

## Privacy policy: extended information

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## Presentation

Our privacy policy complies with the provisions of the RGPD 2016/679 of April 27, 2016 on the Protection of Personal Data, so we wish to inform you of the processing of personal data that you entrust to us.

## What is personal data?

Any information about an identified or identifiable natural person. That is to say, about persons. It is a fundamental right of yours.

## Who is the owner of the data?

An identifiable natural person whose identity can be determined, directly or indirectly, in particular by means of an identifier, such as a name, an identification number such as a DNI/NIF or social security number; location data, such as a home address, web address (geolocation services), e-mail address or social network profile; other online identifiers or elements of the person's physical, physiological, genetic, psychological, economic, cultural or social identity, for example, a dental cast, certain genetic or physical tests, etc.

## Who is responsible?

AICOX SOLUCIONES S.A., IBERCOMPONENTES CATALUÑA, S.A., DIGISAT MEDIA S.A. and ALPHAC2 COMERCIALIZAÇÃO DE SISTEMAS ELECTRÓNICOS E DE COMUNICAÇÕES, LDA **are responsible for the processing of your data** and provide services in the facilities of the **(AICOX GROUP)**. You can contact the headquarters of AICOX GROUP, located at Av. Somosierra, 12, 1º OF. A, 28703, San Sebastián de los Reyes (MADRID), Phone: 916592970, E-mail: [protecciondedatos@aicox.com](mailto:protecciondedatos@aicox.com)

## What types of personal data exist?

- **Filiation data** (name, surname, date and place of birth, sex and nationality; DNI/NIF, NIE or residence card, SS number or health card if applicable; insurance company and policy number if applicable; domicile (address, postal code, town, province); e-mail, landline and/or cell phone, etc.).
- **Other personal characteristic data:** image (photographs, diagnostic images, casts), voice, physical marks, physical or anthropometric characteristics (height, weight, hair color, etc.); signature, fingerprint, electronic signature.
- **Data relating to social circumstances:** marital status, family data (children, parents, siblings); property, possessions; hobbies and lifestyle, membership in clubs and associations; licenses, permits or authorizations.

- **Academic and professional data:** generally in the "Curriculum Vitae", such as education, degrees, academic record or training history throughout pre- and post-professional life, professional experience, membership in professional associations.
- **Employment details:** profession, job title, non-financial data from payroll or employee history.
- **Data providing commercial information:** activities and businesses, commercial licenses, subscriptions to publications or media, artistic, literary, scientific or technical creations.
- **Financial data:** bank details; credit or debit card numbers, details and history; income, revenues, investments, assets; salary and payroll financial data, tax rates and deductions; mortgages, loans, credits, guarantees; investments, pension plans, retirement; insurance, subsidies, other benefits; financial transactions, compensation or indemnities.
- **Special category data:** data relating to your religion, trade union membership, political party to which you vote or belong, racial origin, health or sex life, criminal or administrative offenses.

## What types of personal data do we process?

### *Data of our personnel*

We consider as personnel those hired by us and professional or self-employed collaborators, as well as suppliers' personnel working in our facilities.

- **Filiation data** (name, surname, date and place of birth, sex and nationality; DNI/NIF, NIE or residence card, SS number; medical insurance if applicable; domicile (address, postal code, town, province); e-mail, landline and/or cell phone, etc.).
- **Other personal data:** image (photograph); signature, electronic signature if applicable.
- **Data relating to social circumstances:** marital status, family data (children, parents, siblings); membership; licenses, permits or authorizations as appropriate.
- **Academic and professional data:** in the "Curriculum Vitae" of candidates and in the personnel file of employees and regular external collaborators, such as education, degrees, academic record or training history throughout pre- and post-professional life, professional experience, membership in professional associations.
- **Employment details:** profession, job title, non-financial data from payroll or employee history.

- **Data providing commercial information:** activities and business with external partners, scientific or technical publications.
- **Financial data:** bank details; salary and payroll financial data, tax rates and deductions; pension plans, if applicable; retirement; insurance if applicable; compensation.

