

Vantage Towers Privacy Notice in accordance with Art. 13 and 14 GDPR & Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights

Date: 30.10.2025

This privacy notice applies once you conclude an agreement with Vantage Towers, S.L.U. either as a freelancer (natural person operating under own name) or you are engaged by Vantage Towers, S.L.U. via an employment agency or an outsourcing services provider (hereinafter referred to as “external workforce”) (hereinafter referred to as „**the Contract**“). If needed, you can access this privacy notice any time in our website <https://www.vantagetowers.com/en/our-european-markets/spain> and in the Vantage Towers Spain [Landing Page - Home](#)

1. Data Controller – who is responsible for data processing

Vantage Towers, S.L.U.

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

E-Mail: infor.es@vantagetowers.com

2. Contact our Group Data Protection Officer

Vantage Towers AG – Attn: Data Protection Officer –

Address: Prinzenallee 11-13, 40549 Düsseldorf, Germany

E-Mail: privacy@vantagetowers.com

3. Personal data which we process

For the purpose of fulfilling the Contract, we process the following personal data:

- **Personal information** , such as name, address, personal email address, telephone number, emergency contact details, bank account, signature;
- Personal information such as your photographs, digital images and sound, captured and processed through technical means allowing your identification or authentication;
- **Employment information like your professional background** , such as your CV;
- **Role information**, means role related information such as an identification number, contact details, role title, job description (as applicable);
- **User authentication information**, such as your username and password required to log in to the Vantage Towers corporate network;
- **Your use of Vantage Towers devices** and corporate network, services, systems, networks, accounts and corporate communications
- **Security in the workplace**, such as onsite CCTV footage and access card records

4. Purpose and legal basis for processing your personal data

We process your personal data for the following purposes:

- **Administering your engagement**, such as organizing interviews and onboarding or processing time sheets where required;
- **Access management**, such as to give you physical access to Vantage Towers premises and access to the corporate network and applications when required;
- **Internal and External communications and involvement**, such as where you register for internal networks, corporate events and /or third -party events for promoting the company as an employer, company's activities and involvement in industry events;
- **Maintaining health , safety and wellbeing**, such as managing safety and wellbeing incidents;
- **Organisation, effectiveness, and change**, such as internal reporting or analysis to support business and cultural change or reviewing organizational effectiveness. For example, the proportion of external workforce (in different functions or at office locations in the business;
- **Monitor compliance with Vantage Towers policies**, such as information security or completion of any mandatory compliance training where required;
- **Meeting our legal and regulatory obligations** when you are engaged by Vantage Towers;
- **Meeting our contractual obligations** with our external workforce ;
- **Defend Vantage Tower's legal interests**, for example in legal or investigatory proceedings in accordance with applicable laws.

Processing your personal data as set out in Clause 3 above is necessary for achieving the purpose laid out in this Clause, including the performance of the Contract.

The legal basis for processing your personal data is:

- **The performance of a contract with Vantage Towers** subject to the terms of the Contract between Vantage Towers and the supplier you are supplied by or engaged through, or your Contract with Vantage Towers (Art. 6 para. 1 a) GDPR);
- **Vantage Tower's legitimate business interests**, including for example, managing your engagement with and/or working for Vantage Towers, fraud prevention, and maintaining the security of our corporate network and internal systems (Art. 6 para. 1 f) GDPR);
- **Compliance with a mandatory legal obligation**, where certain information is necessary to satisfy a legal or regulatory requirement, subject to strict internal policies and procedures which control the scope of legal assistance to be provided (Art. 6 para. 1 c) GDPR);
- **Consent you provide**, where Vantage Towers does not rely on another legal basis or in addition to performance of a contract or reliance on our legitimate business interests, you choose to

provide us with your personal data and the processing of that information is voluntary, including for example, when you take part in events organized by Vantage Towers and or in events organized by third parties where you represent Vantage Towers (Art. 6 para. 1 a) GDPR). Your consent can be withdrawn at any time.

If we process your personal Data for the purposes of our legitimate interests (Art. 6-1 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 defence of legal claims.

If you claim any of your data subject rights, we will analyze whether the legal preconditions are met. Please address any request to our Group Data Protection Officer. Their contact details are available under section 2. In addition, you have a right to lodge a complaint with a supervisory authority **Agencia Española de Protección de Datos**, <https://www.aepd.es/preguntas-frecuentes/13-reclamaciones> (Art. 77 GDPR).

- **Analytics and automated decision making**

We may process the personal data that we collect about you to do reporting and analytics for the purposes identified in section 4 of this statement. Some cases may involve profiling which means evaluation, analysis or prediction of aspects concerning you and your performance when working at Vantage Towers, including for example for the purposes of performance and reporting to our HR services providers or fraud prevention.

We do not use analytics for automated decision-making (that is, decision making with no human involvement) which would produce legal effects or other similar significant impacts on you. The insights are used to generate additional information, for example, relating to reporting or business planning.

- **Storage period for personal data**

Your personal data will be stored for the duration of the Contract respectively the engagement and thereafter until the end of the applicable statute of limitations being 5 years. Your personal data will thereafter be deleted, unless we are either legally obliged under Art. 6 para. 1 c) GDPR to document and archive your personal data for a longer period in order to comply with any applicable tax laws or commercial laws; or you have lawfully consented to a longer storage period in accordance with Art. 6 para. 1 a) GDPR.

- **Data Subject rights**

You have the following data subject rights in accordance with Art. 15 et seqq.:

- request access to your personal data and additional information we process and store (Art. 15 GDPR);

- request to rectify any inaccurate personal data or to complete any incomplete personal data (Art. 16 GDPR);
 - the right to data portability (Art. 20 GDPR);
 - the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal (Art. 7 para. 3 GDPR); and
 - subject to fulfilling the legal requirements, request erasure, restriction of processing or object to the processing of your personal data (Art. 17, 18 und 21 GDPR).
- If you exercise any of your data subject rights, Vantage Towers will analyze whether the legal prerequisites are met. Please address any request to our Group Data Protection Officer. In addition, you have a right to lodge a complaint with a supervisory authority : **Agencia Española de Protección de Datos, C/ Jorge Juan, 6. 28001 – Madrid, <https://www.aepd.es/preguntas-frecuentes/13-reclamaciones>** Art. 77 GDPR).

- **Recipients or categories of recipients**

We may share your personal data with:

- Companies in the Vodafone Group (being Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital) and Vantage Towers Group (being Vantage Towers AG and any company or other organisation in which Vantage Towers AG owns 50% or above of the share capital);
- HR services providers for the purposes of administering your engagement with Vantage Towers;
- Companies or consultants who are engaged to perform services for or on behalf of the Vantage Towers Group or a company in the Vantage Towers Group, including, for example, those who process our benefits and discount schemes or manage our premises;
- Law enforcement agencies, government bodies, regulatory organisations, courts, other public authorities or other third parties if we have to, or are authorized to by law;
- In conjunction with any merger, sale, or acquisition of a company in the Vantage Towers Group.

Eventually, we may transmit personal data to countries outside the European Economic Area (third countries), which do not provide for 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, Vantage Towers has 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, this is secured by corresponding reciprocal agreements.

A data processing agreement pursuant to Art. 28 para. 3 GDPR has been concluded with these service providers. We remain the controller for the data processing.



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