

DATA PROTECTION AND PRIVACY POLICY

1.- INTRODUCTION

GRUP VOLTES formed by VOLTES SLU (B25237975) CORPVOLTES SL (B25474090), VOLTES CONNECTA S.L.U (B22583881), SIMVOL 4 S.L.U (B25384009) and VOLTRANSCO S.L.U (B25467812), is committed to ensuring that your personal information is protected and not used improperly.

In this document, we explain who is responsible for the processing, for what purpose your personal information will be processed, the legitimacy for the processing, how we collect it, why we collect it, how we use it, the rights you have, and also the processes we have put in place to protect your privacy.

By providing us with your personal information and using our website, we understand that you have read and understood the terms related to the protection of personal data that are exposed

GRUP VOLTES assumes the responsibility of complying with current legislation on data protection, and aims to process your data in a lawful, fair, and transparent manner.

The applicable regulations are as follows:

- RGD: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.
- LOPDGDD: Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights.
- LSSI-CE: Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce.

2.- SCOPE OF APPLICATION

This document shall apply to all processing of personal data, whether manual or automated, carried out through this website or other devices and forms, owned by GRUP VOLTES.

3.- WHO IS RESPONSIBLE FOR THE PROCESSING?

The definition of Data Controller is described in the RGD, and it is as follows: "«Controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing.

In other words, GRUP VOLTES is responsible for the processing of your personal data. This means that we have determined the objectives or purposes and established the necessary means in the processing to protect your personal data.

- Business name: VOLTES SLU
- Registered address: Avda de la Pau, number 2, 25670 Tèrmens (Lleida)
- Email: protecciodades@voltes.com
- Telephone: 973180086
- Tax identification number: B-25237975
- Company Register: Registered in Volum 27, Folio 167, Sheet L-481

- Website: www.voltes.com
- Tax Identification Number: B25237975

If you have any queries, comments or concerns, or if you would like to make any suggestions about how we use personal information, you can email the Data Protection Officer of GRUP VOLTES at the email address protecciodades@voltes.com

4.- FOR WHAT PURPOSE DO WE COLLECT YOUR PERSONAL INFORMATION?

The main reason we collect your personal information is to facilitate and improve the service that you, as a customer and/or user, expect from us.

We collect your personal information to manage the services for which you have contacted us or to communicate in relation to the services we offer and/or requests you make to us, whether through our website or applications, over the phone, or in any paper form.

5.- TYPES OF TREATMENTS

Below, we include the different types of treatment that have been identified in GRUPO VOLTES

1. Customers:

- a. Purpose of the processing: to establish and execute the legal relationship with the client regarding the contracted services or products, compliance with legal entities, accounting, tax, and all related to the established legal relationship, answering their doubts or for the management, control, administration, extension, execution, and improvement of the relationship.
- b. Advertising purpose: the data will be processed for advertising purposes to send you advertising through any means, including email, SMS, EMS, MMS, fax or equivalent methods, of the products and/or services of the responsible party related to advertising of the works and services offered by the company.

Users are informed that no profiles will be created with their personal data and no automated decisions will be made.

- c. Legitimization of the processing: the execution of a contract and the consent or legitimate interest of the controller.
- d. Data collected: name, last name, ID card, professional contact address, email address, tax identification number.

2. Potential customers:

- a. Purpose of the treatment: to respond to your inquiries or questions derived from your contact with the data controller.
- b. Advertising purpose: the data will be processed for advertising purposes to send you advertisements by any means, including email, SMS, EMS, MMS, fax, or equivalent methods, of the products and/or services of the controller related to advertising of the works and services

offered by the company. Users are informed that no profiles will be made with their personal data and no automated decisions are made

- c. Legitimation of processing: the execution of a contract and the consent or legitimate interest of the controller.
- d. Data collected: name, last name, ID number, professional contact address, email, tax identification number.
- e. Recipients: As a general rule, the controller will not transfer personal data to third parties, unless there is a legal obligation or explicit consent from the data subject.

