

## **1- WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?**

The Data Controller of your personal data and owner of the website: [www.plusfelt.com](http://www.plusfelt.com) is Plusfelt, SL (hereinafter, PLUSFELT or the Company), with its registered offices in C/ Tordera S/N 17451, Sant Feliu de Buixalleu – Girona and with Spanish Tax ID No. (CIF): B60654340, and registered in the Mercantile Registry of Girona.

PLUSFELT has taken all necessary technical and organisational measures to comply with the requirements of the current data protection regulations, in particular to the General Data Protection Regulation of the EU.

### **PLUSFELT, SL Contact Data**

**Telephone:** (+34 ) 972 86 50 55

**E-mail address:** [info@plusfelt.com](mailto:info@plusfelt.com)

## **2- WHAT TYPE OF PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSE?**

### 1- Types of personal data that we process

2.1. General. We may collect and process the following personal data categories:

1. Name, title, gender.
2. Your contact details, personal account or registration details, as well as your company name and business location including the address, phone number, Spanish Tax ID No. (CIF) and your e-mail address.
3. Information on your requests and purchases.
4. To communicate with you.  
We record your correspondence with us via e-mail or other methods. When you call us by telephone, our customer service department makes a record of your questions or complaints in our database. If appropriate, we may also record the telephone call, which we would inform you of beforehand.
5. Information collected when you use our websites and other digital media, if applicable.  
When you visit our websites, we may record your IP address, browser type, operating system, source website, and web browsing behaviour.

### 2- Your personal data will only be used for the following purposes:

1. To carry out the necessary commercial and administrative arrangements with the users of the website and our customers.
2. To contact you for contractual negotiations and to process your enquiries.
3. In the event that we enter into contracts, make purchases or sales, the data is used to process the corresponding contracts. In this regard, your data may be shared with a contracted carrier and, if necessary, your payment data may be shared with the corresponding financial institution.

4. In the event that you are a PLUSFELT customer, we may send you commercial information related to the products purchased or the services you have contracted.
5. To communicate with you to respond to your enquiries and to process your complaints.
6. To communicate with you to obtain your opinion on the service provided or the quality of our products.
7. Similarly, the data collected while you are browsing our website is processed with the objective of providing access to the online contents of the web, as well as to attend to the requests of the website's users, to keep a register of the statistics of the visits (IP addresses, data regarding the browser, country, page accessed, etc.) in order to help us develop better services and products, optimise our offer, and provide more effective customer service as well as improve the design and content of our websites.
8. The customers and/or suppliers' data will be processed, within the contractual relationship that links them to the data controller, in fulfilment of the administrative, tax, accounting and employment obligations that are necessary under the current legislation.
9. Objection or revocation. You may object to or revoke your consent to receive marketing correspondence at any time by following the instructions in the relevant marketing correspondence or by contacting us at [info@plusfelt.com](mailto:info@plusfelt.com).
10. In the event of filling in any of the forms provided on our website or in any other format, it will be necessary to provide certain personal data, which will be processed for the purpose for which it is requested.
11. Our employees' personal data will be used to comply with the corresponding employment and contractual obligations.

In accordance with the Law on Information Society and Electronic Commerce Services (LSSICE in its Spanish Acronym), we inform you that PLUSFELT does not send SPAM or any commercial correspondence by e-mail if it does not have the necessary legal basis. In any case, you will always have the possibility to withdraw your consent for receiving our correspondence.

We will not process at your personal data for any other purpose other than those described except due to legal obligation or court injunction.

You will not be subject to decisions based on automated processing that have any effect on your data.

### **3- WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?**

The legal basis that legitimises the processing of your personal data is your express consent provided to carry out the purposes described above, and which will be requested when you ask us for information, or by checking the box for the collection of your data on any of our personal data collection forms.

In the event of there being a commercial relationship between the User, customer, supplier or employee and PLUSFELT, the legal basis that legitimises the processing of their personal data will be the execution of the contractual relationship that will have been generated, as well as, where applicable, the fulfilment of the corresponding legal obligations.

If you do not provide us with your personal data or if you do not accept this privacy policy, PLUSFELT will not carry out the processing of your personal data, however, this may also mean that you cannot receive information about PLUSFELT's products and services, or, where applicable, improve the contractual relationship between you and PLUSFELT.

### **Commercial Information.**

Any correspondence sent will be incorporated into PLUSFELT's information systems.

In the event that the User provides us with their personal data and accepts this privacy policy, they expressly consent to PLUSFELT, S.L. carrying out the following activities and/or actions, unless the User indicates otherwise:

- The sending of commercial and/or promotional correspondence in response to their request for information by any methods which they have provided us with.
- The sending of any information, including commercial information about news, new features, fairs, etc., as well as all information related to our activities and the products purchased or the services contracted by our customers.