### *Other related data*

We consider other related parties to be people from customers and suppliers, and in general people from other organizations with which we have relationships.

- **Affiliation data:** name, surname(s); DNI/NIF, NIE or residence card if applicable; professional e-mail, landline and/or professional cell phone number.
- **Other personal data:** image during visits, video surveillance; joint commercial events or in commercial brochures (photographs); signature, electronic signature if applicable.
- **Academic and professional data:** generally in the "Curriculum Vitae" as appropriate, such as education, degrees, training history throughout pre- and post-professional life, professional experience, membership in professional associations.
- **Employment details:** profession, job title.
- **Data providing commercial information:** scientific or technical publications if applicable.
- **Commercial or mercantile data:** position, address, others necessary for the relationship.

## Where is your data stored?

The personal data you provide will be incorporated into computerized databases or physical files, which in turn are subject to security measures and collected in a register of activities owned by AICOX SOLUCIONES S.A., IBERCOMPONENTES CATALUÑA, S.A., DIGISAT MEDIA S.A. and ALPHAC2 COMERCIALIZAÇÃO DE SISTEMAS ELECTRÓNICOS E DE COMUNICAÇÕES, LDA.

## What is an activity log?

It is a list and summary information of the data processing we perform and is available to the Spanish Data Protection Agency.

## How and from where do we collect the data we process?

### *Data provided by the owner of the data himself*

The holder gives us his data by means of:

- **Express consent**

For the delivery of the data necessary for the relationship (contracts, payments and collections, etc.).

In the case of candidates or users, by means of a document that they sign when they visit our company or by means of a free and voluntary transfer when sending an e-mail or registering on our website.

It is very important that you know that without this consent we will not be able to process your data and therefore we will not be able to provide you with the service or relationship you request.

- **Reception of communications to mobile devices or e-mail:**

News, newsletters or Push notifications (mobile notifications: SMS, other notification systems).

E-mail address, cell phone number and other necessary data are processed.

- **Use of information from our online platforms IF APPLICABLE**

By platforms we mean our website, Apps and/or on-line consultations, which are our information platforms.

<https://www.aicox.com/>

- **Acceptance of Cookies on the website.**

The website contains our Cookie Policy information.

### *Data not provided by the owner of the data himself*

- **Inferred data**

They are data not provided consciously and voluntarily by the user resulting from the application of algorithms.

AICOX GROUP does not use or analyze, in any case, external means to our direct relationship with our customers and related parties.

All inferred data that we may use relates to your interaction with us or with legitimate partners and suppliers.

### **Conservation period:**

It will be the necessary for its treatment, while the contractual relationship lasts, until the opposition to the treatment of the holder and in any case during the legally established period for the conservation of the legal documentation.

- **Data obtained from web queries:**

For a period of 1 year, unless they are necessary for the data subject to continue using the consultation service, or until the data subject exercises his or her rights of opposition, limitation or deletion.

- **Cookies**

They will be kept for a maximum of 12 months; after this period, consent will be sought again for efficient and effective navigation.

- **Other data.**

The rest of the personal data collected by AICOX GROUP, will be kept for the time legally provided for, such as video surveillance images, contracts and other legal documents, or until the interested party exercises his right of opposition or deletion, unless otherwise required by law.

- **Fiscal and tax data.**

They will be kept for 4 years in accordance with tax regulations (General Tax Law and complementary or additional national and regional laws).

- **Social Security data.**

They will be kept for the period of time determined in each case by the Social Security regulations; in the case of affiliation data, 4 years.

- **Video surveillance data.**

They shall be kept for 1 month unless they may constitute a criminal or administrative offense.

- **Voice recording data.**

They shall be kept for 1 month unless they may constitute a criminal or administrative offense.

## Legitimation

It is the condition that gives legal capacity to process the data. There are several reasons:

- **By contract and legitimate interest for the services provided by the AICOX GROUP.**

Legitimate interest is an overriding interest of the data controller to carry out the data processing (e.g. video surveillance for the security of the premises).

