

# PRIVACY POLICY

## General information

Pulice, belongs to Dragados Group and adheres to its Privacy policy, domiciled at 8660 E Hartford Drive, Suite 305 Scottsdale Arizona 85255 (USA), and telephone (+1) 602 944 2241, is committed to the protection of all personal data processed in the course of its business activities.

These data processing operations are adequate, justified, relevant and not excessive for the scope and purposes in question, and comply at all times with the applicable legislation in force: general federal & state legislation, and sector-specific legislation.

It is routine for us to collect, use, store, and process personal data about you when you interact with our website as well as the services owned, operated, and/or provided by Pulice that display or link to this Privacy Policy, including our offline locations. As such, “personal data” or “personal information” is information that identifies or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household.

As defined in California law, we do not “sell” or “share” your personal information.

There are different ways we may obtain personal information about you, including through (A) information you provide to us; (B) information we receive from third parties; and (C) combining information from different sources. This includes data that identifies you personally whether directly or indirectly.

### *The Purposes for Which We Collect and Use Your Personal Information*

The situations in which we will use your personal information include:

- To receive and handle resumes in the recruitment processes the user participates in;
- To ensure proper management of the ethical channel;
- To coordinate Compliance systems and internal legal advice;
- To defend our rights and interests;
- To detect offences and prevent any criminal liability being brought against Dragados; and
- To prevent any type of conduct contrary to the company's internal or external regulations.

### *Data Retention*

Contact data will be kept for as long as the relationship is maintained, and erasure thereof has not been requested. In any case, the data retention periods shall be established in accordance with the applicable legal statute of limitations. Data related to job applications will be kept for a maximum period of 5 years if erasure thereof has not been requested and always in compliance with the applicable legal limitation periods. If you wish to have your application erased, you can request it by email at the following email address: [privacy@dragados-usa.com](mailto:privacy@dragados-usa.com).

Dragados Group will keep a record of all complaints received on a confidential basis. Records shall not be kept for longer than necessary and shall be retained for as long as necessary to comply with any applicable legal requirements at any given time.

More specifically, Dragados Group will keep the personal data of the complainant for the time necessary to decide whether to initiate an investigation into the facts or conduct reported and, once decided, this data will be removed from the Ethics Channel, and may be processed outside the system to investigate the facts for the time necessary to reach a decision. Once the investigation of the report has been completed and any appropriate action has been taken, the data of those reports that have been processed shall be duly blocked in order to comply with the legal obligations that may apply in each case.

If the complaint is not acted upon, the information may be retained anonymously.

### a) Categories of Data Subjects

Dragados needs to process the personal data of different categories of data subjects and for different purposes. The main groups of people whose personal data are processed are:

- Employees.
- Company legal representatives.
- Beneficiaries covered by employee insurance policies.
- Ethical Channel users.
- Job applicants.

The personal data of each of these groups may be used in different ways and shared with different natural or legal persons, depending on the specific purpose for which they are to be used. Below is the basic information on the processing operations related to these groups of data subjects.

Under no circumstances will Dragados use personal data for automated decision-making.

### b) Security applied to data processing

In accordance with current applicable regulations, Dragados has implemented appropriate technical and organizational security measures aimed at guaranteeing integrity, availability and confidentiality of personal information, thereby taking into account the nature, scope, context and purposes of each of the processing operations we carry out. We also consider the probability of a risk occurring and the impact it would have on the persons whose personal data we handle, if such risk were to materialize, pursuant to the foregoing.

In general, but not exclusively, the following security measures have been adopted:

- Allocation of user permissions based on the functions they are to perform.
- Physical and logical access controls.
- Back-ups.
- Designation of a Data Protection Officer.
- Management and control of media containing personal information.
- Development of data protection policies and protocols.
- Encryption of sensitive information and biannual audits to reinforce data processing operations where the level of risk is the highest among all the data processing operations we carry out.

In addition, other verification processes are carried out periodically to help assess that the security measures implemented in each of the data processing operations (not only in those with the highest risk) are effective, and to ensure continuous improvement to guarantee data processing security, whilst taking into account advances in technology.

### c) Rights of data subjects

You may take advantage of the following privacy rights:

- **Right to know**

You may have the right to know what personal information we have collected about you, including the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you. Right to delete your personal information

You may have the right to request that we delete personal information that we have collected from you, subject to certain exceptions.

- **Right to correct inaccurate personal information**

You may have the right to correct inaccurate personal information that we may maintain about you, subject to appropriate information.

Please note that, where permitted under applicable California law, we may decline a request if we are unable to verify your identity (or an agent's authority to make the request) and confirm the personal information we maintain relates to you.

