

PERSONAL DATA PROTECTION POLICY

The Board of Directors of Sacyr, S.A. ("Sacyr"), within the framework of its general and non delegable competence to determine the general policies and strategies of the Sacyr Group, and after review and proposal by the competent Committee, has approved this Personal Data Protection Policy (hereinafter, the "Policy"). This Policy is part of the "SACYR Group's Regulatory Compliance, Criminal Prevention and Antitrust Defence Model" (hereinafter, "Regulatory Compliance Model").

The "Sacyr Group Code of Ethics and Conduct" (hereinafter, "the Code of Ethics and Conduct") is the internal standard that forms the basis of this Regulatory Compliance Model. This Policy is aligned with the values of integrity (honesty and transparency) promulgated in the Code of Ethics and Conduct and constitutes a development of one of its guidelines for behaviour towards the Market: that relating to the protection of personal data.

Consequently, this Policy must be read and interpreted in conjunction with this Code of Ethics and Conduct and with the other policies of the Sacyr Group that develop it.

1. Purpose of the Policy

The objectives of this Policy are:

- To promulgate and strengthen the Group's commitment to respect for the fundamental rights and freedoms of individuals, including the right to the protection of personal data.
- To establish the fundamental principles and obligations imposed by the regulations on the protection of personal data on the companies and individuals that make up the Sacyr Group.
- To establish the guidelines to be followed by the Group to guarantee the privacy of the data of customers, suppliers, employees and, in general, of all the categories of data involved, identifying the most appropriate legal basis for the processing of personal data carried out in accordance with current legislation.

This Policy is complemented by the specific internal regulations that develop it and that are created according to the needs of each SACYR Group company in this area.

2. Scope of application

This Policy is applicable to all entities belonging to the Sacyr Group, taking into account their own characteristics. For the purposes of this document, the Sacyr Group is considered to be made up of (i) all the subsidiaries or majority-owned companies in which Sacyr, S.A. is directly or indirectly effectively controlled by Sacyr, S.A., regardless of their geographical location, (ii) as well as by the Sacyr Foundation. Therefore, all references in this Policy to the Sacyr Group shall include all the companies listed above and the Foundation: (iii) the members of the administrative bodies, directors and employees of all the companies of the Sacyr Group, regardless of the territory in which they are located, (iv) those third parties, natural and/or legal persons, related to the Sacyr Group, in those aspects of the Policy that are applicable to them.

Its scope of application does not include subsidiaries or minority investee companies over which Sacyr, S.A. does not exercise, either directly or indirectly, effective control, which will have, where appropriate, their own policies or internal regulations that regulate the matter, and in no case may these be contrary to the provisions of this Policy.

In the case of activities carried out by the Sacyr Group outside Spain, this Policy will be adapted to the most restrictive local legislation that may be applicable.

3. General principles regarding the protection of personal data

In order to achieve the implementation of this Policy, the actions of Sacyr and the other companies belonging to its Group in relation to personal data will be guided by the following principles:

- a) They will be processed in a lawful, proportional and transparent manner.
- b) They will be collected for specific purposes and will be limited to the purpose for which they were collected.
- c) They will be accurate and will always be kept up to date.
- d) The integrity, availability and confidentiality of the data stored will be guaranteed, applying appropriate security and risk mitigation measures.
- e) They shall be stored only for the time necessary for the purposes of the processing; after this time, they must be blocked and subsequently deleted.

f) Companies will have proactive responsibility, applying timely and effective measures from the source in relation to the data they process.

4. SACYR Group's commitments in terms of data protection

As reflected in the general principles of the Sacyr Group expressed in its Code of Ethics and Conduct, respect for legality, integrity, honesty, transparency and the fundamental rights of individuals, are basic ethical principles that must govern any action by its members who undertake to maintain at all times a behavior in accordance with the current regulations that are applicable and, specifically, a that relating to the protection of personal data.

The Sacyr Group, by express will of the Board of Directors of Sacyr, S.A., which formalizes it in this Policy, expressly expresses its position of absolute respect for the intimacy, privacy and integrity of individuals and its rejection of the violation of the principles relating to the protection of personal data included in the previous section. assuming the following commitments and obligations in the processing of personal data necessary to carry out its activity:

- a) Comply with applicable legal, regulatory or international agreement requirements, and align themselves with internationally recognized standards and good practices in the field.
- b) Supervise that neither the companies of the Sacyr Group nor their employees collect, process, store, preserve, communicate or use personal data in a way that contravenes the aforementioned regulations, respecting the legitimate rights of the owners of these data.
- c) Respect the right to privacy of individuals, protecting the personal data entrusted in particular by:
 - its employees, processing in the legally established terms, their personal data and in particular, medical or economic data.
 - third parties related to the Group such as customers, suppliers, partners or institutions and the general public.
- d) Establish protocols that demonstrate the application of privacy by design y by default.
- e) To design mechanisms for supervision and continuous improvement based on auditing and control of the correct compliance with data protection obligations.

To comply with these commitments and obligations, the Sacyr Group has adopted the following measures:

- a. Create an organizational structure responsible for ensuring data protection.
- b. Develop, based on the regulations relating to the protection of personal data, internal regulations on the matter adapted to the activity carried out by the Group.
- c. Inform, train and raise awareness among staff on the importance of complying with these regulations.
- d. Adapt the Group's existing policies and procedures to integrate the protection of personal data into the business processes of all areas, implementing technical and organisational measures that guarantee the security and confidentiality of the information processed by the Group in any area.

5. Privacy governance model in the Sacyr Group

The organisational structure for the protection of personal data that the Group has adopted is made up of the following bodies and managers:

- a) Data Protection Officer ("DPO") of the Sacyr Group: a figure who exercises, among others, the function of supervising compliance with regulations, informing and advising the Group on data protection matters, as well as serving as a point of contact with the competent Supervisory Authority. The communication channel with the Sacyr Group's DPO is: dpo@sacyr.com.
- b) SACYR Group's Security and Privacy Committee: committee chaired by the DPO and made up of staff from the personal data protection areas and the Information and Communications Technologies ("ICT") Division, whose task is to address the Group's privacy and security issues from an integrated and joint perspective.

This *Personal Data Protection Policy* was approved by the Board of Directors of Sacyr, S.A. on November 4, 2020 and last modified on May 8, 2023.