- **By legal obligation.**
- **By consent of the interested party.**

When the circumstances of legal legitimacy or overriding interest do not exist, we will request your express consent for the processing of your personal data, and this will be stated.

In this area, we may also request your consent for the use of your data for different purposes, such as promotions, service information, etc.

## For what purpose do we process your data?

In general in order to carry out our services and the mission of our organization.

In particular, we collect personal data for the following specific purposes:

- **Customers and related parties: To provide the contracted service.**

The personal data of customers are necessary for the relationship, the main and complementary services requested and to comply with the legal obligations arising from our activity.

In turn, they are necessary for the billing of the service provided.

- **Citizens in general: To provide the web consultation service.**

We collect the data entered by the applicant in order to be able to respond to the query. It will not be possible, by this means, to provide special category data, which will be immediately deleted.

The non-acceptance of this purpose entails the impossibility to offer the consultation service that we have.

- **Advertising**

We may use direct marketing (a form of advertising that uses one or more media to communicate directly with a target audience and elicit a measurable response from them) to create tailored services or report on improvements and developments that may be of interest to cardholders.

## To whom do we give your data?

The data will be communicated to other organizations of the group of companies that make up the AICOX GROUP, for internal administrative purposes, including the processing of personal data of customers, suppliers or employees.

No data is transferred to third parties, except in the case of legitimate interest or legal obligation, and data transfers are always carried out with the data strictly necessary for the execution of the service offered by AICOX and when it would be impossible to do so without such transfer.

- **Personnel data**

The entities necessary for the complete performance of our activity are mainly but not exclusively the following (Processors): labor consultancies, occupational health and safety companies and legal consultancies in the case of employees; tax consultancy in the case of collaborators; in any case, other complementary consultancies that are necessary for the activity with the required quality and legal compliance; plus the Public Administration in the legal assumptions.

- **General data**

Other entities necessary for the complete performance of our activity are mainly but not exclusively the following (Data Processors): security companies (video surveillance), courier companies (limited), external IT service companies, mailing companies, survey companies (with the consent of the owner) and in general other entities and organizations that are necessary for the activity with the required quality and legal compliance; plus the Public Administration in the legal cases.

## Safety measures

AICOX GROUP has implemented a quality system certified in accordance with the international standard ISO 9001: 2015 that monitors legal compliance and also the security measures required by the Organic Law on Data Protection 19/1999 of December 13, and its implementing regulations, as well as the security measures required by the European Regulation 2016/679.

The AICOX GROUP has implemented security measures described in its management and quality processes and procedures and measures to protect its information systems, all of which are described in its Security Document.

## What rights do data subjects have?

The owner of the data has the right to **access, rectify, delete, limit, carry and oppose** the processing of his/her data.

We recommend the **Citizen's Guide published by the Spanish Data Protection Agency**, where the rights are explained in a very understandable way and which is available at the following link:

[http://www.agpd.es/portalwebAGPD/canaldocumentacion/publicaciones/common/Guias/GUIA\\_CIUDADANO.pdf](http://www.agpd.es/portalwebAGPD/canaldocumentacion/publicaciones/common/Guias/GUIA_CIUDADANO.pdf)

The rights available to the holder consist of:

### Access

The right to obtain confirmation as to whether or not personal data concerning him/her are being processed and, if so, to the following information: purposes of the processing; categories of data being processed; recipients or categories of recipients to whom the data have been or will be disclosed; expected time period for the storage of such personal data or, if this is not directly possible, the criteria for determining such time period.

The holder may exercise this right every six months, unless there is legitimate cause to request it more than once within this six-month period.

When the holder exercises this right of access, we will provide a copy of the personal data being processed in a readable format of the data subject's choice. In any case always taking into account the interest of the data subject and the legal provisions.

If access requests are manifestly unfounded or excessive, especially if they are repetitive, we may charge a fee to compensate for the administrative costs of fulfilling the request, and this fee will correspond to the actual cost of processing the request.

Regarding the procedures, we will inform the interested party about the actions derived from its request within one month (and up to two more months in particularly complex requests, notifying the extension within the first month).

