

# DATA PROTECTION POLICY – IBERCENTER CENTRO DE NEGOCIOS S.L.U.

## 1.- Introduction

This Data Protection Policy regulates the processing of personal data provided by the USER through the website: [ibercenter.com](http://ibercenter.com), which IBERCENTER CENTRO DE NEGOCIOS S.L.U., provides to internet USERS. This Policy is accessible at all times on the website.

El USUARIO garantiza que los datos aportados son verdaderos, exactos, completos y actualizados, siendo responsable de cualquier daño o perjuicio, directo o indirecto, que pudiera ocasionarse como consecuencia del incumplimiento de tal obligación. En el caso de que los datos aportados pertenecieran a un tercero, el USUARIO garantiza que ha informado a dicho tercero de los aspectos contenidos en este documento y obtenido su autorización para facilitar sus datos a IBERCENTER CENTRO DE NEGOCIOS S.L.U., para los fines señalados.

The USER guarantees that the data provided is correct, accurate, complete and current, and is liable for any direct or indirect harm or damage that may occur as a result of the non-compliance of this obligation. In the event that the data provided belongs to a third party, the USER guarantees that it has informed said third party of the aspects contained in this document and obtained their consent to provide their data to IBERCENTER CENTRO DE NEGOCIOS S.L.U., for the indicated purposes.

IBERCENTER CENTRO DE NEGOCIOS S.L.U. respects prevailing legislation regarding personal data protection, the privacy of USERS and the confidentiality and security requirements of personal data, in accordance with that established in applicable legislation regarding data protection, specifically Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016. In light of this it has adopted the necessary technical and organisational means to prevent the loss, misuse, alteration, unauthorised access and theft of the personal data provided, in view of the state of technology, nature of the data and the risks to which it is exposed.

More specifically, the USERS of the website are informed that their personal data can only be obtained for processing when it is appropriate, relevant and not excessive in relation to the scope and the specific, explicit and legitimate purposes for which it was obtained.

## 2.- Who is the Data Controller?

Article 4.7 of (EU) Regulation 2016/679, of 27 April 2016 (hereinafter, GDPR) defines the data controller or controller as the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. In other words, it can be a natural or legal person or a public administration that determines the purposes and means that are used for the processing of the personal data of the data subject.

IBERCENTER CENTRO DE NEGOCIOS S.L.U., is responsible for the processing of the personal information of its clients that it performs.

### 2.1 Legal notice

In accordance with Article 10 of Law 34/2002, of 11 July, regarding information society and e-commerce services (LSSI-CE), it is hereby stated that the website [ibercenter.com](http://ibercenter.com) belongs to IBERCENTER CENTRO DE NEGOCIOS S.L.U., a Spanish company with registered address at C/ Gran Vía, 6 – 4th floor, 28013 – Madrid (Madrid), with Spanish Tax ID (CIF) number B86876406, and registered in the Madrid Commercial Registry on sheet M-570568, folio 57, volume 31,711, book 0, section 8, entry 1.

### 2.2 Data protection officer

The entity does not have a data protection officer (DPO).

## 3.- Contents and acceptance of the Privacy Policy

The aim of this Privacy Policy is to state the way in which personal data of those who access the services associated with this Website is collected, processed and protected, so that Users can decide freely and voluntarily whether they wish to provide their personal data through the forms enabled for this purpose. Similarly, the Privacy Policy regulates the processing of the personal data provided in the past by you through other means other than through the Website, or that you may provide in the future with reference to this Policy, always provided that it does not expressly contradict what was expressly accepted by you when you provided the data, which will be respected in any case. USERS' personal data can only be obtained for processing when it is appropriate, relevant and not excessive in relation to the scope and the specific,

explicit and legitimate purposes for which it was obtained.

### 3.1.- Purposes of data processing

The information provided by the USER will be processed to handle the requests made by the USER:

- a) Queries and requests for service proposals, submitted through the contact form enabled for this purpose.
- b) CVs submitted through the corresponding form.
- c) Requests for information regarding our services.

