

Data Protection Policy of SEDA OUTSPAN IBERIA, S.L.U.

1. Who is Responsible for treating your data?

SEDA OUTSPAN IBERIA, S.L.U., with a registered address located in Paseo Padre Faustino Calvo s/n 34005 Palencia Palencia (provincia de Palencia) and whose Company Tax Code (CIF) number is B86535002 is responsible for treating data concerning the different processes related to managing our users, clients or providers .

For the purpose of our data protection policy, our contact telephone number is 979716100 and our contact email address is GDPR.Seda@olamnet.com.

2. What kind of information do we have about you and how did we collect it?

The types of personal details that **SEDA OUTSPAN IBERIA S.L.U.** uses about its clients and providers are:

- ✓ Identification data
- ✓ Postal and electronic addresses
- ✓ Commercial information
- ✓ Financial and transaction data
- ✓ Add more categories if there are any

Under no circumstances do we use specially protected data.

All the information mentioned above we have collected either directly from You through contact forms, financial offers, contract proposals, etc; or through your company when they provided us the identification data and all necessary information to fulfill the object of the contract between both parties. It will be either your responsibility or your company's responsibility to provide us with updated information in the case of a change.

3. What do we use the information for?

At SEDA OUTSPAN IBERIA, S.L.U. we treat the information provided by those persons interested, with the aim of managing different activities derived from specific procedures regarding sales, post sale Services, providers' management, Service Quality, etc. Therefore, we will use your details to perform some of the following actions:

- a) Sending the information that is requested from us through the contact forms on our website or through any other means of contact with our company,
- b) Providing our potential clients as well as our clients, with product and service offers that may interest them,
- c) To carry out administrative, legal and accounting duties for our clients and/or providers,
- d) To send satisfaction surveys, market studies, etc. in order to offer the best deals, to improve the quality of the service, etc.

We will not compile market profiles based on the information you provided, and consequently, neither will we make automated decisions about You based on a market profile.

4. How long do we keep your data?

Personal information regarding natural persons associated with potential clients, clients and providers compiled by **SEDA OUTSPAN IBERIA, S.L.U.** through the different contact forms and/or data collection, will be kept as long as its deletion is requested by the interested party. The information provided by our clients and providers will be kept throughout the business relationship between the parties, in any case respecting the minimum legal deadlines for data retention depending on the subject.

In any case, **SEDA OUTSPAN IBERIA, S.L.U.** will retain your personal details during the reasonable period of time required, taking our needs into consideration when it comes to answering the questions sent and solving any issues, make improvements, activate our services and comply with the requirements demanded by the applicable legislation. This means we may retain your personal information during a reasonable period of time, even after you are no longer using our products or no longer browsing our website. After this period, your personal details will be deleted from all the servers at **SEDA OUTSPAN IBERIA, S.L.U.**

5. What is the basis of legitimacy for the treatment of your data?

We have summarized the basis of legitimacy for the mentioned treatment, according to the type of data handling:

TREATMENT	BASIS OF LEGITIMACY
Accounting Management: invoice management with clients and/or providers	Maintenance, development and control of the contractual relationship between the parties.
Financial management: to apply deductions, bonuses, etc.	Maintenance, development and control of the contractual relationship between the parties; Observation of legal commitment.
Administrative management: logistics management, storage, deliveries to the client, receiving merchandise, etc.	Maintenance, development and control of the contractual relationship between the parties.
Marketing: Commercial actions for our products or services, directed at our clients or at those persons who have requested information in the past, including satisfaction surveys to our clients.	Free and unequivocal consent of the interested party (potential clients); we are very clear in stating that the withdrawal of said consent will never condition the execution of the contract that may exist between the parties. Legitimate interest from the company in promoting and marketing products or services similar to those obtained or requested by interested parties in the past.
Treatment of operations with video surveillance for safety reasons: video surveillance system	Legitimate interest of the responsible entity.
Personnel selection management: Curriculum Vitae and academic records of the applicants to cover vacancies within the company	Maintenance, development and control of the contractual relationship between the parties.
Access control for visitors in buildings/offices: Access control to the facilities	Legitimate interest of the responsible entity.
Legal matters/records management:	

Operations for ongoing legal matters (civil, administrative and/or penal)	(Pre)contract execution Regulatory obligation
Preemptive operations concerning risks in the workplace: To comply with the regulations about risks within the workplace	Regulatory obligation
Corporate control operations with timetable control systems: Exercise of the corporate authority of the company with timetable control systems.	Consent of those concerned

As for the basis of legitimacy referred to, You are under the obligation to provide your personal information. In the event that you do not provide your personal details, the contract will not be executed, nor will be the legal or derived obligations from the public authorities.

6. Who will my information be sent to?

SEDA OUTSPAN IBERIA, S.L.U. will never share your personal information with any third party that would use it in their direct marketing actions, except in the event that you plainly authorize us to do so.

We inform you that we can divulge your personal data to organizations of the Public Administration and Authorities in those cases where SEDA OUTSPAN IBERIA, S.L.U. receives a legal demand from either of these Authorities, or in the event that, acting on good faith, we consider that said action is reasonably necessary to comply with an ongoing legal process; to answer any legal claim or demand; or in order to protect the rights of SEDA OUTSPAN IBERIA, S.L.U. or its clients and the general public.

The corporations in our group are located in Spain and abroad, both within and outside the European Union, in countries that, at any rate, offer a data protection level similar to the Spanish one.