If we decide not to process a request, we will inform the data subject of this decision, giving reasons for the refusal, within one month of the request; the data subject may file a complaint with the Spanish Data Protection Agency.

### *Correction*

It is the right to obtain the rectification of inaccurate personal data or to complete incomplete personal data by means of an additional declaration, always taking into account the purposes of processing.

To do so, the interested party must request it, indicating the data to which it refers and the desired correction; if necessary, accompanying the documentation justifying the inaccuracy or incompleteness of the data being processed.

### *Suppression*

The holder shall have the right to obtain the erasure of his personal data in the following circumstances: that they are not necessary in relation to the purposes for which they were collected or processed; that he withdraws his consent and the processing is not based on another legal basis; that he objects to the processing and no other legitimate grounds for the processing prevail; that they have been processed unlawfully.

When the deletion results from the exercise of the right to object for direct marketing purposes, we may retain identifying information in order to prevent future processing for direct marketing purposes.

Where we have transferred personal data and are obliged to delete such data, we will take reasonable steps, taking into account available technology and the cost of implementation, including technical measures, to inform the Processors who are processing the personal data with a request for deletion.

The foregoing shall not apply for compliance with a legal obligation requiring the processing of data, or for the performance of a task carried out in the public interest or in the exercise of entrusted public powers; for scientific or historical research purposes or statistical purposes, insofar as the right of erasure could make impossible or seriously hinder the achievement of such purposes; for the formulation and exercise or defense of claims.

### *Opposition*

The owner shall have the right to object to the processing of his/her data at any time, except in the aforementioned legal cases.

If the holder exercises this right, we will stop processing his or her personal data, unless we can demonstrate compelling legitimate grounds for the processing to override his or her interests, rights and freedoms, or for the formulation, exercise or defense of claims, as well as the necessary preservation in accordance with the law or for reasons of public interest where there is one.

When the processing of personal data is for direct marketing purposes, the holder shall have the right to object at any time and in that case the personal data shall immediately cease to be processed for such purposes.

### *Treatment limitation*

The owner will have the right to limit the processing of his/her data when any of the following conditions are met:

- when the holder has declared the inaccuracy of his personal data, during the period that allows us to verify the accuracy of the same;
- in the event that the owner considers that the processing is unlawful and we have opposed the deletion of his personal data and instead requests the limitation of its use;
- we no longer need the personal data for the purposes of processing, but it must be retained for legal reasons or for the formulation, exercise or defense of claims;
- the data subject has objected to the processing, while we verify whether our legitimate grounds override theirs.

When the holder has obtained the limitation of the processing in accordance with the exercise of this right, we will inform him/her before the lifting of such limitation.

In the same vein, we will communicate any rectification or deletion of personal data or limitation of processing to each of the recipients to whom the personal data has been transferred or communicated, unless it is impossible or requires a disproportionate effort. Upon request, we will inform the owner about such recipients.

Likewise, the data subject may revoke consent to certain types of processing at any time with future effect. However, this revocation does not affect the lawfulness of the processing prior to the revocation of consent or insofar as the processing can be justified by another legal basis.

### *Portability*

The data subject shall have the right to receive his or her personal data that he or she has provided to us and is in our possession, in a structured, commonly used and machine-readable format, and to transmit it to another data controller without being prevented by us, where the processing is based on consent, and is carried out by automated means.

The data subject shall also have the right to have his or her personal data transmitted directly from controller to controller when technically feasible.

The exercise of this right shall be without prejudice to the powers granted by the right of deletion.

The right to portability does not extend to data that we would have inferred from data directly derived from our services.

## Where can data subjects exercise their rights?

To exercise their rights, the holder may write to our headquarters, located at Av. Somosierra 12, 1º OF. A, 28703 San Sebastián de los Reyes (Madrid) or contact us at the following e-mail address [protecciondedatos@aicox.com](mailto:protecciondedatos@aicox.com)

You may also file a complaint with the Spanish Data Protection Agency.