

#### DATA PROTECTION

This is the data protection policy of **Grup Fusté Cassà**, **SL**, which is made up of the following companies:

- ✓ Construccions Fusté, SA
- ✓ Formigons Cassà, SLU
- ✓ Prefabricats Vibrats, SA
- ✓ Fusté Inversions, SL

For the purposes of this document, this group of companies is identified by the name of Grup Fusté. It refers to the data that it processes in the exercise of its productive, construction, distribution and commercial activities, in compliance with the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016).

### Who is responsible for the processing of personal data?

The person in charge of the Treatment of personal data is in each case the company of the group with which the client or supplier is related. Each company responds to its customers and suppliers for compliance with data protection regulations and guarantees their rights.

## For what purpose do we process the data?

We process personal data for the following purposes.

#### Contact.

Respond to queries from people who contact us through contact forms on our web pages. We use them solely for this purpose.

### Telephone attention.

Respond by telephone to people who contact us in this way. In order to offer a better quality of service, conversations can be recorded, previously notifying the person with whom we communicate.

#### Staff pick.

Reception of CVs sent to us by people interested in working with us and management of personal data generated by participation in personnel selection processes, in order to analyze the adequacy of the candidate profile based on the positions vacancies or newly created. Our criteria is to keep for a maximum period of one year also the data of the people who do not end up being hired, in case a new vacancy or new job position occurs in the short term. However, in the latter case, we immediately delete the data if the person concerned asks us to.



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#### Services to clients.

Register new customers and additional data that may be generated as a result of the business relationship with customers. In the contracting process, essential data is requested, including bank details (current account number or credit card number) that will be communicated to banking entities that manage the collection (they can only use them for that purpose). The commercial and service provision relationship involves other treatments, such as incorporating the data into accounting, billing or information to the tax administration.

### Information about our products and services.

While there is a relationship with its clients, Grup Fusté uses their contact information to communicate information related to this relationship, information that may circumstantially include references to our products, our works and services, whether of a general nature or referring more specifically to the characteristics and customer needs.

### Other information on products and services.

Other information on products and services. With the explicit authorization of the clients, once the contractual relationship is over, the contact details are kept to send publicity related to our services, information of a general or specific nature based on the characteristics of the client. This information is sent to those who, despite not having been a customer, request or accept it by filling out our forms.

### Advertising of the products and services of companies in our group.

Always with the prior and explicit authorization of the persons indicated in the previous section, the contact details are used to deliver publicity, both of a general nature and adapted to the characteristics of the person, of the products and services of the companies in our group. Likewise, with the explicit consent of the person concerned, contact details may be communicated to these companies so that these companies can directly send advertising for their products or services.

#### Data management of our suppliers.

We register and process the data of the suppliers from whom we obtain products and services. They can be the data of people who act as freelancers and also data of representatives of legal entities. We obtain the essential data to maintain the commercial relationship, we use it solely for this purpose and we make our own use of this kind of relationship.

#### Video surveillance.

When accessing our facilities, the existence of video surveillance cameras is reported, where appropriate, through the approved signs. The cameras record images only of the points where it is justified to guarantee the safety of goods and people and the images are used solely for this purpose.



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#### Users of our website.

The navigation system and software that enables the operation of our websites collect the data that is ordinarily generated in the use of Internet protocols. In this category of data there is, among others, the IP address or domain name of the computer used by the person who connects to the website. This information is not associated with specific users and is used for the exclusive purpose of obtaining statistical information on the use of the website. Our website uses cookies (cookies) that allow the identification of specific natural persons, users of the site. You can read more information about the use of cookies from this link.

### Other channels for obtaining data.

We also obtain data through face-to-face relationships and other channels such as receiving emails. In all cases, the data is used only for the explicit purposes that justify the collection and treatment.

### What is the legal legitimacy for data processing?

The data processing that we carry out has different legal grounds, depending on the nature of each processing.

In compliance with a pre-contractual relationship. Case of the data of possible clients or suppliers with whom we have relations prior to the formalization of a contractual relationship, such as the preparation or study of budgets). This is also the case of data processing of people who have sent us their curriculum vitae or who participate in selection processes.

