

PRIVACY POLICY OF NAVANTIA, S.A., S.M.E., SINGLE-MEMBER COMPANY, FOR PERSONNEL OUTSIDE ITS WORKFORCE

1. Identity of the data controller

NAVANTIA, S.A., S.M.E. Single-Member Company, of registered office at: Calle Velázquez 132, 28006 Madrid (hereinafter **NAVANTIA**), informs the **WORKERS OUTSIDE ITS WORKFORCE** (hereinafter, the **OUTSIDE WORKERS**) that the personal data gathered by their employer company and the data obtained during the time spent on **NAVANTIA** premises, will be processed in accordance with the terms set out in the Navantia Privacy Policy

2. Processing purpose

NAVANTIA will process the personal data of the **OUTSIDE WORKERS** for the purpose of being able to exercise its duties as lead employer and/or owner of the workplace. By way of example and without limitation, workers are hereby informed of the following uses derived from the above purposes:

- Monitoring of the fulfilment of obligations regarding employment and social aspects, Social Security, health monitoring, Occupational Risk Prevention and the Environment by the employer companies of the stated workers.
- Coordinating company Occupational Risk Prevention activities among different companies at the same workplace
- Producing activity reports and statistics
- Management of the internal security of the company
- Premises access control

3. Access control and video surveillance

All **OUTSIDE WORKERS** are likewise hereby informed of the implementation of a video surveillance system and premises access control system.

Cameras may capture images of the company's premises, buildings and sites. In any event, areas under video surveillance will always be marked by means of information panels. Recordings by our video surveillance system will take place on an ongoing basis, including during working hours. In any event, **NAVANTIA** guarantees confidentiality and respect for the privacy of those affected, as well as the security of the recorded images.

Recordings will be processed so as to comply with security procedures and to prevent risks affecting the safety and security of workers, facilities and property assets, and also, in accordance with current legislation, to report, where necessary, any event to the competent authorities, or to meet any requirements thereof.

Personal data collected as a result of video surveillance systems will be destroyed no later than one month from the date of its collection by **NAVANTIA**.

The legal basis for this processing, as set out under points 2 and 3, is the legitimate interest of the company in ensuring the safety of its facilities, as well as in monitoring compliance with contractual obligations.

4. Data recipients

The purposes and functions described in the above subsections may require the communication of their data to the following recipients:

- Company or organisation responsible for the **OUTSIDE WORKER** in handling the contractual relationship.
- Public authorities, the People's Ombudsman, the Department of Public Prosecution or Judges and Courts or the Court of Auditors, if so requested in performing the functions attributed to them.
- Mutual employment accident and professional illness insurers and external risk prevention or health monitoring services, to fulfil the employment obligations of **NAVANTIA**.
- And, in general, any communication of data authorised by law or required for the development, fulfilment and oversight of the legal relationship.

5. Third-party data provided by the OUTSIDE WORKER

In the event that the **OUTSIDE WORKER** provides personal data of third parties for any purpose, he/she guarantees that the data subjects have been informed in advance and their consent has been obtained for their data to be communicated to **NAVANTIA**.

6. Exercise of rights

OUTSIDE WORKERS may exercise their rights of access, rectification, cancellation/erasure, objection, restriction or portability by sending written communication to Calle Velázquez 132, 28006 Madrid or the e-mail address: comiteseguridadrgpd@navantia.es. Rights of cancellation/erasure or objection may not be exercised if the granting thereof prevents **NAVANTIA** from performing its duties as lead employer and/or owner of the workplace.

Likewise, if they believe their right to personal data protection has been violated, they may file a grievance with the Spanish Data Protection Agency (www.aepd.es).

7. Commitments of the OUTSIDE WORKER regarding data protection

The **OUTSIDE WORKER** undertakes to:

- Provide updated, precise and accurate information whenever so requested.
- Inform **NAVANTIA** of any modification that the information provided might undergo, by means of the procedure indicated to exercise the right of rectification.
- Comply with the duty of professional secrecy and the obligation to store personal data and confidential information accessed as a result of professional activity, said commitments remaining in place even after the termination of the relationship with **NAVANTIA**.
- Make no personal, leisure or unlawful use of any resources made available by **NAVANTIA** for the performance of his/her functions, bearing in mind that IT equipment, the Internet and corporate email are considered to be working tools within the organisation. All IT equipment and systems may be inspected and audited by **NAVANTIA** without prior notice or authorisation on the part of the **OUTSIDE WORKER** in order to verify compliance with the terms of this point.
- Access personal data for which the controller is **NAVANTIA** only where essential in order properly to perform the services for which he/she was contracted. And process the data in accordance with any instructions received from **NAVANTIA**.
- Immediately inform **NAVANTIA** should he/she detect that any of **NAVANTIA**'s instructions are in breach of the data protection regulations in force.
- Make no allocation, application or use of personal data for which **NAVANTIA** is the controller for any purpose other than service needs, or any other use that could constitute a breach of the instructions.

- Inform **NAVANTIA** at the earliest possible opportunity, and within a maximum of two (2) working days, of any request to exercise the right of access, rectification, erasure, objection, restriction of processing, portability of data, or the right not to be the object of automated individual decisions, issued by a data subject whose data have been processed by the **OUTSIDE WORKER** for the purpose of performance of his/her activities, in order to allow said request to be resolved by the deadlines established in the regulations in force.
- Support **NAVANTIA** in conducting data protection impact assessments and processing preliminary consultations with the Supervisory Authority, where applicable.
- If the **OUTSIDE WORKER** is required to transfer or permit access to personal data for which **NAVANTIA** is the controller by a third party in accordance with the applicable Laws of the EU or of the Member States, he/she must inform **NAVANTIA** of said legal demand in advance, unless prohibited from so doing for public interest reasons.
- Once the contractual relationship agreed between **NAVANTIA** and the **OUTSIDE WORKER** has been fulfilled or terminated, the **OUTSIDE WORKER** must request precise instructions from **NAVANTIA** as to the destination of the data, the latter being entitled to opt for return, transfer to another entity or complete destruction, provided that there is no legal provision in force that would require the storage of the data, in which case they may not be destroyed.
- Comply with the security and data protection regulations of the company, including functions and obligations regarding data protection. In the event of any queries as to said functions and obligations or the internal regulations of the company, information must be requested from the worker's line manager.
- If any possible leak of information or security breach is detected, the **OUTSIDE WORKER** must inform **NAVANTIA** thereof for the incident to be handled. This notification must be at the earliest possible opportunity, and in any event within a maximum of 72 hours, since **NAVANTIA** may be obliged to serve notice of the incident on the Spanish Data Protection Agency and the users affected thereby.
- Comply with all other functions and obligations regarding data protection as set out in the security policies in force at **NAVANTIA**. In the event of any queries as to said functions and obligations, information should be requested from the worker's line manager.

8. Security measures

NAVANTIA has adopted the technical and organisational measures required in order to guarantee the security of personal data and to prevent the alteration, loss, processing or unauthorised access thereof, taking into account the technological state of the art, the nature of the data stored and the risks to which they are exposed, whether derived from human action or from physical or natural influences.

9. Data storage

The data of **OUTSIDE WORKERS** will be processed for as long as the contractual relationship should exist, and in any event for a period of 5 years after the last permission to access **NAVANTIA** premises.

Following conclusion of the contractual relationship, their data will be transferred to the historical archive file, where they will be blocked and stored for the time required in order to fulfil the purpose for which they were gathered and to determine any possible liabilities that might result from said purpose and the processing of the data, and will be available to Public Authorities, Judges and Courts.