas (Madrid).
- **Telephone:** +34 91 663 28 50
- **Contact e-mail address:** contact@acciona.es

WHAT DATA MAY WE PROCESS IN THE CONTEXT OF THE GENERAL SHAREHOLDERS' MEETING??

For the purposes of this Privacy Policy, "personal data" are data that identify a person or can be used to identify them.

ACCIONA hereby informs the Data Subjects that their personal data may only be collected for processing when they are **adequate, relevant, and not excessive** in relation to the specific, explicit, and legitimate scope and purposes for which they were obtained.

The personal data of shareholders and their representatives that are processed are identification and contact data, image, number of shares and electronic signature, as well as data provided by credit institutions and investment services companies in which the shareholders have their shares deposited or held in custody or which are obtained through the recording of the General Shareholders' Meeting. Data Subjects are also solely responsible for the information provided, and for the veracity and legality of the same.

- **Information from third parties**

Whenever Data Subjects provide us with data concerning third parties, either voluntarily or because we require such data to comply with any legal obligation, Data Subjects consent to the processing and declare that the data are accurate. Likewise, Data Subjects declare that they have informed the third parties of the content of the present policy and/or of the policy that applies to them and of which they have been specifically informed, and of the corresponding rights relating to the Protection of Personal Data that are enjoyed by them. Notwithstanding the foregoing, ACCIONA will use its best efforts to act appropriately in relation to the processing of the data of such third parties.

- **Public information**

ACCIONA may process information to which it may have access as information that is lawfully accessible to the public, and in particular, public information that is available in official registers. This processing will in any event only be done if there is a legal basis as set out in the applicable regulations and, whenever possible or where there is a contractual relationship, you will be informed.

- **Personal data of minors**

ACCIONA does not knowingly collect personal data from minors without the consent of their parents, guardians, or legal representatives. None of the channels made available to Data Subjects by ACCIONA are designed for or directed at minors.

If parents, guardians, or legal representatives believe that their minor children have provided personal information without their consent, please contact us by e-mail at protecciondedatos@acciona.com.

FOR WHAT PURPOSE AND LEGAL BASIS DOES ACCIONA PROCESS PERSONAL DATA?

ACCIONA processes the personal data of Data Subjects for the following legitimate purposes and on the following legal basis:

- Development, management, and control of the shareholder relationship

We process the data of Data Subjects for the purpose of managing, developing, and controlling the shareholder relationship, including the holding of the General Meeting and the management of the exercise of attendance, information, proxy and voting rights. The legal basis for the processing is the fulfilment of the existing contractual relationship.

- Recording and broadcasting the General Meeting

The proceedings (partial or complete) of the General Meeting may be the subject of audiovisual recording and public broadcast on www.acciona.com. In this respect, the General Meeting may be followed both in person and online. By attending the General Meeting, the attendee consents to the recording and broadcasting.

- Compliance with the legal obligations incumbent upon us

Whether these legal obligations are of a commercial, fiscal, accounting, or administrative nature, the legal basis authorizing us to carry out this processing is compliance with legal obligations.

HOW LONG DOES ACCIONA KEEP PERSONAL DATA?

The data shall be kept during the shareholding relationship and, once this has ended, during the period of limitation of any legal or contractual liabilities that may arise.

TO WHOM MAY ACCIONA DISCLOSE PERSONAL DATA?

At ACCIONA we undertake not to transfer or disclose our personal information except as described in this Privacy Policy:

- We may exchange personal information with service providers, who are either ACCIONA companies or third parties and are in some cases contracted to perform services on our behalf. In these cases, the corresponding data processor agreements are signed whenever necessary, as established by the regulations on matters relating to data protection.
- The personal data collected will also be disclosed to the notary who draws up the notarial act of the General Meeting; to the Companies Registry of Madrid, and to third parties in the exercise of the right to information provided for by law or which may be accessible to the general public insofar as they are included in the documentation available on the website or become apparent during the course of the General Meeting.

- ACCIONA is a global and interconnected company, hence we may exchange personal information within companies of the Group in the context of the centralization of certain activities carried out by them as a corporate Group. You can look up the corporate structure of ACCIONA at any time in the annual report containing the [most recent consolidated annual accounts](#). Nevertheless, this transfer, assignment, and processing of personal data within ACCIONA is carried out under the data protection laws in force and through the adoption and application of adequate guarantees designed to ensure the protection of Data Subjects' privacy and fundamental rights and freedoms. In the event of such a transfer, this will be indicated for the specific processing operation and will require Data Subjects' consent.

Likewise, ACCIONA would inform you that some of these service providers, third parties or Group companies may be located in territories outside the European Economic Area that do not provide a level of data protection comparable to that of the European Union. In such cases we transfer Data Subjects' data with appropriate safeguards, maintaining at all times the security of such data; these may include the formulation of Standard Contractual Clauses approved by the Commission, the content of which may be examined by clicking on the following link: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_es.

WHAT ARE DATA SUBJECTS' RIGHTS WHENEVER WE PROCESS THEIR DATA?

Data subjects may exercise their rights of access, rectification, erasure, portability of their data, and/or restriction or objection to its processing by writing to the Personal Data Protection Department, at Avenida de Europa, 18, Parque Empresarial La Moraleja, 28108 Alcobendas (Madrid) or by sending an e-mail to protecciondedatos@acciona.com. You may likewise, at any time, withdraw the consent given by writing to the above address, and filing a complaint with the relevant data protection Supervisory Authority (<https://www.agpd.es/portalwebAGPD/index-ides-idphp.ph>) and, in particular, with the Spanish Authority (www.aepd.es).

Observation: *During periods of an exceptional nature such as States of Alarm or Emergency, which imply periods of confinement, or other external disturbances such as natural disasters, extreme weather conditions or wars, rights which are exercised by ordinary mail rather than through the email account will have a longer response time than usual, with response times being re-established once the recommended confinement period has been lifted.*

FURTHER INFORMATION

At ACCIONA we use social networks such as LinkedIn, Twitter, Facebook, Google+, Instagram and YouTube to share our content. We act in such networks as the Data Controller in charge of the data published by us, always processing such data in accordance with the terms and conditions established for each one of the social networks.

Interaction with Data Subjects through the use of such profiles or tools may involve the international transfer of data of an analytical and technical nature in relation to the Site and the social network profiles, with the data provided by Data Subjects through such profiles being processed on the servers of the social network companies.

VALIDITY

Any changes to the Privacy Policy and information management practices will be reflected in a timely manner, and ACCIONA may add to, modify, or replace the Privacy Policy as it deems necessary.

Last updated: 4 May 2023.