In compliance with a contractual relationship. Case of relationships with our customers and suppliers and all actions and uses that these relationships entail.

In compliance with legal obligations. Data communications to the tax administration is established by regulations governing commercial relations. The case of having to communicate data to judicial bodies or to security forces and bodies may also occur in compliance with legal regulations that require collaboration with these public bodies.

Based on consent. When sending information about our products and services, we process the contact details of the recipients with their authorization or explicit consent. The browsing data that we can obtain through cookies is obtained with the consent of the person who visits our website, consent that can be revoked at any time by uninstalling these cookies. It is also with the prior consent of each person that we communicate their data to other companies in our group.

For legitimate interest. The images that we obtain with the video surveillance cameras are treated for the legitimate interest of our company in preserving its assets and facilities. Our legitimate interest also justifies the processing of data that we obtain from the contact forms.



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#### To whom are the data communicated?

As a general criterion, we only communicate data to administrations or public powers and always in compliance with legal obligations.

In the issuance of invoices to clients, the data can be communicated to banking entities. On the other hand, if consent has been given, the data may be communicated to other companies in our group for the purposes indicated above. No data transfers are made outside the European Union (international transfer).

In another sense, for certain tasks we obtain the products and services of companies or people who provide us with their experience and expertise. On some occasions these external companies must access personal data that is our responsibility. It is not exactly a transfer of data, but a processing order. Services are only contracted from companies that guarantee compliance with data protection regulations. At the time of contracting, their confidentiality obligations are formalized and their performance is monitored. This may be the case of data hosting services, computer support services or legal, accounting or tax advice.

# How long do we keep the data?

We comply with the legal obligation to limit the data retention period to the maximum. For this reason, they are kept only for the time necessary and justified by the purpose for which they were obtained. In certain cases, such as the data that appears in the accounting documentation and billing, the tax regulations oblige to keep them until the responsibilities in this matter prescribe. In the case of data that is processed based on the consent of the person concerned, they are kept until that person does not revoke that consent. The images obtained by the video surveillance cameras are kept for a maximum of one month, although in the event of incidents that justify it, they will be kept for the necessary time to facilitate the actions of the security forces and bodies or judicial bodies.

### What rights do people have in relation to the data we process?

As provided in the General Data Protection Regulation, the people whose data we process have the following rights:

To know if it is. Anyone has, first of all, the right to know if we process their data, regardless of whether there has been a prior relationship.

To be informed at the collection. When the personal data is obtained from the interested party, at the time of providing them, they will have clear information on the purposes for which they will be used, who will be responsible for the treatment and the rest of the aspects derived from it. treatment.

**To access**. Very broad right that includes knowing precisely what personal data is processed, what is the purpose for which it is processed, the communications to other



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people that will be made (if applicable) or the right to obtain it. copy or know the expected period of conservation.

**To request its rectification.** It is the right to have inaccurate data that is processed by us rectified.

**To ask for its deletion.** In certain circumstances there is the right to request the deletion of the data when, among other reasons, they are no longer necessary for the purposes for which they were collected and justified their treatment.

**Request the limitation of treatment.** Also in certain circumstances the right to request the limitation of data processing is recognized. In this case, they will cease to be processed and will only be kept for the exercise or defense of claims, in accordance with the General Data Protection Regulations.

On portability. In the cases provided for in the regulations, the right to obtain one's own personal data in a commonly used structured format that is machine-readable is recognized, and to transmit it to another data controller if the person concerned so decides.

**To oppose the treatment.** A person can adduce reasons related to his or her particular situation, reasons that will lead to their data not being processed to the degree or extent that may cause them harm, except for legitimate reasons or the exercise or defense of claims.

Not to receive commercial information. We will immediately respond to requests not to continue sending commercial information to people who have previously authorized it.

# How to exercise or defend rights?

The rights that we have just listed can be exercised by directing a written request to Grup Fusté or by sending an email to fustegrup@grupfuste.com, indicating in all cases "Personal data protection".

If a satisfactory response has not been obtained in the exercise of rights, it is possible to file a claim with the Spanish Agency for Data Protection, through the forms or other channels accessible from its page <a href="www.agpd.es">www.agpd.es</a>.

The Direction,

