

## PRIVACY POLICY

### DATA OF THE DATA CONTROLLER

COMPANY NAME: **LOGÍSTICA SANMIVAL S.L.** (hereinafter, the "COMPANY" or the "CONTROLLER").

CIF: B0938854

ADDRESS: CTRA. MADRID-IRUN KM.245 RECINTO ADUANA VILLAFRÍA BURGOS 09007

PHONE: 947474453

EMAIL for communications regarding Data Protection: info@sanmival.com

**APPLICABLE REGULATIONS:** our Privacy Policy has been designed in accordance with the EU General Data Protection Regulation 2016/679 of the European Parliament and of the Council, of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, Organic Law 3/2018 of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights and Law 34/2002, of 11 July, on information society services and electronic commerce (LSSI-CE).

**LOGÍSTICA SANMIVAL S.L.** may modify this Privacy Policy to adapt it to new legislation, jurisprudence or interpretation of the Spanish Data Protection Agency. These privacy conditions may be complemented by the **Legal Notice**, **Cookies Policy** and, if applicable, the General Conditions that, where appropriate, are included for certain products or services, if such access involves any speciality in terms of personal data protection.

**PURPOSES AND LEGAL BASES FOR THE PROCESSING OF PERSONAL DATA:** At **LOGÍSTICA SANMIVAL S.L.** We collect and process your personal information in general, to manage the relationship we have with you, the main purposes being the following:

**A.** To respond to queries, requests for information, suggestions, professional contact, to process orders, appointments, reservations, demonstrations, requests or any type of request made by the interested party through any of the contact forms that the Data Controller makes available to you on this website or other means. - To manage our commercial relationship. - To send you communications that will refer to products similar to those you previously purchased, as well as news in our products or services that may be of interest to you. - Carry out market studies, statistical analyses, surveys or satisfaction evaluations. **The legal basis is the legitimate interest of the Data Controller.**

**B.** To send you news about our entity, promotions, advertising, newsletters, updates to our catalog of products and services by any electronic or physical means, present or future, that makes it possible to carry out these commercial communications. **The legal basis is the consent of the data subject.**

**C.** Carry out the necessary contractual or pre-contractual procedures with the interested parties for the contracting and provision of the products and/or services offered by the Data Controller and manage, maintain, improve and develop a commercial, commercial or administrative relationship at all levels with our customers, users, suppliers and other interested parties, as well as the correct supervision and execution of the products provided or services provided. **The legal basis is the performance of a contract or pre-contract to which the data subject is a party, as well as compliance with legal obligations applicable to the Data Controller.**

**D.** For the invoicing and accounting of the products or services provided, **the legal basis is compliance with legal obligations.**

**And.** Management of the candidacy of the interested party in the selection processes of the Data Controller in accordance with their professional profile that may arise within the activities of the Data Controller. **The legal basis is the express consent given by means of a positive and affirmative act at the time of providing us with your data.**

**F.** Regarding the use of cookies for different purposes (technical, analytical, etc.) by this website, as specified in the cookies section [that we invite you to consult](#). **The legal basis will be the consent granted for cookies that require it.**

### STORAGE PERIOD OF YOUR DATA:

Personal data processed for purposes **(A), (B), (C)** and **(D)** will be kept for no longer than necessary to maintain the purpose of the processing or there are legal prescriptions that dictate their custody and when it is no longer necessary for this purpose, they will be deleted with appropriate security measures to guarantee the anonymisation of the data or the total destruction of the same.

The personal data obtained for the purpose (E) will be kept for the time necessary for the purpose of the processing or for a maximum of 12 months, after which period they will be blocked or destroyed.

In any case, and as a general rule, we will keep your personal information for as long as there is a commercial, pre-contractual or contractual relationship that binds us to you, comply with legal obligations or until you exercise your right to erasure and/or restriction of processing. In such cases, the information may be blocked without its use beyond its conservation, as long as it may be necessary for the exercise or defence of claims or any type of liability may arise that should be addressed.