- **How to exercise your rights**

To exercise any of these rights, you may contact Pulice at postal address 8660 E Hartford Drive, Suite 305 Scottsdale Arizona 85255 (USA), by e-mail at [privacy@dragados-usa.com](mailto:privacy@dragados-usa.com), or by phone at +1 602 944 2241. We may take steps to verify your identity before responding to your request by asking you a series of questions about your previous interactions with us.

You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you've authorized them to act on your behalf. Pulice retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity.

We also inform you that if you consider there has been any type of infringement regarding the processing of your personal data, you have the right to file a complaint with the competent supervisory authority (in California, the California Privacy Protection Agency, <https://cppa.ca.gov/>, or a similar agency available in any other State).

**d) We value your privacy and will not discriminate in response to your exercise of your privacy rights.**

**Data Protection Officer**

For further information, or for any other question or concern regarding the processing of your data, please do not hesitate to contact our Data Protection Officer at:

Address: Dragados USA Data Protection Committee, 810 7th Ave, 9th floor New York 10019 (USA)

E-mail: [privacy@dragados-usa.com](mailto:privacy@dragados-usa.com)

## Data protection of the website and job applicants

Dragados does not use cookies to obtain information about users, nor does it register access IP addresses, and does not have any web page analytical tool enabled.

### a) Purpose

Data processing is limited to one of the following purposes:

- To deal with queries from users who contact us at the addresses provided and to send the information requested.
- Receive and handle resumes in the recruitment processes the user participates in.

### b) Legitimacy

By providing personal data through the forms provided on the website (Careers and "Join us") or by using the e-mail address provided and sending your contact details, the user expressly consents to Dragados being able to process such data under the terms of this Privacy and Data Protection Policy clause and for the purposes expressed.

### c) Data retention

Contact data will be kept for as long as the relationship is maintained, and erasure thereof has not been requested. In any case, the data retention periods shall be established in accordance with the applicable legal statute of limitations.

Data related to job applications will be kept for a maximum period of 5 years if erasure thereof has not been requested and always in compliance with the applicable legal limitation periods. If you wish to have your application erased, you can request it by email at the following email address: [privacy@dragados-usa.com](mailto:privacy@dragados-usa.com).

### d) Data recipients

No assignments or transfers of your data are envisaged, other than to companies belonging to Dragados Group, pursuant to the purposes specified in this Policy.

## Data protection of ethical channel users

### a) Purpose

Dragados uses your data to ensure proper management of the ethical channel, coordination of Compliance systems and internal legal advice as well as to defend our rights and interests, to detect offences and prevent any criminal liability being brought against Dragados and to prevent any type of conduct contrary to the company's internal or external regulations.

### b) Legitimacy

Data processing is based on the public interest consisting of creating and maintaining an information system for internal complaints and investigating possible irregularities or acts contrary to ethics, legality or corporate rules, on the legitimate interest of Dragados in preventing such conduct and in seeking to defend the legitimate rights and interests of Dragados, as well as on the legal obligation to resolve the complaints and queries made, and, where appropriate, for the filing, pursuit or defence of claims.

Processing of the personal data of the complainant, respondent or third parties is strictly necessary to manage the complaint and to comply with the aforementioned purposes and legal obligations. Under no circumstances will Dragados Group carry out automated decisions based on the data submitted.

### c) Data retention

Dragados Group will keep a record of all complaints received on a confidential basis. Records shall not be kept for longer than necessary and shall be retained for as long as necessary to comply with any applicable legal requirements at any given time.

More specifically, Dragados Group will keep the personal data of the complainant for the time necessary to decide whether to initiate an investigation into the facts or conduct reported and, once decided, this data will be removed from

the Ethics Channel, and may be processed outside the system to investigate the facts for the time necessary to reach a decision. Once the investigation of the report has been completed and any appropriate action has been taken, the data of those reports that have been processed shall be duly blocked in order to comply with the legal obligations that may apply in each case.

If the complaint is not acted upon, the information may be retained anonymously.

#### d) Data recipients

Personal data collected in the context of a complaint made through the complaint channels may be processed or communicated to the following parties where necessary:

- The service provider of the platform which manages the complaints channels;
- Dragados' Compliance Body;
- Authorised representatives of Dragados Group, where necessary;
- External advisor who may provide assistance in assessing the report, investigating the matter or advising Dragados Group on the issue at hand;
- Police or other regulatory or law enforcement authorities.

The data may also be submitted, together with the complaint made, to a division or subsidiary of ACS Group in the event that the facts reported affect them or should be investigated by them.

No international data transfers are envisaged, other than within Dragados Group.

Last updated: 22 January 2024