

## Vantage Towers Spain Privacy Notice in accordance with Art. 13, 14 GDPR

Date: 14 October 2025

This privacy notice applies once you conclude a property related agreement with Vantage Towers Spain (such as for example: lease or sub-lease agreements, right of use agreements, buy out agreements, access agreements etc., hereafter called “**the Contract**”). You can access this privacy notice any time on our website here: <https://www.vantagetowers.com/en/our-company/where-we-operate/espana>. This privacy notice gets updated from time to time, so we would encourage you to check it regularly on our website.

### 1. Data Controller – who is responsible for data processing

Vantage Towers, S.L.U (“Vantage Towers Spain”)

### 2. Address: Edificio Alvento, Calle Vía de los Poblados 1, Area “B” Planta 6 (28033) Madrid

E-Mail: [info.es@vantagetowers.com](mailto:info.es@vantagetowers.com)

### 3. Contact our Group Data Protection Officer

Vantage Towers AG with the addition “To the Data Protection Officer”

Anschrift: Prinzenallee 11-13, 40549 Düsseldorf, Germany

E-Mail: [privacy@vantagetowers.com](mailto:privacy@vantagetowers.com)

### 4. Personal Data which we process

We process the following personal data:

- Your contact and personal information, such as first name, surname and/or family name, address, phone number, mobile phone number, e-mail address, VAT number, ID and passport details;
- Payment and bank information details as necessary to process payment and prevent fraud;
- Any other information necessary for the performance of the Contract or/and that you have provided to us voluntarily, such as any applications, property deeds, drawings, bank and other certificates, property tax certificate (E9), deeds of inheritance or further details in relation to any property;
- Information that is publicly available or accessible from credit agencies or other information database, in particular information from sanctions lists or Land registry Offices/Cadastre, public authorities; Banco de España;
- Data related to your participation in surveys, such as information about the surveys you have received/participated in, your responses to the surveys;
- Your photographs, digital images and sound, provided that we have your consent and
- Your account data (e.g. username or user ID, email address, name), authentication data (e.g. password, security questions/answers), content of requests/interactions with our agents, your

browser data, IP address, language settings, device information, your consent to the use of cookies, your marketing preferences (opt-in/opt-out), call recording when you register, use and access our electronic tools/platforms for the management and monitoring of our landlords' portfolio.

#### 4. Purpose and legal basis for processing your Personal Data

We process your personal data for the following purposes:

1. To fulfill the Contract to which you are party;
2. To communicate with you and other third parties in relation to the Contract (for example to renew or amend the Contract, to inform you about the termination or about an offer, to negotiate the contractual clauses etc.);
3. To plan, execute and administer our Contract (for example for the purpose of internal accounting, invoicing, undertaking maintenance or repairs etc.);
4. To comply with legal archiving obligations (e.g. tax and commercial retention obligations) and, if applicable, resolve any disputes (judicially or extrajudicially), pursue and file for any claims or defend any claims made against us;
5. To ask you to participate to our landlords' satisfaction surveys regarding our collaboration for service improvement purposes. These surveys are in the form of a questionnaire and can be sent to you through company's applications, via email, or they could be conducted through outgoing telephone calls. They can also be carried out by an external partner. In case you choose to participate in a survey, we will analyze your answers and may contact you;
6. To promote and communicate to the general public, initiatives carried out by us or a national or foreign company of the economic group in which we are integrated involving the owners of real estate with whom contractual relations are already established or are intended to be established (brand marketing);
7. To comply with the current regulatory framework for corporate governance. In the context of our compliance with the current regulatory framework, we are obliged to have in our organizational structure an Internal Audit unit and a Regulatory Compliance unit, which within their responsibilities can process your personal data;
8. To select you for participating in our satisfaction surveys and in contract-related initiatives and contact you. We process a limited range of your personal data and specifically contract data (personal data, payment data, information related to the Contract that you have provided to us);
9. To ensure commercial credit, reliability, security of transactions and the exercise of our rights of economic freedom and freedom of information of undertakings, which provide credit, by enabling us to assess your creditworthiness and mitigate any risks when we sign an agreement or conclude a transaction with you and

10. To provide you a seamless and continuous service and support with your queries and requests in the context of your contractual relationship or impending one, with us over our landlords' platform, tools and systems.

The processing of your personal data, for the purposes No. 1-4, is necessary to fulfill the Contract to achieve the objective established in this Clause, to which you are party including its execution. The legal basis for processing your personal data for the purposes No. 1-4, is Art. 6 (1) b) and f) GDPR.

The processing of your personal data for the purpose No. 5, should you choose to participate in a satisfaction survey, and for the purposes No. 8, 9 and 10 is based on our legitimate interests, Art. 6(1) f) GDPR.

The specific types of processing based on our legitimate interests, are carried out after careful weighing of our legitimate interest in relation to the need to protect your personal data and are limited to the absolutely expected and necessary processing, which is compatible with our relation.

The processing of your personal data for the purpose No. 6 is based on your consent, Art. 6 (1) a) GDPR. We will not process your photographs, digital images and sound under any circumstances, unless we request for your consent, and you provide it to us.

The processing of your personal data for the purpose No. 7 is based on our legal obligation, Art. 6(1) c).

