

# 7<sup>th</sup> Edition of the FCC Safety, Health and Well-being Awards

## LIVE HEALTHY AWARDS

### Personal Data Protection

In compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data ("GDPR"), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights ("LOPDGDD"), and Organic Law 1/1982 of 5 May on the civil protection of the right to honour, personal and family privacy and one's own image, Fomento de Construcciones y Contratas, S.A. ("FCC"), with registered office at Calle Federico Salmón, 13, 28016 Madrid (Spain), acting as Data Controller, hereby informs you as follows:

**Purposes of Processing:** The personal data provided for participation in the VII Edition of the FCC Safety, Health and Well-being Awards ("Live Healthy Awards") will be processed for the following purposes:

- Managing the receipt, validation, assessment and monitoring of applications.
- Contacting participants or contact persons whenever necessary.
- Organising the jury's decision process, the awards ceremony and related administrative activities.
- Recording participation and, where applicable, winner status.
- Promoting the Live Healthy Awards, their results and winning entries, in accordance with the relevant authorisations.
- Creating a historical and documentary archive of the Live Healthy Awards editions for corporate memory purposes and to demonstrate good practices in health, safety and well-being.
- Producing promotional, advertising or corporate communication materials for FCC and the FCC Group, including the incorporation of videos, images or testimonials from participants in internal or external campaigns.

**Categories of Data Processed:** Identification and contact details, professional data, position, professional profile, information included in the application, photographs, image, voice and audiovisual materials (including videos, recordings, testimonials and any multimedia content provided or generated in connection with participation in the Awards).

**Data Relating to Minors:** If minors appear in any audiovisual materials submitted, prior, explicit and written authorisation from their parents, guardians or legal representatives must be obtained. Such authorisation may be requested at any time. FCC reserves the right to exclude any material containing images of minors where proper authorisation cannot be demonstrated.

**Data Recipients:** Personal data may be disclosed to: (i) members of the Evaluation Committee or jury; (ii) FCC departments and FCC Group companies involved in organising, evaluating, promoting or presenting the Awards; (iii) external service providers required for the management of the Awards (acting as data processors under the safeguards established by Article 28 GDPR); (iv) media organisations, press and digital platforms for the dissemination of the Awards and their results; (v) FCC and FCC Group corporate social media channels (LinkedIn, X/Twitter, YouTube, Instagram, etc.); and (vi) sponsors or collaborators of the Awards, where expressly authorised.

Should an application be awarded, the applicant's identification and professional data, image and related content may be published through the corporate channels and media specified in these Rules. For detailed information on recipients, please contact [protecciondedatos@fcc.es](mailto:protecciondedatos@fcc.es).

**International Data Transfers:** No transfers of personal data outside the European Economic Area are currently envisaged. Should such transfers become necessary, FCC will implement the safeguards required under applicable legislation and will inform you in advance.

**Legal Basis for Processing:** The processing of personal data is based on the following legal grounds, depending on the relevant purpose:

- Management of participation and evaluation of applications: data subject's consent (Article 6(1)(a) GDPR).
- Dissemination of image, voice and audiovisual materials: explicit consent of the data subject (Article 6(1)(a) GDPR).
- Promotional and advertising use: explicit consent of the data subject (Article 6(1)(a) GDPR). FCC may use videos, images and testimonials of participants in promotional, advertising or corporate communication materials, whether internal or external, provided that the participant has granted consent.
- Organisation, internal management and corporate promotion of the Awards: FCC's legitimate interest (Article 6(1)(f) GDPR), provided that this does not override the rights and freedoms of the data subject.
- Historical and documentary archive: FCC's legitimate interest (Article 6(1)(f) GDPR) in maintaining a historical record of the Awards for corporate memory and recognition of good practices.
- Compliance with legal obligations: where applicable (Article 6(1)(c) GDPR).

**Authorisation for the Use of Image and Assignment of Rights:** By accepting these Rules, the participant expressly authorises FCC, in accordance with Organic Law 1/1982 of 5 May, to capture, reproduce, distribute and publicly communicate their image, voice and identifying data, on an exclusive basis and without financial compensation, as a consequence of their participation in the Live Healthy Awards.

Participation in the Awards and the authorisations and consents referred to in this section are entirely voluntary. Refusal to grant them, or subsequent withdrawal of consent, shall not result in any disadvantage or negative consequence for the employee, nor affect their employment relationship with FCC.

**Scope of the Authorisation:** This authorisation includes, but is not limited to:

- Publication through websites, intranet platforms, corporate social networks, magazines, newspapers, digital media and any other communication channels.
- Inclusion in promotional, advertising, informational or corporate communication materials of FCC and the FCC Group, both internal and external.
- Editing, adaptation, transformation or incorporation into photographic or audiovisual compositions together with other images, text or graphic elements.
- Transfer to third parties (media organisations, sponsors, collaborators) for the purposes described in these Rules.
- The authorisation is granted worldwide and for an indefinite period unless expressly revoked, without prejudice to the participant's right to withdraw consent at any time in accordance with the section "Withdrawal of Consent".