### 3.2.- Exercise of rights by the USER

The USER can exercise their rights to access their data and have it amended and deleted, as well as oppose its processing and request that it be handed over. Under certain circumstances, USERS can request limitation of the processing of personal data, in which case it will only be held for the exercise or defence of claims. USERS have the right to receive a response regarding the periods established in prevailing legislation regarding data protection, and may choose between the following means: writing to IBERCENTER CENTRO DE NEGOCIOS S.L.U. via the postal address at C/ Gran Vía, 6 – 4ª planta, 28013 – Madrid (Madrid), providing evidence of their identity with a scanned copy of your identity documents and specifying the right which they wish to exercise, or via email to [tecnicos@iberinve.com](mailto:tecnicos@iberinve.com).

For any breach of your rights, especially when you are not satisfied with their exercise, you can lodge a claim with the Spanish Data Protection Agency: [www.aepd.es](http://www.aepd.es)

### 3.3.- USERS' data conservation period

We only store your information while we need it to be able to use it for the purpose it was collected, and in line with the legal grounds for processing it in accordance with the applicable law. We will hold your personal information while we have a contractual and/or commercial relationship with you or as long as you do not exercise your right to deletion, cancellation and/or processing limitation of your data.

In these cases we will keep the information duly blocked, and not use it, as it may be necessary to exercise or defend claims or another kind of judicial, legal or contractual liability may arise from its processing, which must be dealt with and therefore require it to be recovered.

### 3.4.- How do we collect your information?

- a) **Visits to our website** This information is collected through cookies, for further information read the cookie policy that you will find on our website.
- b) **Social media.** It is likely that social media have their own privacy policies, in which they will explain how they use and share your personal information. We recommend that you carefully read the privacy policies before using these social media to ensure that you agree with the way in which your personal information is collected and shared.
- c) **Mobile telephone. telephone** The majority of mobile devices provide users with the possibility of deactivating location services. The most likely is the possibility that it is found in the settings menu of the device. If you have any queries about how to deactivate the location services, we would recommend that you contact your mobile services operator or the device manufacturer.

### 3.5.- Minors

Minors cannot use the services available through the Website without the prior authorisation of their parents, guardians or legal representatives, who will be solely responsible for all the actions performed through the Website by minors in their charge, including completing forms with the personal data of these minors and where appropriate, the ticking of any accompanying boxes. In this sense and as IBERCENTER CENTRO DE NEGOCIOS S.L.U., is not able to control whether users are minors, please note that it should be the parents and guardians who enable the mechanisms necessary to prevent minors from accessing the Website and/or providing personal data unsupervised, with IBERCENTER CENTRO DE NEGOCIOS S.L.U. not accepting any liability in this regard.

In addition to the foregoing, IBERCENTER CENTRO DE NEGOCIOS S.L.U. should personal information be obtained from a minor by mistake, this information will be deleted as soon as possible.

### 3.6.- International transfers or personal data

The personal information that we collect remains exclusively in Spain. In the event of using the Cloud Computing services, these may be located in the U.S., a relationship that is covered in the agreements between the EU and the U.S. Decision (EU) 2016/1250 by the Commission, on 12 July 2016.

### 4.- I.T. security

IBERCENTER CENTRO DE NEGOCIOS S.L.U., has attempted to implement and maintain the security levels required by Law to protect the personal data of USERS against incidental losses and unauthorised access, processing or disclosures, given the state of the technology, the nature of the data stored and the risks to which it is exposed. Nevertheless, the transfer of information online is not completely safe, and therefore, in spite of IBERCENTER CENTRO DE NEGOCIOS S.L.U. doing its utmost to protect USERS' data, it cannot guarantee its safety while it is being transferred to the Website. Therefore, all of the information provided will be sent at your own risk.

Once the data has been received, IBERCENTER CENTRO DE NEGOCIOS S.L.U., will use rigorous procedures and security functions to prevent any unauthorised access.

### 5.- Third-party links

The Website [www.ibercenter.com](http://www.ibercenter.com), se podrían incluir enlaces a sitios controlados por terceros. Con otros sitios web que considera que pueden ser de utilidad para los usuarios. El establecimiento del enlace no implica la existencia de relación alguna entre IBERCENTER CENTRO DE NEGOCIOS S.L.U., y el propietario de la página web enlazada, como tampoco la aceptación y aprobación por parte de IBERCENTER CENTRO DE NEGOCIOS S.L.U., de sus contenidos y/o servicios, siendo su propietario el único responsable de los mismos. El usuario, por tanto, deberá extremar la prudencia en la valoración y utilización de la información, contenidos y/o servicios existentes en los portales enlazados. Debe recordar que, al usar un enlace para acceder desde este portal a otra web, dejará de surtir efectos nuestra Política de Privacidad y la Política de Cookies.