7. What are your rights as a concerned or interested party?

Any person has the right to know whether SEDA OUTSPAN IBERIA, S.L.U. is treating personal information that may concern you, or not.

In particular, those persons interested can request the right of access to their personal information, as well as receiving them in a common format and mechanized reading if the treatment takes place through electronic means (right of portability).

Moreover, those persons interested can request the right to rectification for any inaccurate information or, in any case, request they be deleted when, among other reasons, the data is no longer necessary for the purpose they were collected.

Furthermore, in certain circumstances, the interested party will be able to request the limitation in the treatment of their details, or in certain circumstances and for reasons regarding their specific situation; the interested parties may exercise their right to oppose the treatment of their information. SEDA OUTSPAN IBERIA, S.L.U. will no longer use the information, unless there are strong legitimate reasons, or the exercise or the defense of possible claims, or in those exceptions established by the applicable regulations.

Moreover, we inform you that you have the right to withdraw your consent in any moment, and it will not affect the validity of the treatment based on the consent prior to the withdrawal.

Moreover, we inform the User that in any moment they can exercise the aforementioned rights by contacting us in writing using the contact information that appears in the first Paragraph 'Who is Responsible for treating your data' in this document Data Protection Policy of SEDA OUTSPAN IBERIA, S.L.U., including a copy of your DNI. You have also the right to file a claim with the Spanish Data Protection Agency (*Agencia Española de Protección de Datos*), especially if you have not been satisfied in the exercise of your rights.

Agencia Española de Protección de Datos.

C/ Jorge Juan, 6

28001 – Madrid

Telf. 901100099 / 912663517

8. Data Protection for the Users of our Website.

In compliance to the current Regulation (EU) 2016/679, SEDA OUTSPAN IBERIA, S.L.U. informs that the personal details of the Users of the website will be treated for the activity of data handling described in each data collection form in our website, on the part of SEDA OUTSPAN IBERIA, S.L.U. Mentioned treatment of your data will be safeguarded by your own consent. In pressing 'SEND' the User is agreeing to the use of their data by SEDA OUTSPAN IBERIA, S.L.U.

Furthermore, we inform you that, unless there is a legal requirement, or your consent, SEDA OUTSPAN IBERIA, S.L.U. will not divulge your information to third parties. (In the event of divulging any, we will report which information and to whom it has been shared)

Similarly, we inform the User that in any moment they can exercise their rights to access, change or delete their information, as well as other recognized rights in the present document and stated in the Regulation (EU) 2016/679, notified to SEDA OUTSPAN IBERIA, S.L.U., at Paseo Padre Faustino Calvo s/n 34005 Palencia, e-mail: gdpr.Seda@olamnet.com. Conversely, according to the Spanish law *Ley 34/2002*, dated 11th July, for the *Servicios de la Sociedad de Información y de Comercio Electrónico*, SEDA OUTSPAN IBERIA, S.L.U. commits to not send advertisements through email without having the permission of the recipient. The User will be able to deny these advertisements by ticking the appropriate box.

9. Other information of interest regarding our privacy policy

9.1 Security Measures

SEDA OUTSPAN IBERIA, S.L.U. has adopted the security measures required by the current European and Spanish regulations regarding data protection, taking into consideration the technique, the costs of applying it and the nature, scope, context and purposes of the described treatment, as well as the risks, which vary in probability and severity to your rights and freedom as a person.

9.2 Minors data treatment

Protected by the RGPD EU 679/2016 and the RD 1720/2007, minors over 14 years of age can give their consent in contracting services from the information society, as could be subscribing to a forum, completing a contact form, etc. However, SEDA OUTSPAN IBERIA, S.L.U. will be responsible for checking the veracity of the specified age by the party under the legal age.

For the treatment of data from minors younger than 14 years old, the compilation of information will be carried out with the consent of the parents or legal tutors.

9.3 Changes in our Data Protection and Privacy Policy

Occasionally, SEDA OUTSPAN IBERIA, S.L.U. will make changes and corrections in this paragraph of the Data Protection Policy for Employees. Please, check this paragraph regularly in order to stay updated in any modifications that may occur and how they may affect you.

9.4 Why is it necessary to agree to this Data Protection and Privacy Policy?

This paragraph of the Data Protection Policy for Employees will enable you to access all the necessary information in order to know the types of data that SEDA OUTSPAN IBERIA, S.L.U. keeps about potential clients, clients and/or providers, what we aim to achieve, the rights that the data protection regulations

recognize you have as a concerned person and how to exercise those rights. Consequently, by deliberately sending your personal information through our means of contact and/or the beginning of a business relationship with our company, we assume you are aware of and agree to the treatment of your personal details as is detailed in this present policy. This personal information will only be used for the purposes it was collected or for the purposes certain national or regional regulations allow us to.

In any case, we must warn you that not providing us with certain information we need could be an obstacle to the development of the contractual relationship between the parties with possible serious consequences at the moment of providing the services detailed in the business contract executed by the contracting party.

If you have any questions regarding this paragraph of the Data Protection Policy for Potential Clients, Clients and Providers of SEDA OUTSPAN IBERIA, S.L.U., please contact the company using the address provided in Paragraph 1: 'Who is Responsible for treating your data?' and we will be delighted to help you and answer any additional questions you may have.

10. Applicable law

The present Conditions are regulated at all times by the Spanish and European legislations in the topic of personal data protection and privacy.