

## **INFORMATION NOTICE ON PERSONAL DATA PROCESSING PURSUANT TO ARTICLE 13 AND 14 OF EU REGULATION NUMBER 679/2016**

### **Data Subjects: employees of customers, potential customers and suppliers**

Throughout the valid term of a contract entered into with its own customers and suppliers, during inspections, verifications or audits, or as a result of commercial relationships, Arconvert S.A. may obtain access to personal data related to the workers of customer companies, suppliers or potential customers (hereinafter referred to as the "Data Subjects"). Pursuant to the regulation in force, Arconvert S.A. provides the following information notice to the Data Subjects, in accordance with Article 13 and 14 of EU Regulation number 679/2016.

#### **Identity and contact details of the data controller**

The Data Controller is Arconvert S.A., with registered office at Carretera de Cartellà, nº 6; 17150 - Sant Gregori (Girona) Spain, C.I.F. ESA17001801A.

For the purpose of exercising the rights stipulated in the Regulation and for any query you may have regarding your personal data, you can contact the Data Controller by sending a registered letter to the aforementioned address, or a message to the following email address: [gdpr@arconvert.es](mailto:gdpr@arconvert.es)

#### **Purposes of the processing to which the personal data are subject**

Arconvert S.A. processes the Data Subjects' personal data for the purpose of executing the agreement entered into with the holder of the work relationship or carrying out inspection, verification or audit activities before or after the execution of the agreement, as well as executing the existing commercial relationship.

#### **Legal basis of the processing**

The Data Subjects' personal data must be processed due to the legitimate interests of the company that has drawn up these information notices and, in particular, to execute the agreement entered into by Arconvert S.A. and the organisation to which the worker belongs, either within the scope of the negotiations to enter into the agreement or for the purpose of conducting inspections, verifications or audits.

#### **Categories of personal data subject to processing**

General personal data will be processed (data related to the work relationship, the professional post, identification and tax information, contact details, etc.), to the extent that this is strictly required for the specified purposes.

#### **Possible recipients or categories of recipients of the personal data**

Personal data may be disclosed to the employees of Arconvert S.A. that are authorised to carry out data processing and/or third parties that are duly appointed as Data Processors, such as factoring companies, debt recovery companies, credit insurance companies, manufacturing companies and/or companies that grant licences to use possible services/products supplied, only when such disclosure is necessary and to the extent that it is essential for the specified purposes.



### **Transfer of data to third countries**

At present, Arconvert S.A. does not intend to transfer your personal data to countries outside the European Union.

In any case, if this occurs, Arconvert S.A. guarantees that the data will be transferred to countries outside the EU that, according to the European Commission, ensure an adequate level of protection (Article 45 of the GDPR) or are subject to the standard contractual clauses approved by the European Commission.

The foregoing may only be derogated in the situations stipulated in Article 49 of the GDPR.

### **Term for storing the personal data**

The organisation that has drawn up these information notices will keep the personal data for the valid term of the agreement entered into with the organisation that holds the employment contract and for ten years following the termination of such contract and/or in any case, pursuant to the requirements in the civil, tax and administrative law in force on storing data. The data may be kept for a longer period of time due to petitions received from the Public Authorities or another judicial, government or regulatory body or due to the company that has drawn up these information notices being involved in legal proceedings that imply personal data processing.

The personal data processed by Arconvert S.A. in the stage prior to signing an agreement with the worker's organisation will be kept for the time strictly required for the negotiations and to draw up the contract, as well as for the inspection, verification and audit activities.

### **Rights of the data subject**

The data subjects shall have the right to request that the data controller grant them access to the personal data, free of charge and notwithstanding the rights and freedoms of third parties. In particular, they are entitled to receive confirmation as to whether or not their data are currently being processed, as well as the following information: a) the source of the personal data, when the data have not been disclosed by the data subject; b) the personal data categories; c) the purposes and the methods of the processing; d) the existence of an automated process, including profiling and, in such case, the logic involved, as well as the significance and envisaged consequences of this processing for the data subject; e) the update or rectification of the data; f) the erasure of data or restriction of data processing (making them anonymous, blocking data that were processed in breach of the law, including data that do not need to be stored for the purposes for which they were collected and subsequently processed); g) the recipients or categories of recipients to which the data have been or will be disclosed, specifically if they are to be sent to international organisations or third countries (in the latter case, the data subject is entitled to receive information about the existence of suitable guarantees pursuant to Article 46 on the transfer of data); h) when possible, the envisaged period for which the data will be stored or, if this is not possible, the criteria used to determine this period.

When the Data Subject's consent is required, he/she will be entitled to revoke the consent granted to process the personal data. However, revoking such consent shall not affect the legality of the processing that was carried out based on the consent granted prior to such revocation.

Moreover, the Data Subjects are entitled to data portability and to oppose data processing.

### **The right to file a claim with a supervisory authority**

The data subject is entitled to file a claim with the supervisory authority, represented in Spain by the Spanish Data Protection Authority, with registered office at C/ Jorge Juan, 6. 28001 - Madrid. The data subject may file a claim using the methods he/she considers most convenient: delivered in person, by means of a registered letter with acknowledgement of receipt, by fax or email. For



further information, the data subject is encouraged to visit the website of the Spanish Data Protection Authority at the following address: [www.aepd.es/](http://www.aepd.es/)

**Source of the personal data**

The personal data have been provided by the organisation to which the Data Subject belongs, or directly by the Data Subject.

**Non-existence of an automated decision-making process**

The processing object of this information notice will not be subject to automated decision-making processes that imply significant legal effects for the data subject.