



## **Redeia Ethics and Compliance Channel Privacy Policy**

### **1. Enforcement of this Privacy Policy**

This document governs the Redeia Group (hereinafter, the “company”) Ethics and Compliance Channel Privacy Policy (hereinafter, the “Channel”).

The Ethics and Compliance Channel is the medium created by Redeia so that any conduct or act contrary to law or to the provisions of the Ethical and Conduct Code committed by a member of the Group or of its interest groups can be reported. The list of companies that make up the Redeia can be checked out on our website: [www.redeia.com](http://www.redeia.com).

Likewise, this Privacy Policy is complemented, where provisions are not included therein, by the general Privacy Policy on the Redeia website (<https://www.redeia.com/es/politica-de-privacidad>), according to requirements established in EU Law 2016/679, of 27 April 2016, on the protection of a natural person related to personal data processing and the free circulation of these data (GDPR) and Organic Law 3/2018, of 5 December, on Personal Data Protection and digital rights guarantees (LOPDGDD).

### **2. Guarantee of confidentiality and responsible use of the Ethics and Compliance Channel**

Redeia ensures absolute confidentiality both in information provided and personal data facilitated through the above-mentioned Channel.

It is your obligation to make responsible use of the Channel, therefore in no case shall you make any unfounded claims, or claims in bad faith. Such cases may lead to applicable legal and/or disciplinary action. In addition, any statements you make when reporting any other person shall be respectful and shall safeguard decorum and good customs. The Company shall not be liable for any derogatory comments you make against a third party.

Likewise, you shall ensure that personal data provided are truthful, accurate, complete and updated.

### **3. Data Controller**

Your data shall be processed by RED ELÉCTRICA CORPORACIÓN, S.A., with ID Tax Number (N.I.F) A-78003662, and/or companies that make up Redeia, depending on the recipient of



your request or the relationship you have with each of them. The companies that make up Redeia can be checked out at: <https://www.redeia.com/es/conocenos/el-grupo-red-electrica>.

Postal address for notifications: Paseo Conde de los Gaitanes nº 177, La Moraleja, 28109 Alcobendas (Madrid).

Redeia has named a data controller, who can be contacted at [dpd@ree.es](mailto:dpd@ree.es).

#### **4. What data is processed?**

Personal data that are the subject of processing shall consist of identification and contact data (first name, surname, pseudonyms, email addresses, telephone numbers, etc.), professional data (job position) and data related to any category that may be provided by means of reported facts or attached evidence.

#### **5. Purpose**

The main purpose of the data provided by users of the Ethics and Compliance Channel shall be to manage the processing and handling of queries related to the interpretation of ethic values, principles and behavioural guidelines of the Red Eléctric Group Code of Ethics and Conduct, or communications regarding breaches to this Code, the law, internal regulations and commitments made by the organisation, as well as any possible irregularity or breach related to financial, accounting or commercial malpractice.

Additionally, your personal data may be processed for the management and processing of suggestions for improvement with regard to the Code of Ethics and Conduct, or communications with regard to facts or queries made to other company bodies linked to the supervision of legal obligations and commitments made by the organisation.

#### **6. Legitimation for your data processing**

Communicated personal data shall be processed in accordance with the following legitimation conditions:

- In accordance with provisions of GDPR article 6.1.a), because you have granted your consent by filling in a form authorising the processing of your personal data for a specific purpose or for certain purposes. You can revoke this consent granted at any time through the means made available to you.
- In accordance with provisions of GDPR article 6.1.c), because it is the processing required for the fulfilment of a legal obligation applicable to the data controller.
- In accordance with provisions of GDPR article 6.1.f), because it is the processing required for the legitimate satisfaction of interests sought by the data controller.

## **7. Data conservation**

In accordance with the provisions of the applicable data protection law, the data of the person formulating the claim, query or suggestion, as well as individual third-party personal data that are the subject of communication, shall be conserved in Redeia Ethics and Compliance Channel system, solely for the time deemed necessary to decide on the provenance of initiating an investigation on the reported facts, and always for a maximum period of three (3) months from the moment it is communicated, unless the purpose of conservation is to provide evidence of the functioning of Redeia's penal and anti-blackmail system.

