# DATA PROTECTION INFORMATION – ETHICS CHANNEL

Data controller:

Identity: NAVANTIA S.A., S.M.E. (Navantia) – NIF: A84076397

Mailing Address: C/Velázquez 132 – 28006, Madrid

Telephone: 913358400

E-mail: dpd@navantia.es

Data Protection Officer: dpd@navantia.es

Purpose of processing:

Purpose: The data collected will be processed in order to process and manage the communications that are submitted through the Ethics Channel. Navantia will process the personal data needed to guarantee the protection of people who report regulatory violations.

The identity of the whistle-blowers or people who make public disclosures will in any case be reserved and will not be communicated to the persons to whom the related facts refer or to third parties.

The internal information system is designed, established and managed securely, guaranteeing the confidentiality of the identity of the whistle-blower and any third parties mentioned in the communication, and the confidentiality of the actions that are carried out in the management and processing of the data, as well as the protection of data, preventing unauthorized access.

Conservation periods: Data will be kept as long as needed to decide on whether or not an investigation should be initiated into the facts reported. Under no circumstances will data be kept for longer than ten years.

Legal grounds:

The legal grounds for processing the supplied data are based on Article 6.1.c) of the GDPR: processing necessary for compliance with a legal obligation applicable to the data controller.

The legal grounds for processing as a result of a public disclosure are based on Article 6.1.e) of the GDPR: processing necessary for compliance with an action carried out in the public interest.

The processing of special categories of personal data for reasons of essential public interest is based on Article 9.2. g) of the GDPR: processing is necessary for reasons of essential public interest.

Recipients:

It is not expected to transfer any data, except in compliance with a legal obligation. It is not expected to transfer any data to third party countries or international organizations.

Rights:

The rights pertaining to data subjects are as follows:

- ☐ To obtain confirmation about whether Navantia is processing their personal data.

☐ To access their personal data, and to request rectification of any incorrect data, or request erasure thereof when, among other reasons, the data are not required for the purposes they were compiled.

☐ To request under certain circumstances:
- Restricted processing of their data, in which case they will only be kept by Navantia for exercising or defending against claims.
- Object to the processing of their data, in which case Navantia will stop processing their details, unless it is specifically required to for exercising or defending against claims. Including data processing for automated, individual decision-making.
  If the person to whom the facts related in the communication or to whom the public disclosure refers exercises the right of opposition, it is presumed, unless proven otherwise, that there are compelling legitimate grounds that legitimize the processing of their personal data.
- Portability of data so that they are provided to the data subject or another data controller, in a standard, structured manner suitable for machine reading.

Data subjects may exercise their rights before Navantia by writing to: C/Velázquez, 132, – 28006 Madrid, with the subject matter: Ref. Data Protection or by e-mail at: dpd@navantia.es.

The persons affected by a non-compliance with personal data protection rights, particularly if data subjects have not been able to satisfactorily exercise their rights, they may submit claims to the competent Data Protection Controlling Authority, which is the Spanish Data Protection Agency - Address: C/ Jorge Juan, 6 – 28001 MADRID (Madrid) – On-line service: sedeagpd.gob.es. Nevertheless, data subjects should initially submit claims to Navantia's Data Protection Officer: dpd@navantia.es.