To be specific, personal data may be shared with:

- Public Administrations, Judges and Courts for compliance with legal obligations to which the data controller is subject due to its activities.
- Financial entities for compliance with obligations arising from the contract between the data controller and the data subject.
- Third parties whenever necessary for the development, fulfillment, execution, and monitoring of the contract between the data controller and the data subject.
- Data processors, access to which will in no case imply a transfer of data, when it is necessary to access personal data for the provision of services that the data controller has contracted with these processors, and with whom a data processing agreement has been signed.

3. Contacts through the web form

- a. Purpose of the treatment: addressing user inquiries and contact requests received through the website, managing the requested service, and providing a response.
- b. Legal basis for the treatment: user consent given to the data controller by checking the corresponding box with a single click.
- c. Data collected: name, phone number, email address, inquiry, IP address, operating system, and duration of the visit.

4. Access Control

- a. Purpose of the treatment: to control access and manage internal security of the facilities operated by the controller through the provided data for access control to the controller's buildings.
- b. Legal basis for the treatment: legitimate interest to guarantee the security of individuals, assets, and facilities by the data controller, which justifies the treatment of data through access control.

- c. Collected data: name, last name, phone number, and ID.

5. Newsletter

- a. Purpose of the treatment: sending information, news, reminders, and promotions that may be of interest, related to the activities of the data controller.
- b. Legitimation of the treatment: obtaining the consent of the interested party.
- c. Data collected: name, surname, email address.

6. Suppliers

- a) Purpose of the treatment: to establish and execute the legal relationship related to the services or products contracted with the provider, compliance with legal, accounting, tax and all related obligations, to answer your questions, and for the management, control, administration, extension, execution and improvement of the relationship.
- b) Advertising purpose: the data will be processed for advertising purposes to send you advertising by any means, including email, SMS, EMS, MMS, fax or equivalent means, of the products and/or services of the responsible party related to advertising of the company's works and services. Users are informed that profiles will not be created with their personal data and no automated decisions will be made.
- c) Legitimacy of the treatment: execution of a contract and consent, for the purposes of processing for advertising purposes.
- d) Data collected: name, surname, ID number, professional contact address, email address, tax identification number.

7. Social media

- a. Purpose of processing: registration and monitoring of the responsible party's corporate social media accounts.
- b. Legal basis for processing: consent given by the user when registering on the social media platform.

- c. Collected data: personal data provided by the user when becoming a follower of the social media accounts, such as name, surname, ID number, contact address, home address, email address, and contact phone number.

8. Human Resources

- a. Purpose of the treatment: management of the employment relationship with employees.
- b. Legitimacy of the treatment: execution of a contract.
- c. Data collected: name, ID number, social security number, address, email, telephone/mobile, marital status, date and place of birth, age, gender, nationality, bank account, profession, experience, education and skills.

9. Video surveillance

- a. Purpose of the treatment: to ensure the safety of individuals, goods, and facilities, compliance with emergency plans, and use of video surveillance as a means of corporate control both for access and for the presence of workers in the workplace, as well as to verify the fulfillment of their job obligations and duties.
- b. Legitimacy of the treatment: legitimate interest.
- c. Data collected: images.

10. Communication and reporting channel

- a. Purpose of processing: Investigation of reported incidents or received communications.
- b. Legal basis for processing: Compliance with the legal obligation to manage the procedure referred to in Article 9 of Law 2/2023 of February 20, regulating the protection of individuals who report regulatory violations and fight against corruption.
- c. Data collected: name, surname, phone number, email address.

6.- ORIGIN OF THE DATA

We collect personal information about you through different channels. In some cases, you will contact us to share your personal information (for example, by sending an email), and in other cases, we collect your personal data using other means.

We collect personal information that you provide to us through the GRUPO VOLTES website, email, mobile phone, when you hire a service, when you fill out a form, or others. In any case, at the time of collection, you will be informed of the data controller, the purpose of the processing, the recipients of the information, and how to exercise the rights granted to you by current data protection legislation.

For example: it is likely that you provide us with information when you contact our customer service, place an order, register on our website, update your preferences and account information, fill out a questionnaire/form, etc.