In relation to the cookies used (F), as specified in the section dedicated to **cookies** on this website.

**DATA CATEGORIES:** We collect your personal information through different means and in general, the personal information we process refers to the category of identification, contact and financial data, such as: name and surname, NIF, Telephone, Postal Address, Email, payment and billing data, as well as the IP address from which you access the data collection form,

The data processed within the framework of a contractual, pre-contractual, commercial or commercial relationship, may include, in addition to those set out above: data on transactions of goods and services, social circumstances, personal characteristics, commercial, economic, financial and insurance information, legal representative, bank details, manual or electronic signature, professional, academic data or other categories necessary by the nature of the products and services provided by the Responsible Party.

**LOGÍSTICA SANMIVAL S.L.** It uses social media and this is another way to reach you. The information collected through the messages and communications you post may contain personal information that is available online and accessible to the public. These social networks have their own privacy policies where it is explained how they use and share your information, so **LOGÍSTICA SANMIVAL S.L.** You are encouraged to consult them before using them to confirm that you agree with the way your information is collected, processed and shared.

The data collected for purpose (E) will be those of the professional area and contact: name, surname, telephone, e-mail, CV, cover letter and any other personal data associated with the CV or professional profile.

**OBLIGATION TO PROVIDE DATA:** The minimum data that will be requested to accept the communication of an interested party will be the name and surname, the email address or, depending on the means of communication used, the postal address, the username and/or the telephone number. The refusal of the interested party to provide this data may lead to the rejection or return of the communication sent by the interested party and/or the non-attention or resolution of the request, suggestion, complaint or other request of the interested party.

In general, the data provided at the request of the CONTROLLER will be the minimum necessary for the purpose pursued, so its provision is mandatory as it is a contractual requirement for the provision of services or sale of products and/or a legal obligation. The refusal of the interested party to provide the data marked as mandatory will entail the impossibility of adequately providing the services or sale of products, so that the order cannot be formalized or, if it is already formalized, it will be grounds for termination of the corresponding contract for the provision of services or sale of products for reasons attributable to the interested party. In the event of requesting additional data that is not essential to provide the services, the RESPONSIBLE PARTY will indicate this circumstance at the time of the request.

USERS, by ticking the corresponding boxes and entering data in the fields, marked with an asterisk (\*) in contact forms or presented in download forms or similar, expressly, freely and unequivocally accept that their data are necessary to respond to their request, on the part of the provider, the inclusion of data in the remaining fields being voluntary. The USER guarantees that the personal data provided to the CONTROLLER is true and is responsible for communicating any modification thereof.

The data collected for the purpose of managing the interested party's candidacy in the selection processes of the RESPONSIBLE will be necessary for the assessment of their professional profile, in the event that they are incomplete, the RESPONSIBLE may not include them in current or future selection processes, making it mandatory to provide them.

**TRANSFER OF DATA:** no data transfers or international transfers of your data are foreseen, except for those authorised by tax, commercial and telecommunications legislation, as well as in those cases in which a judicial authority or state security forces require us to do so. Identification and financial data may be communicated to banks or payment platform managers, as well as to insurance companies or intermediaries thereof, if necessary to achieve the purposes of the processing.

The interested parties are informed that **LOGÍSTICA SANMIVAL S.L.** has contracted external service providers, with whom we have signed the legally required contracts under which the fulfilment of their obligations as Data Processors is guaranteed.

In the event of transferring your data to third parties for any other purpose, the Data Controller will inform and obtain the consent of the interested party in advance.

In the case of the use of **third-party cookies**, those provided for in the section dedicated to information on "cookies" on this website.

