BASIC DATA PROTECTION INFORMATION	
Controller	PROMOINMO, S.L.
Purpose	To attend the diverse requests submitted by the user.
Legitimation	Data subject's consent.
Recipients	Other companies in the group. Data processors inside or outside the EU, under the "PrivacyShield"
Rights	To access, rectify and erase data, as well as other rights, as explained in the additional information +info
Additional information	For further and detailed information on Data Protection, please visit our website: www.promoinmo.com

## 2. Additional information

The present Data Protection Policy regulates the processing of personal data provided by the User through the Internet website (hereinafter, the "Website"). that PROMOINMO, S.L. makes available to Internet users. This Policy is part of the Legal Notice accessible at all times from the Website.

The User guarantees that the information provided is true, accurate, complete and up to date, and is liable for any damage or injury, direct or indirect, that may be caused as a result of the breach of such obligation. In the event that the data provided belonged to a third party, the User guarantees that he/she has informed the third party of the aspects contained in this document and has obtained his/her authorization to provide his/her data to PROMOINMO, S.L. for the purposes stated.

The Website may offer features for sharing content through third-party applications, such as Facebook or Twitter. These applications can collect and process information related to the user's navigation on the different websites. Any personal information collected through these applications may be used by third party users of these applications, and their interactions are subject to the privacy policies of the companies providing the applications.

The Website may host blogs, forums, and other social networking applications or services in order to facilitate the exchange of knowledge and content. Any personal information provided by the user may be shared with other users of that service, about whom PROMOINMO, S.L. has no control whatsoever.

In order to offer information or services of interest depending on the location of the User, PROMOINMO, S.L. will be able to access data related to the geolocation of the User's device, in those cases in which the user's configuration for this purpose allows it.

For technical safety and system diagnostics purposes, in an anonymized or aggregated form, PROMOINMO, S.L. will be able to record the IP address (the Internet access identification number of the device, which allows devices, systems and servers to recognize and communicate with each other). Such information may also be used for web performance analysis purposes.

## 2.1. Who is responsible for the processing of the User's personal data?

Identity: PROMOINMO, S.L. and CIF B58346255 Mailing Address: C/ Nàpols, 10, 08018, Barcelona Phone number: 933569835 E-mail address: info@promoinmo.com

## 2.2.1. ¿What kind of data do we deal with about the user?

PROMOINMO, S.L. deals with the following user data:

- Identifying data
- Electronic address

## **2.2.** For what purpose do we process the User's personal data?

PROMOINMO, S.L. treats the information provided by the User in order to meet the various requests made by the User. Depending on the nature of the application, the purpose will be to manage:

- a. Consultations and requests for proposals (RFP) sent through the contact form provided for this purpose.
- b. Participation in blogs, through comments, social networks.
- c. Communications through the Ethics Line or Whistle-blowing Hotline, (v) surveys.
- d. Electronic communications of an informative nature, according to your interests.

PROMOINMO, S.L. may draw up a commercial profile based on the information provided. No automated decisions will be made based on that profile.

In the event that the User registers on the Website through the social login, PROMOINMO, S.L. will only access the User's personal data for which he/she has given his/her consent during the configuration of the access to the social network in question. Any information provided in connection with such social applications may be accessed by members of the relevant social network, such interactions will be governed by the privacy policies of the entities providing the services. PROMOINMO, S.L. has no control over or responsibility for such entities or their use of user information.

# 2.2.1. Information about data processing for sending communications from PROMOINMO, S.L.

The data used, or provided, in informative and/or promotional communications are processed by PROMOINMO, S.L. for the purpose of sending information and communications electronically on services, activities, publications and events and on the professionals of PROMOINMO, S.L. or the monitoring and optimisation of marketing campaigns carried out using technologies for this purpose; and the preparation of profiles for commercial purposes.

The consent in order to send such communications may be revoked at any time in any moment in each of the communications received through the mechanism provided for that purpose.

The criteria for storing the data will be based on the statement contrary to the processing by you. In any case, you may exercise your rights of access, rectification, limitation, erasure, portability and opposition by sending your request to the postal address indicated above or by e-mail to the following address info@promoinmo.com.

## 2.3. How long will we keep the User's personal data?

In general, the personal data provided will be kept for the time necessary to comply with the User's request or for as long as the User does not request its deletion. In the specific case of curricula, the data will be kept for a maximum period of three years, unless otherwise indicated by the interested party.

## 2.4. What is the legitimacy for the processing of the User's personal data?

The legal basis for the processing of the data is the legitimation by consent of the User.

## 2.5. To which addressees will the User's personal data be communicated?

In those cases in which the User requests, through the website, service proposals or CVs, his/her data will be provided to those Spanish companies affiliated to the PROMOINMO, S.L. network.

In those cases where the User's request so justifies, the identification data may be provided to other entities affiliated to the PROMOINMO, S.L. network, including those

located outside the European Economic Area, for the sole purpose of meeting the request linked to the country of destination.

Likewise, the data may be transferred to administrations and public bodies for the fulfilment of obligations directly due to PROMOINMO, S.L..

## 2.6. What are the User's rights when providing us with his/her personal data?

The User has the right to obtain confirmation as to whether PROMOINMO, S.L. processes personal data concerning him or her, as well as to access his or her personal data, to request the rectification of inaccurate data or, where appropriate, to request their deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected.

In certain circumstances, the User may request the limitation of the processing of his/her data, in which case they will only be kept for the exercise or defence of claims.

In certain circumstances and for reasons related to his particular situation, the User may object to the processing of his data. PROMOINMO, S.L. shall cease the processing of the data, except for compelling legitimate reasons, or the exercise or defence of any possible claims.

The User may raise the questions he or she considers in relation to this Policy as well as exercise his or her rights under the terms established by law by sending a letter by post to: PROMOINMO, S.L., C/ Nàpols, 10, 08018, Barcelona, or by e-mail to: info@promoinmo.com indicating the corresponding request and accompanied by a copy of the ID card or document proving identity.