

# DP 1001 Lleida.net Privacy Policy



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## Document Control

Date	Version	Changes	Author
01/06/2020	1.0	Author	Eva Pané

## Distribution list

Departments
Lleida.net

## Document classification and status

<b>Document classification</b>	Public
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<b>Document status</b>	Approved
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## **1 Introduction**

### **1.1 Purpose**

The purpose of this policy is to establish Lleida .net Management's commitment to the privacy of the personal data it processes.

### **1.2 Scope of Application**

All members of Lleida.net, as well as all third parties identified in the scope of the Information Security Management System (ISMS).

### **1.3 Distribution**

Approved by Lleida.net Steering Committee, this Policy must be accessible to all people included in the distribution list in the documentary control, through the appropriate channels established in the procedure 3001 - Management of the documentation repository.

### **1.4 Review**

However, from the changes relevant to the Organization take place, whether these are operational, legal, regulatory or contractual, they will be revised whenever deemed necessary, thus ensuring that the Policy remains adapted at all times.

## 2 Privacy policy

### 2.1 Scope

LLEIDA.NET undertakes to guarantee the confidentiality of the data provided by the stakeholders. Therefore, in terms of data protection we guarantee compliance with Regulation (EU) 2016/679 of the European Parliament and the Council, of 27 April 2016, (General Data Protection Regulation).

LLEIDA.NET will provide information so that, prior to completing the personal data of the interested party, the latter can access the specific Privacy Policy of the treatment of their data and any other relevant information regarding Data Protection.

### 2.2 Data controller

Data controller contact details: LLEIDANETWORKS SERVEIS TELEMATICS, S.A. tax number A-25345331 registered address at C/General Lacy, 42 bajos – 28045 Madrid (hereinafter, LLEIDA.NET).

### 2.3 Purpose of data processing

LLEIDA.NET undertakes to always use the personal data of the interested parties for specific, explicit and legitimate purposes.

In those cases in which it is intended to carry out a treatment of your personal data for a purpose other than the one that was initially consented by the interested parties, they will be provided with information about the new purpose to obtain, again, their consent.

When, with the personal data of the interested parties, profiles can be elaborated or automated decisions can be made, information will be provided about it and the consequences they may have.

#### On Social networks

LLEIDA.NET has profiles on some of the leading social networks, being responsible for the processing of the data published on them.

The processing that will be carried out with the data within each of the aforementioned networks will be, at most, the one that the social network allows for corporate profiles.

Thus, you can inform, when the law does not prohibit it, its followers by any means by any means permitted by the social network about its activities, presentations, offers, as well as providing personalized customer service.

In no case will LLEIDA.NET extract data from social networks unless the user's consent is promptly and expressly obtained for it.

## 2.4 Legitimacy

The interested party will have full rights to its personal data and to the use thereof and may exercise them at any time.

No data will be transferred to third parties, except legal obligation without having previously obtained their consent for so doing.

The data subject will be specifically informed about the legitimacy of the processing of their data, for example:

- execution of a contract, in case you have signed a contract with LLEIDA.NET and will be informed in the contract itself or in the General Contracting Conditions in case the contracting process has been finalized through the web sites.
- consent, in the cases of contact forms or newsletter subscription on Lleida.net websites.

## 2.5 Recipients

LLEIDA.NET will only transfer the data of the data subject in case of legal obligation and in no case the personal data will be shared with third parties without obtaining their prior consent, unless the transfer of their data is necessary for the maintenance of the relationship, as well as in the cases provided by the data protection regulations in force at any time.

## 2.6 Origin

In the event that the personal data were not obtained directly from the data subject, as a result of a legitimate assignment, or from sources of public access, they will be duly informed by any means that proves that the duty to inform has been fulfilled.

## 2.7 Data Protection Rights

### Procedure for protection rights

Those interested may send a written communication to the registered office of LLEIDA.NET, or send an email to [gdpr@lleida.net](mailto:gdpr@lleida.net) attaching a photocopy of their ID or other identification document, to request the exercise of the following rights:

- Right of access: the data subject shall have the right to obtain from LLEIDA.NET confirmation as to whether or not personal data concerning him or her are being processed.
- Right to rectification and to erase; inaccurate personal data concerning him or her
- The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, in which case LLEIDA.NET shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- In certain circumstances, the data subject shall have the right to data portability, the data subject shall have the right to have the personal data transmitted directly from LLEIDA.NET to another controller, where technically feasible.
- The data subject has the right to ask us to restrict the processing of your personal data in certain circumstances. In this case, LLEIDA.NET will only keep your data for the exercise or defence of claims.
- In certain circumstances, there is the possibility of withdrawing consent: in the event that consent has been granted for a specific purpose, the data subject has the right to withdraw consent at any time, without affecting the legality of the treatment based on consent prior to withdrawal.

### Complaint with a supervisory authority

If a user considers there may be problem with the way LLEIDA.NET is handling its data, it can address to LLEIDA.NET or to the corresponding data protection control authority, being in Spain the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

## 2.8 Security

At LLEIDA.NET we maintain the highest levels of security to protect the personal data of the data subject against loss, destruction, accidental damage and unauthorized or illegal access, treatment, or disclosure. Upon receipt of data, we use rigorous security procedures and features to prevent any unauthorized access.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, LLEIDA.NET shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

The actions described in this section and appropriate measures to guarantee an adequate level of security for the risk detected will include, inter alia as appropriate:

1. The pseudonymization and encryption of personal data, where necessary.
2. the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.
3. the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
4. a process for regularly testing, assessing, and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
5. Periodic assessment of the risk of destruction to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed;
6. The processor and any person acting under the authority of LLEIDA.NET , who has access to personal data, shall not process those data except on instructions from LLEIDA.NET.

## **2.9 Confidentiality**

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

## **2.10 Responsibility**

The user will be solely responsible due to filling out forms with false, imprecise, incomplete, or out-of-date data.

## **2.11 Cookies**

Lleida.net websites use cookies, which are small data files that are generated on the user's or client's computer and that allow our systems to remember the language and portal chosen, as well as other features or browsing preferences of the user in his/her first session.

The user has the option of preventing the generation of cookies, by selecting the corresponding option in their browser program.

For further information about our Cookies Policy, please visit:

### **2.12 Privacy policy amendment**

LLEIDA.NET reserves the right to modify this Privacy Policy, in accordance with its own criteria, driven by a legislative, jurisprudential, or doctrinal change of the Spanish Authorities and the corresponding Agency.

You will be informed about such changes by publishing the modified Privacy Policy on the LLEIDA.NET websites themselves.

### **2.13 Applicable law and jurisdiction**

All disputes and / or claims arising from the interpretation and / or execution of this privacy policy will be governed by Spanish law and will be subject to the jurisdiction of the Courts and Tribunals of the city of Lleida.