The User is informed that the methods enabled by the company to communicate with customers and other interested parties are the corporate land line and mobile telephones and the corporate or customer e-mail service provided on our Website.

If you send personal information by a method of communication other than those indicated on this website or by any other methods provided by PLUSFELT, PLUSFELT will be waived from liability in relation to the security measures provided by the method in question.

### **Curricula Vitae**

In the event that the User sends their CV to PLUSFELT, we inform the user that the data provided will be processed so the user can participate in any selection processes that may be carried out, performing an analysis of the applicant's profile with the aim of selecting the best candidate for the vacant post at PLUSFELT. Please note that we will only accept your CV if you submit it electronically, therefore any paper copies of CVs which are sent or handed in will not be accepted. In the event of any change in the data, please inform us in writing as soon as possible, in order to keep your data up-to-date.

We inform you that your CV and the data it contained in it will be kept for a maximum period of one year, after which we will proceed to delete the said data, thus guaranteeing total respect of confidentiality both in the processing as well as in its subsequent destruction. In this regard, after the aforementioned period, and if you wish to continue participating in PLUSFELT's selection processes, please send us your CV again.

If, however, you are employed by PLUSFELT, your CV will be retained, along with the rest of your employment record, for as long as your contractual relationship with the Company continues.

#### **4- CONSERVATION PERIOD How long will we keep your data for?**

The personal data you provide us will be retained for as long as is necessary to manage the information you request from us, to arrange product orders you place with us, or to fulfil any contract generated between PLUSFELT and third parties. In the event that we have your identifying information in our database in order to send you commercial information, it will be retained for as long as the necessary legal basis that legitimises its conservation and use remains in place. You may request the erasure of your data at any time so as not to receive any commercial information.

Once the data has fulfilled the needs for which it was collected we will permanently erase it. However, we will retain your data for a longer period if it is necessary to comply with legal obligations. Similarly, it may be necessary to retain them for the time required to comply with the statutory legal liabilities that are generated.

The data you provide to initiate a selection process will be retained for a maximum of one year. Subsequently, if you have not been employed by PLUSFELT or you are not included in a selection process it will be destroyed and we will not retain any copies.

Our employees' personal data will be kept for the duration of their employment relationship with PLUSFELT and subsequently for the legally stipulated periods.

#### **5- TO WHOM WILL YOUR DATA BE COMMUNICATED?**

The categories of recipients to whom your personal data may be communicated are as follows:

1. Third parties assigned to process the data, such as IT providers, consultants and advisers, as well as other companies providing ancillary services.
2. Social network providers, marketing agencies, and fraud detection service providers.
3. Public entities and bodies, exclusively for the purpose of complying with applicable legal obligations.
4. Other providers to whom, where applicable, your personal data may be transferred, such as financial institutions, insurance companies, logistics/transportation service providers, among others.
5. Third-party websites. Our websites are linked to third-party websites. If you click on these links, you will leave our website or mobile applications. This Privacy Policy does not apply to third-party websites. PLUSFELT accepts no liability for the use of your personal data by third parties. The use of these websites is at your own risk.
6. Inversiones Plusfelt, SL. A Company of our Group that carries out PLUSFELT's administration tasks.

In any case, all the above-mentioned third parties will have signed the corresponding confidentiality commitment beforehand, following our instructions in accordance with the regulations in force for the protection of personal data, and will be subject to the duty of professional secrecy and will act in fulfilment of a legal obligation.

The information you provide to us both through this website and through the application will be hosted on PLUSFELT's servers.

## **6.- WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?**

If you wish to exercise the rights granted to you under the data protection regulations, please send us an e-mail to the following address [info@plusfelt.com](mailto:info@plusfelt.com), stating the right you wish to exercise in the subject line and attaching a copy of your national identity card or passport.

The Rights recognised by the regulations in force and which, if any, may be exercised are:

### Right of access to data:

You have the right to have PLUSFELT tell you whether your personal data is being processed, and if the processing is confirmed, you will be able to access it, with the following information being provided:

- The purposes of the processing.
- The categories of data being processed.
- The time limit or criteria for the retention of the data.

### Right of rectification of the data:

You have the right to have PLUSFELT rectify your data when it is inaccurate or incomplete through an additional rectifying statement.

### Right of erasure of the data:

The data subject shall have the right to have PLUSFELT erase their data, when:

- The processing is unlawful.
- The data subject has withdrawn their consent.
- The data is no longer necessary in relation to the purposes for which it was collected or processed.
- The data subject has exercised their right of objection and no other legitimate grounds for the processing prevail.
- The data must be erased in order to fulfil a legal obligation applicable to PLUSFELT.