## 5. Storage period for Personal Data

- Your Personal Data will be stored either electronically either as hard copy for the duration of the Contract and thereafter until the end of the applicable statute of limitations in accordance with Art. 1.964.2 of Spanish Civil Code (being **five (5) years**), as applicable. Your personal Data will thereafter be deleted unless we are either legally obliged under Art. 6 par. 1 c) GDPR to document and archive your personal Data for a longer period in order to comply with any applicable tax or commercial laws; or you have lawfully consented to a longer storage period in accordance with Art. 6 par. 1 a) GDPR.
- Your photographs, digital images and sound will be stored for as long as the promotion and communication initiatives are taking place, maximum storage period defined under Spanish Law, starting from the date of publication, unless you withdraw your consent. In the case you withdraw your consent, at any time, we will immediately cease processing your photographs, digital images and sound. The withdrawal of your consent has a future effect and does not affect the lawfulness of the processing of your photographs, digital images and sound before its withdrawal.
- Survey data is retained for one (1) year from the date of your participation in it.
- Your browser related data when you access our platform, tools and systems are processed for the duration of the session and thereafter, deleted. Your account data, content of interactions and so forth are retained for five (5) years following the conclusion of our contractual relationship.

## 6. Data subject rights

As a data subject, you have the following rights in accordance with Art. 12 et seq. GDPR:

- request information as to your Personal Data we process (Art. 15 GDPR);
- request to rectify any inaccurate Personal Data or supplement any uncompleted personal data (Art. 16 GDPR); and
- subject to fulfilling the legal requirements, request erasure or restriction or object to the processing of your Personal Data as well as invoke the right to data portability (Art. 17, 18, 20 und 21 GDPR).
- If we process your Personal Data based **on your consent**, you have the right to withdraw this consent at any time with effect for the future. The withdrawal of consent does not affect the lawfulness of processing based on consent before your withdrawal.

You can withdraw your consent either via post, sending a letter under the title **“Consent withdrawal”** with the addition: **“To the Data Controller”** to the address: Edificio Alvento, Calle Vía de los Poblados 1, Area “B” Planta 6 (28033) Madrid or via email under the title **“Consent withdrawal”** with the addition **“To the Data Controller”** to the e-mail address: [info.es@vantagetowers.com](mailto:info.es@vantagetowers.com), stating your name and how and to which address you would like to receive the reply.

- **If we process your Personal Data for the purposes of our legitimate interests (Art. 6 par. 1 f) GDPR, you have the right to object to processing. If you claim your right to object, we will no longer process your personal Data, unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.**

If you claim any of your data subject rights, Vantage Towers will analyze whether the legal preconditions are met. Please address any request to our Group Data Protection Officer either via post to the address: Prinzenallee 11-13, 40549 Düsseldorf, Germany with the addition **“To the Data Protection Officer”** and with the indication: **“Exercise of GDPR Rights”** or via email to the address [privacy@vantagetowers.com](mailto:privacy@vantagetowers.com) with the addition: **“To the Data Protection Officer”** and the indication: **“Exercise of GDPR Rights”**, stating your name and how and to which address you would like to receive the reply.

We will respond to your requests free of charge within one (1) month of receiving the request. In exceptional cases this deadline may be extended for two (2) months if required due to the complexity of your request. In any case, we will inform you about this extension and the reason for the delay.

If we consider that your request is manifestly unfounded or excessive, we reserve the right to request a reasonable fee for its satisfaction, taking into account the administrative costs for its execution or even to refuse to follow up on your request.

5. In case you think that we have not sufficiently satisfied your request and the protection of your personal data is affected in any way, you can submit a complaint to the Spanish Data Protection Agency

Datos (<https://www.aepd.es/>), postal address: C/ Jorge Juan, 6. 28001 - Madrid, tel. +34 [900 293 183](tel:900293183).

## 7. Recipients or categories of recipients

We may share your Personal Data with third parties, if necessary, for the performance of the Contract, for the performance of any satisfaction surveys, for the performance of selected contract related initiatives, or in case of processing of your photos, digital images and sound, if necessary for the public promotion and communication of Vantage Towers or a national or foreign company of the economic group in which Vantage Towers is integrated for initiatives regarding the owners of real estate (Clause 4, par. 6), being:

- Vantage Towers Group companies;
- Vodafone Group companies;
- Third parties outside the above Groups who are involved as service providers/Data processors;
- Government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law and
- In conjunction with any corporate transformation, merger, sale or acquisition of a company in the Vantage Towers Group or any business unit transfer.

Eventually we may transmit Personal Data to countries outside the European Economic Area (third countries), which may not provide the same data protection level. Unless there is an adequacy decision – pursuant to Art. 45 GDPR – by which the European Commission determines an adequate level of protection in the respective third country, we have taken measures to ensure adequate and appropriate safeguards for the protection of your Personal Data. These include so-called EU standard contractual clauses that have been concluded with recipients of the Personal Data and that provide for appropriate safeguards (Art. 46 GDPR). If a transfer to companies belonging to the Group is necessary for the execution of the Contract and/or for the execution of the promotional and communication initiatives (brand marketing), this is secured by corresponding reciprocal agreements.

We transfer your Personal Data to the following categories of service providers, listed according to the respective service provider's task area:

- **Acquisition:** acquisition service providers for the purpose of negotiation contracts;
- **Planning:** planning service providers for the purpose of establishing network plans or other construction plans;
- **Construction:** construction service providers such as civil engineering, steel construction, electrical engineering, air conditioning, building technology, construction management;
- **In-life-management:** monitoring service providers;
- **Maintenance:** maintenance service providers;
- **Property management:** property management service providers;
- **Energy:** energy service providers;

- **IT:** IT service providers; and
- **Marketing:** brand marketing agencies, communications campaign agencies, media strategic planning service providers, customer satisfaction survey service providers.

Our processors laid out above are entitled to use sub-contractors, which may be granted access to your personal Data as necessary for undertaking the services.

## 8. What are the steps we take to protect your data

We apply the appropriate technical and organizational measures in our business processes and systems and platforms used to collect, process or use the data. The same obligations are ensured that are fulfilled by our service providers over the data processing agreements that we have entered into with them (Art.28 GDPR). We remain the Controller of the personal data being processed.

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