Generally, the information you provide us with includes identifying and financial data, such as: name and surname, address, ID number, date of birth, email address, contact phone number, and payment details

In specific cases, and depending on the purpose and intended use of the data, personal, academic, and professional characteristics, employment details, commercial information, social, economic, and insurance circumstances, and transfers of goods and services may also be collected.

For this reason, you commit to ensuring that the data provided to the data controller is current, real, and true, and therefore, to notify the controller of any updates or changes to this information.

If you communicate personal data of a third party, you commit to inform them in advance in accordance with articles 13 and 14 of the GDPR, to obtain their prior and express written consent, and to process the data for the purposes authorized by the third party

Therefore, you are solely responsible for any damages or harm caused to the data controller or third parties due to the processing of personal data of a third party, or your own personal data if it is false, incorrect, outdated, inadequate, excessive, or irrelevant.

Finally, we inform you that our website does not use cookies, neither our own nor third-party cookies.

7.- WHO ARE YOUR DATA COMMUNICATED TO?

Your data will not be generally communicated, therefore the data controller will not transfer personal data to third parties unless there is a legal obligation or we have the express consent of the data subject.

Specifically, personal data may be transferred to:

- a. Public administrations, courts and tribunals for the fulfillment of the legal obligations to which the data controller is subject due to their activity.
- b. Financial entities for the fulfillment of the obligations derived from the contract between the data controller and the data subject.

- c. Third parties in all cases where it is necessary for the development, fulfillment, execution, and monitoring of the contract between the data controller and the data subject.
- d. Data processors, whose access will never involve a transfer of data, when it is necessary to access your personal data for the provision of services that the data controller has contracted with these processors, and with whom we have signed a data processing agreement.

8.- HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?

We only store your personal information for as long as we need it in order to use it for the purpose for which it was collected, and according to the legal basis for processing it in accordance with applicable law.

Once the relationship is finished, the information will be kept blocked, without any use, for the legally established periods that are necessary for the formulation, exercise or defence of possible claims and will subsequently be deleted, unless there is a cause for preservation.

9.- HOW CAN YOU EXERCISE YOUR RIGHTS?

The data protection regulations allow the interested party to exercise their rights of access, rectification, opposition, erasure, limitation of processing, portability, not to be subject to profiling or individualized decisions and to revoke the consent given without retroactive effects.

For this reason, we inform you that you can exercise your rights free of charge, by email to protecciodades@voltes.com, attaching a copy of your ID card or equivalent supporting document.

The rights you can exercise are:

- **Access**: Consultation of the personal data held by GRUP VOLTES.
- **Rectification**: Modification of your data if they have changed or if they are inaccurate or incomplete.
- **Deletion**: Request to delete your data.
- **Opposition**: Request that your data not be processed.
- **Restriction of processing**: Request that the processing of your data be restricted while:
 - The accuracy is verified.
 - Unlawful processing exists, but data deletion is not desired.
 - GRUP VOLTES does need your data, but you wish to keep it for the exercise of your defence or claim.
 - Once the right to object is requested, it is being verified if this right prevails over a public or legitimate interest affecting the data subject to objection until the conflict is resolved.
- **Portability**: Power to receive the data provided by you in electronic format and those obtained during the contractual relationship with GRUPO VOLTES, as well as its transformation to another organization.

- Revocation of consent: Request to revoke the consent granted.

10.- HOW CAN I MAKE A CLAIM?

If you consider that, for any reason, GRUPO VOLTES has not processed your data correctly in accordance with current regulations, you can contact the Data Protection Officer by email protecciodades@voltes.com who will attend to and process your complaint with the utmost diligence. You may also, if you consider it appropriate, file a complaint by contacting the Spanish Data Protection Agency (C/ Jorge Juan, nº6, 28001 – Madrid).

11.- MINORS

The contents of this website are intended for people over 18 years of age, so that those under 18 years of age may not access or provide us with personal data.

12.- MODIFICATIONS TO THIS DATA PROTECTION INFORMATION

GRUPO VOLTES may review and update the data protection information in accordance with the applicable legislation, new jurisprudence or business practice, publishing the modification thereof on this website.

Date of last update: December 2023.