

Privacy Policy

1. Preliminary

FRINSA DEL NOROESTE, S.A, according to the provisions of 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 and on the free movement of such data (hereinafter, the "GDPR"), and likewise in fulfilment of Spanish Personal Data Protection regulations, sets out information below regarding the following aspects concerning the processing of personal data via this Website.

We invite you to read our complete Privacy Policy below so as to understand in detail the use we make of your personal data and the rights you enjoy in connection therewith.

2. Identification of the data controller

This document governs the privacy policies of the website owned by FRINSA DEL NOROESTE, S.A (hereinafter, the "Website").

For your information, we here provide the full identification details of FRINSA DEL NOROESTE, S.A. (hereinafter, "FRINSA"):

-Company name: FRINSA DEL NOROESTE, S.A

- Registered office: Polígono Industrial Xarás, Avenida Ramiro Carregal Rey, Parcela 29, 15969 Ribeira, A Coruña, Spain

- Spanish Tax ID: A15010564

- Entered in the Business Registry of Santiago de Compostela, Volume 344, Page 99, Sheet SC-4428.

- Email address: lopd@grupofrinso.com

- Telephone number: +34 981 835 005

3. Personal data processed

This Privacy Policy governs the processing of data by FRINSA with regard to users accessing the Website or contacting FRINSA via the Website, in addition to personal data of all the following categories of data subject: (i) customers and/or potential customers; (ii) suppliers and/or potential suppliers; (iii) employees or candidates.

The categories of data gathered are identification data (not including specially protected data categories), such as: (i) forename and surname; (ii) telephone

number; (iii) email address; (iv) URL address; (v) postal address (town, province and country); (vi) IP address; (vii) CVs; (viii) or other non-identifying information connected with browsing habits.

The content of the Website is intended for users who are of legal age, and the sending of personal data via all forms provided on the Website requires a minimum age of 18 years, or as the case may be, sufficient legal capacity to enter into contracts, and information concerning legal minors is therefore not intentionally gathered.

4. Purpose and legitimate basis of processing

FRINSA will make use of the data gathered for the following purposes: (i) administer communications regarding the services provided; (ii) maintain commercial, contractual or pre-contractual relations; (iii) process consultations; (iv) handle requests for information according to the form used to contact us: Quality, HR, Commercial, Purchasing, Marketing; (v) possible selection processes.

Users are informed that all data that FRINSA request or might request of them are needed for the purposes described in this privacy policy, and a failure to provide them would make it impossible to contact the User or to handle the request that the User has made of FRINSA. FRINSA likewise reserves the entitlement not to respond to or process requests that fail to include the data requested.

Users warrant the accuracy of the personal data provided to FRINSA. For its part, FRINSA may periodically request that Users review and update the personal data that it holds about the Users.

Users may find information on the Website which may be of use to learn about the services offered by FRINSA. In this regard, FRINSA will only request from Users and process the data required to handle the query raised, provide the contracted service or be in a position to begin and maintain a commercial, contractual and/or pre-contractual relationship with the Users.

A description is given below of the different purposes for which the personal data of Users are processed, and the legitimate bases for processing:

1. On the basis of the legitimate interest of FRINSA: Administer requests for information, queries or claims that Users may submit via the different forms enabled on the Website, allowing us to resolve their request as effectively and appropriately as possible.

4.1. Data processing associated with mere web browsing

Mere browsing of the Website will not in general entail the processing of Users' personal data, beyond, in specific cases, their IP address and data concerning their browsing, for the purpose of administering and optimising the Website, justified by the legitimate interest of FRINSA to maintain the security and integrity of the Website. For further information, Users may consult our Cookies Policy.

5. Third parties to whom data may be transferred

The personal data that Users provide to FRINSA may be communicated to the following categories of recipient:

- Third parties to which FRINSA is obliged to transfer information, such as public authorities, in order to fulfil the demands of such authorities and the applicable regulations, as the case may be.
- Companies belonging to the FRINSA Group, in order to be able properly to administer the contractual or pre-contractual relationship, as a consequence of the centralisation of administrative and information technology processes existing within the Group.
- Auditors, lawyers, insurers and/or accounting firms and other external consultants and providers of products or services, who access the personal data as data processors, under its control, and to the extent strictly necessary to provide the services contracted from them;
- The Tax Agency and other public administrations, to fulfil legal obligations, such as taxation obligations;

6. Data security

FRINSA has appropriate policies and technical and organisational measures in place to safeguard and protect the personal data of Users against illegal or unauthorised access, loss or accidental destruction, damage, use and unlawful or unauthorised disclosure.

We will likewise adopt all reasonable precautions to ensure that our personnel and employees that have access to the personal data of Users have received appropriate training.

Users are in all cases informed that no transfer of data via the Internet is completely secure, and is as such performed at their own risk and venture. Although we will dedicate our best efforts to protect the personal data of Users, FRINSA cannot guarantee the security of personal data transferred via our Website.

7. Storage of data

The storage period for Users' data will be determined in accordance with the duration of their relationship with FRINSA and the legally established periods. In this regard, the criteria employed by FRINSA to establish the storage periods for the Users' data have been determined in accordance with the requirements established in the applicable legislation, regulations and regulatory directives, in addition to the operational requirements of FRINSA in connection with the proper management of the existing relationship with the different categories of data subject.

Once the relationship with the Users has ended, their personal data will be deleted at the point at which all necessary actions have been taken to administer and conclude any obligation which may remain in place between the parties, with all necessary administrative procedures being conducted during this period, except in those cases where the Users have given us their explicit consent to send them commercial communications, in which case the data will be stored until they register their opposition.

Irrespective of our processing of your data for the time strictly necessary to fulfil the corresponding purpose, we will subsequently store them, duly safeguarded and protected, for as long as any liabilities could arise from the processing, in fulfilment of the regulations in force at the time in question. Once any possible action has in each case expired by statute of limitation, we will proceed to erase the personal data.

8. Exercise of Users' rights

Users may, whenever they see fit, contact FRINSA to exercise their rights of access, rectification, erasure, restriction, opposition, and also the right to the portability of their data and not to be subject to automated decisions, by sending a request to FRINSA at Polígono Industrial Xarás, Avenida Ramiro Carregal Rey, Parcela 29, 15969 Ribeira, A Coruña, or the following email address: lopdp@grupofrinosa.com. Users may via the same channel revoke their consent, without retroactive effect, or oppose the receipt of commercial communications.

Lastly, should the User wish to receive further information as to their rights regarding data protection, or should they need to file a grievance, they may contact the Spanish Data Protection Agency at the address Calle Jorge Juan, 6, 28001, Madrid or directly via its website <https://www.aepd.es/>, in order to safeguard their rights.

9. Changes to this privacy policy

FRINSA reserves the right to amend this Privacy Policy in line with legislative or case-law developments, or sectoral practices. In such cases, the changes made will be announced on this webpage sufficiently in advance of implementation.

10. Contact FRINSA

If you have any doubts or questions to convey to FRINSA in connection with the processing of your personal data, you may write to FRINSA at Polígono Industrial Xarás, Avenida Ramiro Carregal Rey, Parcela 29, 15969 Ribeira, A Coruña, or the following email address: lopdp@grupofrinosa.com.

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