

## Privacy Policy

### Who is responsible for the processing of your data?

**FUNDACIÓN ASPAYM CASTILLA Y LEÓN**

**Domicilio:** Calle Severo Ochoa, 33

47130 Simancas (Valladolid)

**CIF:** G47537402

**Telephone number:** 91 232 91 29

**Mail:** fundacionrgpd@aspaymcyll.org

You can contact us in any way you wish to communicate with us.

We reserve the right to modify or adapt this Privacy Policy at any time. We encourage you to review it, and if you have registered and are logged in to your account or profile, you will be informed of any changes.

### Interested groups

If you are one of the following groups, please consult the following information:

#### Web or e-mail contacts

##### What data do we collect through the website?

We may process your IP address, what operating system or browser you use, and even the duration of your visit, anonymously.

If you provide us with data in the contact form, you will be identified so that we can contact you, if necessary.

##### For what purposes will we process your personal data?

- Respond to your queries, requests or petitions.
- Manage the requested service, answer your request, or process your request.
- Information by electronic means, related to your request.
- Commercial or event information by electronic means, provided that express authorisation has been given.
- To carry out analysis and improvements on the Web, about our products and services. To improve our commercial strategy.

##### What is the legitimacy for the processing of your data?

The acceptance and consent of the interested party, granted through a voluntary action, as in cases where to make a request it is necessary to fill in a form and click on the send button, the completion of the same will necessarily imply that he/she has been informed and has expressly given his/her consent to the content of the clause attached to the form or acceptance of the privacy policy.

All our forms have the symbol \* in the obligatory data. If you do not provide these fields, or do not tick the checkbox for acceptance of the privacy policy, we will not allow the information to be sent.

How long will we keep personal data? Until the revocation of the consent given.

## Newsletter contacts

### What data do we collect through the newsletter?

On the Web, you can subscribe to the Newsletter, if you provide us with an email address, to which it will be sent.

We will only store your email address in our database, and we will proceed to send you periodic emails, until you unsubscribe, or we stop sending emails.

You will always have the option to unsubscribe, in any communication.

### For what purposes will we process your personal data?

- Manage the requested service.
- Information by electronic means, related to your request.
- Commercial or event information by electronic means, provided that express authorisation has been given.
- To carry out analyses and improvements in the sending of mailings, in order to improve our commercial strategy.

### What is the legitimacy for the processing of your data?

The acceptance and consent of the interested party. In those cases where you subscribe, it will be necessary to accept a checkbox and click on the send button. This will necessarily imply that you have been informed and have expressly given your consent to receive the newsletter.

### How long will we keep personal data?

Until revocation of the consent given.

## Clients

### For what purposes will we process your personal data?

- Elaboration of the budget and its follow-up by means of communications between both parties.
- Information by electronic means, related to your request.
- Commercial or event information by electronic means, provided that express authorisation has been given.
- To manage the administrative, communications and logistics services carried out by the Responsible Party.
- Invoicing and declaration of the appropriate taxes.
- Carrying out the corresponding transactions.
- Control and collection procedures.

### What is the legitimacy for the processing of your data?

The existence of a contractual relationship between the parties. The

processing is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures at the request of the data subject.

#### How long will we keep personal data?

For the duration of the relations between the parties and for the limitation periods arising therefrom.

### Quality surveys

#### For what purposes will we process your personal data?

- To assess the degree of quality in the service provided.
- Improve the services offered, by virtue of ISO compliance

#### What is the legitimacy for the processing of your data?

The legal basis is the express consent of the respondent.

#### How long will we keep personal data?

Until revocation of the consent given.

### Suppliers

#### For what purposes will we process your personal data?

- Information by electronic means, related to your request.
- Commercial or event information by electronic means, provided that express authorisation has been given.
- To manage the administrative, communications and logistics services provided by the Controller.
- Invoicing.
- To carry out the corresponding transactions.
- Invoicing and declaration of the appropriate taxes.
- Control and collection procedures.

#### What is the legitimacy for the processing of your data?

The legal basis is the acceptance of a contractual relationship, or alternatively your consent to contact us or offer us your products by any means.

#### How long will we keep personal data?

For the duration of the relations between the parties and for the limitation periods arising therefrom.

### Partners

#### For what purposes will we process your personal data?

- Organisation of the actions necessary to achieve the company's objectives.
- Internal management and legal compliance.
- Calling meetings.
- Carrying out the corresponding transactions.
- Filing the appropriate tax returns.

#### What is the legitimacy for the processing of your data?

The legal basis is contractual, the acceptance of a contract either for the purchase and sale of shares or similar, or participation in the incorporation of the company.

### How long will we keep personal data?

For the duration of the relations between the parties and for the limitation periods arising therefrom.

## Associated partners

### For what purposes will we process your personal data?

- Organisation of the actions necessary to achieve the aims of the association.
- Internal management and legal compliance.
- Convening meetings.
- Carrying out the corresponding transactions or collection of fees.
- Declaration of the appropriate taxes.

### What is the legitimacy for the processing of your data?

The legal basis is contractual, the acceptance of the provisions of the founding act and the statutes of the Association.