**USER RIGHTS:** Every person in reference to whom personal data is processed has the following rights:

- **Right of access:** allows the interested party to be aware of whether their personal data is being processed, to obtain information regarding the characteristics and scope of the processing carried out and to receive a copy of the data processed.
- **Right of rectification:** allows you to correct errors and modify data that turn out to be inaccurate or incomplete.
- **Right to erasure:** allows data to be deleted, among other cases, when they turn out to be inappropriate or excessive for the purpose of the processing, the consent given is revoked or there is unlawful processing of the same, and provided that none of the cases of necessity of the processing legally provided for as exceptions to the right of deletion occur.
- **Right to object:** allows the data subject, in certain circumstances and for reasons related to their particular situation, to prevent the processing of their personal data. The right to object includes the possibility of the data subject to object, at any time, to the processing of his or her data for the purpose of direct marketing, including profiling.
- **Right to restriction of processing:** allows the data subject to claim, in certain cases, the limitation of processing to data storage operations and to those treatments consented to by the data subject or that are necessary for the formulation, exercise or defence of claims, the protection of the interests of other natural or legal persons, or in the event of the existence of certain reasons of public interest.
- **Right to data portability:** allows you to request that the data processed in an automated manner and by virtue of the consent of the interested party, be delivered in digital format or directly transmitted to a third party responsible for the processing.
- **Right not to be subject to automated individual decisions (including profiling):** allows not to be subject to a decision based on automated data processing that produces legal effects for the data subject or similarly significantly affects him/her, and provided that the automated decision is not necessary for the conclusion or performance of a contract between the data subject and a controller, is authorised by regulations applicable to the data controller or there is the explicit consent of the data subject himself.
- **The right to revoke the consent given to the processing of your data,** which may be exercised at any time. The data subject shall have the right to withdraw their consent at any time, without this affecting the lawfulness of the processing prior to its withdrawal.

Likewise, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, we inform you that you may file a complaint with the national supervisory authority by contacting the **Spanish Data Protection Agency**, C/ Jorge Juan, 6 – 28001 Madrid. ([www.aepd.es](http://www.aepd.es)).

Please clearly indicate, in the letter or in the subject of the email, the mention "EXERCISE OF PERSONAL DATA RIGHTS".

You are informed that the Data Controller has model forms for requesting the different rights available to the interested parties, who can request them by any of the two means provided for the exercise of rights or by telephone and indicating a postal address or an email where they can be sent. The use of these forms is not mandatory.

Likewise, the interested party may, on a voluntary basis, use the forms for exercising the different rights published by the Spanish Data Protection Agency that can be downloaded at the following address:

<https://www.aepd.es/reglamento/derechos/index.html>

**Contact details to exercise your rights:** LOGÍSTICA SANMIVAL S.L. | CTRA. MADRID-IRUN KM.245 RECINTO ADUANA VILLAFRÍA BURGOS 09007 | 947474453 | [info@sanmival.com](mailto:info@sanmival.com)

**HOW DO WE PROTECT YOUR INFORMATION?:** At **LOGÍSTICA SANMIVAL S.L.** We are committed to protecting your personal information. We use physical, organisational and technological measures, controls and procedures that are reasonably reliable and effective, aimed at preserving the integrity and security of your data and guaranteeing your

privacy. In addition, all personnel with access to personal data have been trained and are aware of their obligations in relation to the processing of their personal data.

In the case of the contracts we sign with our suppliers, we include clauses in which they are required to maintain the duty of secrecy with respect to the personal data to which they have had access by virtue of the assignment carried out, as well as to implement the technical and organisational security measures necessary to guarantee confidentiality, Permanent integrity, availability and resilience of personal data processing systems and services.

All these security measures are reviewed periodically to ensure their adequacy and effectiveness. However, absolute security cannot be guaranteed and there is no security system that is impenetrable and, in the event that any information subject to processing and under our control is compromised as a result of a security breach, we will take appropriate measures to investigate the incident, notify the Supervisory Authority and, where appropriate, to those users who may have been affected so that they take the appropriate measures.

**USER'S RESPONSIBILITY:** By providing us with their data, the user guarantees that they are over 14 years of age and that the data provided to the Data Controller are true, accurate, complete and up-to-date. To this end, the user confirms that they are responsible for the veracity of the data communicated and that they will keep this information suitably updated so that it corresponds to their real situation, being responsible for any false and inaccurate data that may be provided, as well as for any direct or indirect damages that may arise.