

PRIVACY POLICY

Following the principles of legality, loyalty and transparency, we make this Privacy Policy available to you.

Who is the person in charge of processing your data?

The data will be processed by the companies that make up GRUPSA. In order to comply with article 5, 12 and 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the treatment of personal data and the free circulation of these data (hereinafter, "RGPD") as well as article 11 of Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (hereinafter, "LOPDGDD"), those responsible for the treatment depending on the treatment carried out are the following companies, which in common will be called "GRUPSA":

- Company name: GRUPSA GLOBAL, S.L.
- VAT: B82635905
- Tratamiento: international clients
- Company name: GRUPO METAL SYSTEM, S.A.
- VAT: A78558897
- Treatment: national clients
- Company name: SERVIGROUP KIRA, S.L
- VAT: B83551200
- Treatment: maintenance of national clients
- Company name: ROMAYO, S.A.
- VAT: A81585382
- Treatment: national clients

Registered office common to all companieS: Ctra. M – 404, Km. 20 - 28971 Griñón (Madrid)

Contact:

- Telephone: +34 918 140 502
- E-mail: <u>lopd@grupsa.com</u>



For what purpose do we process your personal data?

At GRUPSA, depending on the category of interested party in question, we will process the information you provide us on this website for the following purposes:

INTERESTED	PURPOSES OF TREATMENT
POTENTIAL CUSTOMERS	Manage the potential commercial and/or professional relationship; manage the sending of requested information and/or resolve the queries raised; facilitate offers of our services and/or products of interest to you.
CUSTOMERS	Manage the commercial and/or professional relationship; facilitate offers of our services and/or products of interest to you.
SUPPLIERS	Manage the commercial and/or professional relationship.
CANDIDATES	Manage the personnel selection process.

What is the legitimacy for the treatment of your data?

The legal basis for the processing of your personal data, depending on the category of interested party in question, may be:

INTERESTED	LEGAL BASE
POTENTIAL CUSTOMERS	Art. 6.1.b) RGPD: application, at the request of the interested party, of pre-contractual measures (quotes, order sheets, service offers, etc.)
	Art. 6.1.f) RGPD: Legitimate interest (send requested information, respond to queries raised, etc.)
	Art. 6.1.a) RGPD: consent of the interested party (facilitate offers of our services and/or products).
CUSTOMERS	Art. 6.1.b) RGPD: execution of a contract in which the interested party is a party.
SUPPLIERS	Art. 6.1.b) RGPD: execution of a contract in which the interested party is a party.
CANDIDATES	Art. 6.1.a) RGPD: consent of the interested party.



The data that we request is adequate, pertinent and strictly necessary and in no case are you obliged to provide it to us, but its non-communication may affect the purpose of the service or the impossibility of providing it.

How long will we keep your personal data?

Your data will be kept for the minimum time necessary for the correct provision of the service offered, as well as to meet the responsibilities that may arise from it and any other legal requirement.

To which recipients will your data be communicated?

GRUPSA will not communicate your data to any third party, unless expressly informed of it.

Additionally, we inform you that certain data, by virtue of current regulations or the contractual relationship you maintain with us, may be communicated to:

- Banks and financial entities for the collection of contracted services.
- public administrations with competence in the sectors of GRUPSA's activity, when so established by current regulations.

What are your rights when you provide us with your data?

The data protection rights of the interested parties are:

- Right to request access to personal data relating to the interested party.
- Right of rectification or deletion.
- Right of opposition.
- Right to request the limitation of your treatment.
- Right to data portability.

The holders of the personal data obtained may exercise their personal data protection rights by sending a written communication to the registered office of GRUPSA or to the email provided for this purpose (lopd@grupsa.com), including in both cases a photocopy of their National Document. Identity Card (DNI) or other equivalent identification document.

Models, forms and more information available about your rights on the website of the national control authority, the Spanish Data Protection Agency, (hereinafter, "AEPD"). More information on their website: <u>www.aepd.es</u>



Can I withdraw consent?

You have the possibility and the right to withdraw the consent for any specific purpose granted at the time, without affecting the legality of the treatment based on the consent prior to its withdrawal.

Where can I complain if I consider that my data is not being processed correctly?

If any interested party considers that their data is not treated correctly, GRUPSA can direct their claims to the email <u>lopd@grupsa.com</u> or to the corresponding data protection authority, the AEPD being the one indicated in the national territory. More information about the AEPD at: <u>www.aepd.es</u>

Security and update of your personal data

In order to safeguard the security of your personal data, we inform you that GRUPSA has adopted all the necessary technical and organizational measures to guarantee the security of the personal data provided. All this to prevent its alteration, loss, and/or unauthorized treatment or access, as required by law, although absolute security does not exist.

It is important that, so that we can keep your personal data up to date, you inform us whenever there is a change in them.

Confidentiality

GRUPSA informs you that your data will be treated with the utmost care and confidentiality by all personnel involved in any of the processing phases. We will not transfer or communicate your data to any third party, except in the cases provided by law, or unless the interested party has expressly authorized us.