

## Rules of the claim and complaint channel

**In accordance with the provisions of article 31 bis.5.4 of the penal code and article 24 of the organic law on data protection and the guarantee of digital rights (LOPDGDD).**

The code of conduct of PROJECTES MODULARS PREFABRICATS, SL U, hereinafter referred to as ENTITY, formally establishes the values, references and rules that must guide the behavior of the natural and legal persons who form part of it, as well as their actions with customers, suppliers, and external collaborators. This document mentions the claim and complaint channel as a key communication tool for reporting any irregularities that may constitute a violation of the law and the code of ethics. In addition, this claim and complaint channel is one of the pillars of the model for preventing criminal offenses and complying with the General Data Protection Regulation (GDPR) and the Organic Law 3/2018 of 5 December on data protection. personal and digital rights guarantee (LOPDGDD),

### I. **Scope**

This regulation defines the functioning and the principles of the ENTITY's claim and complaint channel and will be applicable to all communications sent from this tool by the people who make up the ENTITY, as well as by third parties who send their complaints or requests from the form available for this purpose on the company's website.

### II. **Purpose of the claim and complaint channel**

The purpose of the claim and complaint channel is to make available to individuals within the ENTITY and to third parties having a relationship with the ENTITY an easily accessible tool through which it is possible to report and communicate irregularities related to the ENTITY.

### III. **Operation of the claim and complaint channel**

#### III.I **Guiding principles**

All communications, incidents or questions sent through the claim and complaint channel will be handled in accordance with the following principles:

- Independence: actions resulting from communications received will be managed by the legal department, through the data protection officer, to guarantee autonomy in its management and decisions.
- Objectivity: an exhaustive and complete analysis of the facts and circumstances that have been communicated by the claim and complaint channel will be guaranteed. Avoid any type of arbitrariness in the procedures, in accordance with the protocol

defined for this purpose \*. The resolution of each communication received will always be duly justified.

- Confidentiality: the actions carried out will be carried out in a discreet and absolutely confidential manner, both in the research and analysis and in the collection and processing of the necessary information, in compliance with the general data protection regulation EU 2016/679 (RGPD ) and Organic Law 3/2018, of December 5, on the protection of personal data and the guarantee of digital rights (LOPDGDD).
- Authority: The ENTITY establishes the competence and authority of the legal department, through the Data Protection Officer, to manage communications sent through the claim and complaint channel and to perform all required actions, as established in the protocol response from the claim and complaint channel.
- Anti-retaliation policy: in no case will retaliation be exercised against those who make any type of request, complaint, or communication through this channel, whether the facts are true or not.

### **III.II Information processing**

All communications made through this channel will be received and analysed, at first instance and only by the Legal Department, through the Data Protection Officer of the ENTITY. Once the preliminary analysis of the facts has been carried out, the appropriate actions and steps will be taken in accordance with the protocol defined for this purpose.

### **III.III Data protection clause**

The complainant can remain anonymous by completing only the mandatory information necessary for the investigation of the reported event and marked with an asterisk on the form. The ENTITY guarantees the confidentiality and anonymity of complainants.

In accordance with the provisions of Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR) and (Article 11 of Organic Law 3/2018, of December 5, relating to the protection of data and the guarantee of digital rights (LOPDGDD), concerning the protection of individuals regarding the processing of personal data and the free movement of such data. Responsible for the data provided, informs you:

Responsible for processing your personal data: - PROJECTES MODULARS PREFABRICATS, SLU NIF: B25759028, C / IVARS DE URGELL, 20 FT NEOPARC -

25190

LLEIDA,

Phone :

973603954,

protecciodedades@pmp-pretaporter.com.

**Purpose:** Reception, management, and storage of complaints.

**Conservation:** data provided will be treated confidentially and with the guarantees and confidentiality measures required by law. The personal data provided will be kept if their deletion is not requested by the interested party or for the period necessary to comply with legal obligations. Beneficiaries: The data provided will be processed and, if necessary, passed on to interested third parties, advisers or public authorities for the purposes of research and clarification of the reported facts, determination of responsibilities, the implementation of corrective actions and, where appropriate, the introduction of the legal and disciplinary actions required with the responsible bodies in each case.

**Legitimation:** Your data will be processed based on your consent, which is requested in this document.

**Rights:** We inform you of the possibility of exercising the following rights over your personal data by contacting our tax address or by e-mail, by identifying you correctly and clearly requesting the right to exercise the right of access, rectification, erasure or forgetting, limitation, opposition, portability and not to be subject to automated individual decisions. You can also withdraw the consent granted.

You can also contact the competent data protection supervisory authority for further information or to file a complaint.

#### **III.IV Receivers of the communications of the claim and complaint channel**

All communications made through this channel will be received and analysed, in the first instance and only by the Head of Compliance and Business Processes, at the following address the ENTITY. After having carried out a preliminary analysis of the facts, it will initiate the appropriate actions and procedures in accordance with the protocol defined for this purpose.

*\*Claim and complaint channel response protocol.*