### How long will we keep personal data?

For the duration of the relations between the parties and for the limitation periods arising therefrom.

## Social media contacts

### For what purposes will we process your personal data?

- Answer your queries, requests or petitions.
- Manage the requested service, answer your request, or process your request.
- To interact with you and create a community of followers.

### What is the legitimacy for the processing of your data?

The bases that legitimise the processing is the voluntary consent of the interested party to contact and, where appropriate, the acceptance of a contractual relationship in the corresponding social network environment. The processing of data within the Social Network will be carried out in accordance with its privacy policies.

### How long will we keep personal data?

We can only consult or unsubscribe your data in a restricted way when you have a specific profile. We will treat them for as long as you let us by following us, being friends or by "liking", "following" or similar buttons.

Any rectification of your data or restriction of information or publications must be done through the configuration of your profile or user in the social network itself.

## Demandantes de empleo

### For what purposes will we process your personal data?

- Organisation of selection processes for the recruitment of employees.
- To call you for job interviews and evaluate your candidacy.
- If you have given us your consent, we may pass it on to partner or related companies for the sole purpose of helping you find a job.
- If you tick the checkbox to accept the privacy policy, you give us your



consent to transfer your job application to the entities that make up the group of companies for the purpose of including you in their recruitment processes.

We also inform you that one year after receipt of your curriculum vitae, we will proceed to its secure destruction.

#### What is the legitimacy for the processing of your data?

The legal basis is your unambiguous consent by sending us your CV.

#### How long will we keep personal data?

For a minimum period of 1 year or until revocation of the consent given.

### Do we include personal data of third parties?

No, as a general rule we only process the data provided to us by the owners. If you provide us with data of third parties, you must inform and request their consent beforehand, otherwise you exempt us from any liability for failure to comply with this requirement.

### Do we include data on minors?

We do not process data of children under 14 years of age. Therefore, please refrain from providing them if you are not of that age or, where appropriate, from providing data of third parties who are not of the aforementioned age. FUNDACIÓN ASPAYM CASTILLA Y LEON disclaims any liability for failure to comply with this provision.

### Will we communicate electronically?

- They will only be made to process your request, if it is one of the means of contact you have provided us with.
- If we send commercial communications, they will have been previously and expressly authorised by you.

### What security measures do we apply?

You can rest assured: We have adopted an optimal level of protection for the Personal Data we handle, and we have installed all the technical means and measures at our disposal according to the state of technology to prevent the loss, misuse, alteration, unauthorised access and theft of Personal Data.

### To which recipients will your data be communicated?

Your data will not be disclosed to third parties, unless legally obliged to do so. Specifically, they will be communicated to the State Agency of Tax Administration and to banks and financial institutions for the collection of the service provided or product purchased, as well as to the data processors necessary for the execution of the agreement.

In case of purchase or payment, if you choose any application, website, platform, bank card, or any other online service, your data will be transferred to that platform or will be

processed in their environment, always with maximum security.

When we order it, the web development and maintenance company, web hosting/hosting, will have access to our website. They will have signed a service contract that obliges them to maintain the same level of privacy as we do.

## What rights do you have?

- To know whether or not we are processing your data.
- To access your personal data.
- To request the rectification of your data if it is inaccurate.
- To request the deletion of your data if they are no longer necessary for the purposes for which they were collected or if you withdraw your consent.
- To request the limitation of the processing of your data, in certain cases, in which case we will only keep them in accordance with the regulations in force.
- To submit your data, which will be provided to you in a structured, commonly used or machine-readable format. If you prefer, we can send them to the new data controller you designate. This is only valid in certain cases.
- To file a complaint with the Spanish Data Protection Agency or competent supervisory authority if you believe that we have not dealt with you correctly.
- To revoke consent for any processing for which you have consented, at any time.

If you change any data, please let us know so that we can keep them up to date.

## Do you want a form for exercising your rights?

- We have forms for the exercise of your rights, ask us for them by email or if you prefer, you can use those prepared by the Spanish Data Protection Agency or third parties.
- These forms must be signed electronically or be accompanied by a photocopy of your ID card.
- If you are represented by someone else, you must attach a copy of their ID card, or have them sign it electronically.
- The forms can be submitted in person, by letter or by mail to the address of the Responsible at the beginning of this text.

## How long does it take to get back to you on the Exercise of Rights?

It depends on the law, but at the most within one month from your request, and two months if the issue is very complex and we notify you that we need more time.

## Do we use cookies?

If we use other types of cookies that are not necessary, you can consult the cookie

policy in the corresponding link at the top of our website.

## How long will we keep your personal data?

- Personal data will be kept for as long as you remain connected with us.
- Once you disengage, the personal data processed for each purpose will be kept for the legally stipulated periods, including the period in which a judge or court may require them in accordance with the statute of limitations for legal actions.
- The data processed will be kept until the aforementioned legal periods expire, if there is a legal obligation to keep them, or, if there is no such legal period, until the interested party requests their deletion or revokes the consent granted.
- We will keep all information and communications relating to your purchase or the provision of our service, for the duration of the guarantees of the products or services, in order to attend to possible claims.