The data subject will not have the right to have PLUSFELT erase their data when the processing is necessary:

- To exercise the right to freedom of expression and information.
- To fulfil a legal obligation applicable to PLUSFELT.

- For the formulation, exercising or defence of claims.
- In the public's interest based on current legislation for public health reasons or for historical, statistical or scientific research purposes.

#### Right of portability of the data:

You have the right to have PLUSFELT transfer your data to another data controller or to the data subject, using a structured commonly used format and mechanical reading, when the processing is carried out by automated means and is based on:

- The consent of the interested party for specific purposes.
- The execution of a contract or pre-contract with the data subject.

The right to data portability will not apply when:

- The transfer is technically impossible.
- It may adversely affect the rights and freedoms of third parties.
- The processing is for the purposes in the public interest, based on current legislation.

#### Right of restriction of the processing:

The data subject will have the right to object to the processing of their data carried out by PLUSFELT for reasons related to their particular situation, when the processing is based on:

- Direct marketing.
- Profiling.
- The legitimate interest of the data controller or third parties, provided that the interests or rights and freedoms of the data subject do not prevail, especially if the data subject is a child.
- Historical, statistical or scientific research, unless the processing is necessary for reasons of public interest.

Even if the data subject objects to the processing of their data, PLUSFELT may continue to process the said data as long as their legitimate interest prevails over the interests or rights and freedoms of the data subject in a judicial proceeding which justifies it.

PLUSFELT shall inform the data subject of the right to object to the processing of their data explicitly, clearly and separately from any other information, at the time when the first correspondence is sent.

### Right of objection:

This is the right not to have the processing carried out or that it ceases when your consent for the processing is not necessary, due to the concurrence of a legitimate and well-founded reason, referring to your specific personal situation, that justifies it, unless provided otherwise by law.

### Right not to be the subject of profiling:

The data subject will have the right not to be the subject of profiling, the purpose of which is to make individual decisions based on automated data processing and intended to evaluate, analyse or predict the following personal aspects:

- Professional performance.
- Economic situation.
- Health.
- Personal preferences or interests.
- Reliability.
- Behaviour.
- Location or movements of the person.

When the profiling is based only on automated processing:

- The data subject shall have the right to be informed if the decision which may be made could produce any legal effects that significantly affect them.
- The data subject shall have the right to obtain human intervention by PLUSFELT, to express their point of view and to challenge the decision, if the processing has been authorised by:
  - The explicit consent of the data subject.
  - A contract between PLUSFELT and the data subject.

The right not to be the subject of profiling shall not be applied when the decision which may be made as a result of profiling is authorised by:

- The explicit consent of the data subject.
- A contract between PLUSFELT and the data subject.
- Profiling based on current legislation.

## **7- LODGING A COMPLAINT WITH THE CONTROL AUTHORITY:**

If you believe that PLUSFELT has breached any of your rights protected under the Personal Data Protection Regulation or that PLUSFELT has violated any other Personal Data Protection obligations, you have the right to lodge a complaint with the competent control authority, which in Spain is the Spanish Data Protection Agency located at Calle Jorge Juan, 6, 28001 – Madrid.

Tel. 901 100 099 – 912 663 517

Similarly, you can also lodge an electronic complaint through the electronic office which is available on the website <https://www.aepd.es>

## **8- LEGISLATION AND JURISDICTION**

This Privacy Policy is governed by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of the said data.

It is also regulated by Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the Guarantee of Digital Rights. Similarly, our website is regulated by Law 34/2002, of 11 July, on information society and electronic commerce services.

The Users of this Website are subject to Spanish legislation and jurisdiction to which they expressly submit, with the Courts and Tribunals of BARCELONA being the competent authority for the resolution of all conflicts arising from or related to their use.

## **9- ADDITIONAL INFORMATION**

### **SECURITY MEASURES:**

The information you provide to us will be processed confidentially. PLUSFELT has adopted all the technical and organisational measures and all the necessary levels of protection to guarantee the security in the processing of the data and to prevent its alteration, loss, theft, unauthorised processing or access, in accordance with the state of the technology and the nature of the stored data. Similarly, it also guarantees that the processing and registration in files, programs, IT systems or equipment, premises and centres comply with the requirements and conditions of integrity and security established in the current regulations.

### **LANGUAGE**

The applicable language of this Privacy Policy is Spanish. Therefore, in the event of any contradiction in any of the versions provided in other languages, the Spanish version shall prevail.

## **10- UPDATE**

This Privacy Policy was last updated in **October 2020**; however, it may be updated at any time. We recommend that you check it every time you access our Website in case it has undergone any alterations.