Notwithstanding the above, data may be processed for a superior period outside of the Channel itself, limiting their knowledge to persons with internal control and compliance functions in Redeia. In the event that the investigation process initiated by the company in light of the claimed facts leads to the need for appropriate legal action to be taken and/or gives rise to court proceedings, data may be stored for a necessary additional period until a conclusive court resolution has been achieved, in accordance with current legislation.

## **8. Recipients**

In accordance with applicable data protection regulations, and in accordance with the above, internal access to data is limited exclusively to the party responsible for implementing Red Eléctica Group's internal control and compliance functions.



However, you are informed that access by other persons, or even communication to third parties, shall be lawful, when it is deemed necessary, where appropriate, for the adoption of disciplinary measures or for the required processing of court proceedings. For example:

- Data provided may be communicated to court authorities, judges, attorneys, State Security Forces or Bodies or administrative authorities to whom, where appropriate, the result of the investigation is addressed, when so required by them or when the reported facts constitute a criminal offence.
- Data provided shall be processed and, where essential, ceded to interested third parties, such as collaborating entities, expert advisors participating in the investigation including lawyers, forensic experts and surveyors, who shall be bound to the same duty of confidentiality.
- Redeia companies that are available for consultation at: <https://www.redeia.com/es/conocenos/el-grupo-red-electrica>.

## **9. International data transfer**

Generally, data facilitated through Redeia Ethics and Compliance Channel shall not be subject to International Data Transfer.

Notwithstanding the above, due to the activity carried out by Redeia, it is possible that international data transfers may be effectuated to countries located outside the European Economic Area (EEA).

For cases where international data transfers are carried out to countries outside the European Economic Area (EEA) or to countries where an inadequate level of protection is provided, necessary measures shall be applied with appropriate guarantees by means of Contract Clauses that legitimise international transfer.

## **10. Interested party rights**

Any person has the right to obtain confirmation whether personal data that concern them are being processed and, in such cases, has the right of access to their personal data, to their processing purposes, and to the personal data categories being processed.



Similarly, they shall have the right to request the rectification of inaccurate data or, where appropriate, to request their deletion when data are no longer necessary for the purposes for which they were collected; if consent on which the processing is based is withdrawn or processing is opposed; if personal data have been processed unlawfully; or they are to be deleted in order to comply with an established legal obligation in European Union or member State law.

They may request the limitation of their data processing when they refute the accuracy of personal data during the period in which the data controller is allowed to verify their exactness; processing is unlawful and the interested party opposes the deletion of the personal data and instead requests the limitation of their use; the data controller no longer needs the personal data for processing purposes, but the interested party needs them for the formulation, exercising and the defence of claims, or the interested party has opposed processing, while verification is made as to whether the controller's legitimate reasons prevail over those of the interested party. In such cases, we shall only conserve data for the exercising or defence of claims.

Under certain circumstances and for reasons related to your personal situation, you can oppose your data processing. Redeia's data controller shall stop processing your data, except for imperative legal reasons, or the exercise or defence of possible claims.

You shall have the right to receive personal data that are of your concern, and you have facilitated, in a structured format, and to transmit them to another data controller without the controller to whom you had facilitated them being able to prevent it, when consent for processing has been granted; or processing is performed through automated means.

When affected persons exercise their rights to access, rectification, deletion, opposition, process limitation and portability of their data and not be the subject of individual automated decisions, they shall communicate their decision by email to: [digame@ree.es](mailto:digame@ree.es).

If you consider that your personal data have not been processed in accordance with the law, you can contact Redeia's Data Controller at the following email address: [dpd@ree.es](mailto:dpd@ree.es). You may also present a claim to Spanish Data Protection Agency, especially when you have not obtained satisfaction from the exercising of your rights, through the electronic office at [www.aepd.es](http://www.aepd.es).

## **11. How is your data security guaranteed?**

Redeia applies and maintains appropriate technical and organisational measures in order to ensure an adequate security level with based on the prior implementation of risk analysis.



Specifically, the company has established all the technical measures it has at its disposal to prevent the loss, misuse, alteration, unauthorised access and theft of data you facilitate to us.

*Date of this Privacy Policy update: 10 February 2021.*