This Privacy Policy does not reflect the privacy practices of other third-party websites. IBERCENTER CENTRO DE NEGOCIOS S.L.U. rejects any liability with regards the privacy and processing of data of other websites. Browsing and interaction on any other website, including those that are linked with [www.ibercenter.com](http://www.ibercenter.com) are subject to the regulations and policies of that website. The terms and conditions of the Privacy Policy and the Cookie Notice do not apply to the aforementioned links. Due to the fact that IBERCENTER CENTRO DE NEGOCIOS S.L.U. has no control over the pages connected by the links included in this Website, the User acknowledges and accepts that IBERCENTER CENTRO DE NEGOCIOS S.L.U. accepts no liability for any content or the services accessible on said pages, nor for any content, products, services, advertising or any other material available therein.

Examples include Facebook®, LinkedIn®, Twitter® and third-party applications. The privacy practices of third parties are governed by the individual privacy declarations of third parties. We are not responsible for the security or the privacy of the information collected by these third parties. It is your duty to review the privacy policies or declarations relating to these third parties. It is possible that some of our services may included social media functions, such as the "Like" button on Facebook as well as the "Share" button and some mini interactive programs.

Furthermore, you may decide to start your session via your own social media account such as Facebook and LinkedIn, and enter some of our services in this way. If you decide to connect via a social media account or similar service, it is possible that we may receive and store the authentication information for this service to allow you to start the session, as well as any other information that you decide to share when you connect to these services. These services can collect information such as the websites that you visited and the IP address and can establish cookies to allow for these functions to operate correctly.

We are not responsible for the security or the privacy of the information collected by these third parties. It is your duty to review the privacy policies or declarations belonging to the third-party services that you use or access or connect to. If you do not wish for your personal information to be shared with your social media account provider, nor with other social media service users, do not connect your social media account to your services account and do not participate in the social interaction function of the services.

We recommend that you read the privacy and data processing policies of the websites that you visit through the links on our Website or in any other way.

Lastly, it is forbidden to introduce hyperlinks for the purposes of advertising, marketing or association of websites that are not [ibercenter.com](http://ibercenter.com) which allow access to the website of IBERCENTER CENTRO DE NEGOCIOS S.L.U. without consent and/or express authorisation.

### **5.1.- Data shared with third parties**

IBERCENTER CENTRO DE NEGOCIOS S.L.U., will not provide USERS' personal data to any third parties without the legal grounds to legitimise this processing.

Cookies are used to perform analytical studies on the service use.

### **6.- Cookies**

Like other internet websites, this Website uses cookie-based technology to collect information about the way in which it is used. If you wish to obtain further information regarding how IBERCENTER CENTRO DE NEGOCIOS S.L.U. uses the cookies, please read the [Cookie Notice](#) here or click on the link that appears at the bottom of the homepage at any time.

### **7. Advertising**

IBERCENTER CENTRO DE NEGOCIOS S.L.U. will include first-party or third-party advertising on the Website for products or services that it believes may be of interest. However, the Entity cannot control the appearance of said advertising, nor the quality or suitability of the products and services referred to therein, and therefore the Entity will not be liable for any damages that may be incurred by the user as a result.

### **8. Intellectual and industrial property**

All of the content on the: [ibercenter.com](http://ibercenter.com), website is the intellectual property of IBERCENTER CENTRO DE NEGOCIOS S.L.U. or third parties which cannot be reproduced, copied, pasted, linked, transferred, distributed or manipulated in any way or for any purpose without the prior authorisation in writing of IBERCENTER CENTRO DE NEGOCIOS S.L.U., keeping at all times the copyright intact and any other indicator of the intellectual property of the materials or contents. Any use or modification of the Material or Contents for any other purpose other than that authorised in the General Conditions will be considered a breach of protective international copyright laws.

### **9.- Legislation and jurisdiction**

Service provision is governed by Spanish legislation, with the USER expressly submitting to the jurisdiction of the Courts of Madrid.

### **10.- Updates**

It is possible that this Privacy Policy may need to be updated, therefore it is necessary for you to review this policy regularly and if possible every time that you access the Website with the objective of being properly informed on the type of information collected and its processing. You can find the Privacy Policy at the bottom of the Website.

*The Privacy Policy was last updated on [15/05/2020].*