**Assignment of Intellectual Property Rights:** By submitting an application, the participant assigns to FCC, on an exclusive basis and without remuneration, the exploitation rights (reproduction, distribution, public communication and transformation) over audiovisual, photographic, documentary and any other original materials submitted with the application, in accordance with Royal Legislative Decree 1/1996 of 12 April approving the consolidated text of the Spanish Intellectual Property Law. This assignment is granted worldwide, for the maximum period permitted by law and for the purposes provided for in these Rules. The participant guarantees ownership of the assigned rights or possession of the necessary authorisations from the respective rights holders and undertakes to indemnify and hold FCC harmless against any third-party claims relating to infringement of intellectual property rights.

**Withdrawal of Consent:** You may withdraw your consent for the use of your image at any time. However, withdrawal shall not prevent the completion of actions or campaigns already underway and committed to before the withdrawal. Once consent has been withdrawn, FCC will assess, whenever technically feasible and reasonable, the removal or limitation of the use of images in future communications.

**Retention Periods:** Personal data will be retained for the following periods, depending on the processing purpose:

- Applications management: for the time necessary to manage the Live Healthy Awards and, as a general rule, for one (1) year following completion of the relevant edition.
- Audiovisual materials and images: until authorisation is withdrawn, without prejudice to the retention of lawfully published materials for historical archive or corporate memory purposes.
- Historical and documentary archive: in accordance with FCC's corporate archive retention periods, subject to periodic review, for documenting the history of the Awards and FCC's corporate memory.
- Legal liabilities: data may be retained for longer periods where necessary to respond to legal obligations, claims or requests from competent authorities.

Materials lawfully disseminated through corporate channels or media outlets may remain available for as long as necessary to fulfil the informational, historical or corporate purpose for which they were published, without prejudice to the exercise of the recognised rights.

Where my image forms part of a photographic or audiovisual composition, its removal may require a reasonable period to assess and implement alternative solutions allowing the request to be addressed effectively and proportionately, taking into account the specific circumstances of each case.

**Exercise of Rights:** You may exercise your rights of access, rectification, erasure, restriction, portability, objection and withdrawal of consent by sending a request marked "Data Protection" to: Information Security Department, Calle Federico Salmón, 13, 28016 Madrid (Spain), or by e-mail to: [protecciondedatos@fcc.es](mailto:protecciondedatos@fcc.es). If you consider that your request has not been properly addressed, you may request further information or submit a complaint to FCC's Data Protection Officer and, ultimately, to the Spanish Data Protection Agency (AEPD): [www.aepd.es](http://www.aepd.es).

The applicant acknowledges and expressly accepts that their image, voice, identifying data and audiovisual materials submitted may be used by FCC and FCC Group companies (identified in the latest annual accounts published at [www.fcc.es](http://www.fcc.es)) in corporate communication campaigns, internal marketing initiatives, promotional materials, social

media publications and any other advertising or informational media, whether owned by FCC or by third parties, for the purpose of promoting the Live Healthy Awards, encouraging a culture of safety, health and well-being at work, and strengthening FCC's corporate image. Such use shall always be carried out in a manner respectful of the applicant's dignity and in accordance with applicable legislation.

I, \_\_\_\_\_, declare that I have read and understood this Personal Data Protection Notice and, by ticking the corresponding boxes below, provide my consent to the processing activities indicated.

☐ I consent to the processing of my personal data for the management of my participation in the Live Healthy Awards. If I do not tick this box, FCC will be unable to process my participation.

☐ If my application is selected as a winner, I authorise the dissemination of my identifying and professional data, image, voice and content associated with the winning application through the corporate channels and media provided for in the Live Healthy Awards Rules, for the purpose of communicating the results of the Awards and promoting the recognised good practices.

☐ I authorise the use of my image, voice, identifying data, testimonials and audiovisual materials submitted or generated in connection with my participation in the Live Healthy Awards, for inclusion in promotional, advertising, informational or corporate communication materials of FCC and the FCC Group, both internal and external, including websites, intranet platforms, corporate social media, magazines, digital media, media outlets, corporate campaigns and similar channels, always in relation to the Live Healthy Awards, the promotion of a culture of safety, health and well-being at work, and FCC's corporate image.

Where the materials submitted include images, voice, data or any other element that may identify third parties, I declare that I hold the necessary authorisations or, alternatively, undertake to ensure that such individuals cannot be identified in the materials provided to FCC.

In \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_ 2026.

Signed: \_\_\_\_\_