

J.Y. HERNANDEZ-CANUT

• • • • • BUFETE DE ABOGADOS

EDIFICIO FEYGON, 7° E · P° CASTELLANA 144 · 28046 MADRID

PERSONAL DATA TREATMENT POLICY

In J.Y. HERNÁNDEZ-CANUT BUFETE DE ABOGADOS, S.L.P. we are committed to ensuring that your personal data is protected and not used improperly. By providing us with your personal data, we understand that you have read and understood the terms and information related to the personal data protection below detailed.

J.Y. HERNÁNDEZ-CANUT BUFETE DE ABOGADOS, S.L.P. undertakes the responsibility of complying with current Spanish national legislation –Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y Garantía de Derechos Digitales (LOPD-GDD)– and European legislation on data protection –Regulation (EU) 2016/679, of April 27, 2016 (GDPR)– and has the objective of treating the data in a lawful, fair and transparent manner.

Who is responsible for the processing of your data?

Identification: J.Y. HERNÁNDEZ-CANUT BUFETE DE ABOGADOS, S.L.P.

Postal Address: Doctor Fleming, 1- 8° E, 20836 Madrid (España)

Telephone number: 914576000

Email: abogados@hcanut.com

With what purposes do we process personal data?

- Treatment given to customer personal data:
 - Purposes of contractual nature: The contracting, maintenance and fulfillment of contracts for the provision of legal advisory services, legal defense and associated services.
 - Purposes based on the compliance with legal obligations: Compliance with legal obligations, especially in accounting and tax matters.
- Treatment given to supplier personal data:
 - Purposes of a contractual nature: The contracting, maintenance and fulfillment of contracts for the provision of services signed with the entity above indicated.
 - Purposes based on the compliance with legal obligations: Compliance with legal obligations, especially in accounting and tax matters.

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- Treatment given to candidates personal data:
We treat candidates personal data in order to be included in personnel selection processes that may open up.

In general, the data will be kept while there is a mutual interest to maintain the relationship that originated each particular processing, or until the affected individual exercises its right to suppress, cancel or oppose the data processing, provided that the maintenance of the data is not necessary to comply with legal obligations, and all this without prejudice to the obligation to comply with the legal prescriptions and limitations for the controllers that may arise from each of the relationships we maintain with the affected individuals.

What is the legitimacy for the data processing?

The processing is necessary for the execution of the contracts in which the affected individuals act as a party or for the application, at the latter's request, of pre-contractual measures, as well as for the compliance with legal obligations applicable to J.Y. HERNÁNDEZ-CANUT BUFETE DE ABOGADOS, S.L.P. as controller –article 6 1b) c) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, (GDPR)

The refusal to provide any information of a personal nature considered mandatory may result in a limitation to the provision of the services offered with their due precision and punctuality or, in certain cases, the impossibility of providing them.

With who do we share or transfer data to?

We will only share the data upon the instructions given by the affected individual or when it may be required by competent public authorities, such as the Tax Agency, Social Security, Judges and Tribunals, National Securities Market Commission or the Money Laundering Prevention Service, as long as there is a legal obligation to provide them.

Notwithstanding the foregoing, in some cases J.Y. HERNÁNDEZ-CANUT BUFETE DE ABOGADOS, S.L.P. contracts the provision of services, such as IT maintenance services, messaging services, document management services and tax and accounting advisory services with different companies that may have access to personal data. We follow strict selection criteria in our service providers in order to comply with our data protection obligations, and we are committed to signing the corresponding data processing contract with them.

What are the data subject rights concerning the data they provide us with?

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Those affected individuals can exercise the rights to:

- Access the personal data related to them;
- Rectify inaccurate data;
- Erasure, among other reasons, when the data is no longer necessary for the required purposes;
- Opposition, in which case we will stop processing the data except for compelling legitimate reasons or for the exercise or defense against possible claims;
- Limitation of treatment, in certain circumstances, in which case we will only keep them for the exercise or defense against claims;
- Revoke or withdraw the consent given, at any time and without affecting the lawfulness of the treatment based on the consent prior to its withdrawal;
- Not being the subject of a decision based solely on the automated processing of data;
- Portability of their data to others responsible, in which case data will be kept for the sole purpose of exercise or defense against possible claims.

You may exercise these rights, in accordance with current legislation, by sending an email or by mail at the address indicated in the heading. You must attach a copy of your ID or other documentation that credits your identity.

The response period for the exercise of these rights is one month, from the reception of the message.

You may obtain additional information about these rights or file a claim (especially when you consider that your rights have not been accordingly considered) before the Spanish Agency for data protection. You may find all the necessary information for this purpose at: www.aepd.es

How have we obtained the data?

All personal data we process has been collected using the information provided to us when contracting or contacting us.

The categories of the data we may process are the following:

- Identifying data
- Personal characteristics data

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- Data of social circumstances
- Academic data and professions
- Job Details
- Commercial information
- Postal or electronic addresses
- Economic, financial and insurance data
- Transaction data
- Specially protected data is not processed.

Where can additional information be gathered?

For additional information you may contact us at abogados@hcanut.com