

## **PRIVACY POLICY**

Identification:

Holder: DAVELCO, S.A NIF: A33370925

Registered adress: Polígono Industrial Riaño 1. C/Olmos-Llameres, 10, 33920 Langreo, Asturias

Registered in the mercantile register: ASTURIAS. VOLUME 1324 BOOK 0 SECTION 8 PAGE 195 SHEET 0 5085

### **Privacy statement**

Davelco is aware of the importance to you of how we use your personal information and how we share it. This Privacy Policy is intended to help you understand what data we collect, for what purpose we use it and our efforts to protect it. We appreciate the trust you place in us to treat it with appropriate safeguards and in accordance with applicable law.

The personal data you provide through the website located at the URL "davelcogrupoavance.es" (hereinafter, the "Website") will be processed as described in detail below.

#### **Where does it come from and what information do, we process?**

The data you have provided directly to us:

Through the forms on the Web Site, such as user name and password, your name and surname are generally obligatory (unless otherwise specified in the required field) in order to comply with the established purposes. Therefore, if they are not provided or are provided incorrectly, they cannot be attended to, without prejudice to the fact that you may freely view the content of the Website.

Data collected automatically through cookies:

We also collect data automatically through cookies or devices for storing and recovering data on the navigation and use you make of our website, in order to know the interest generated by our content and advertisements on social networks, e-mails or SMS. As well as analysing the response rates through clicks or comments, in our events or publications.

#### **What user data will Davelco process?**

Davelco will process the following categories of user data:

Identifying data: name, surname(s), DNI, postal address, e-mail address, telephone number.

In the event that the User provides data from third parties, he states that he has the consent of the same and undertakes to pass on the information contained in the Privacy Policy, exempting Davelco from any responsibility in this regard. However, Davelco may carry out periodic checks to ascertain this fact, adopting the appropriate due diligence measures, in accordance with data protection regulations.

## For what purpose and what is the legitimacy of the processing of the user's personal data?

The personal data provided through the Website will be processed by Davelco, in accordance with the following purposes:

- Purposes based on the fulfilment of the commercial or institutional relationship
  - ◇ To manage, process and respond to requests, applications, incidents or queries from the user, when they provide their data through the forms provided for that purpose on the Website.
- Purposes based on legitimate interest:
  - ◇ To carry out customer satisfaction surveys and market studies aimed at evaluating the quality of our products and services.
  - ◇ To manage the sending of commercial communications of our own or from third parties which may be of interest to you, taking into account the products and services you have contracted with Davelco and within the reasonable expectations you have as a User, which will allow us to offer you the best experience adapted to your needs.
- Purposes requiring explicit consent: Davelco will request the express and unequivocal consent of the User in order to:
  - ◇ Carrying out commercial campaigns that require the creation of a commercial profile from data sources outside Davelco.
  - ◇ Use traffic data, in order to analyse your preferences and to be able to make available to you personalised commercial offers of products and services of its own and of third parties.

## For how long will Davelco process the user's data?

Davelco will process the user's personal data, in compliance with the principle of limiting the period of conservation, for the time necessary to provide the services requested and will keep them until you express your opposition or revoke your consent. In these cases, the information will be kept duly blocked without us being able to use it while it is necessary for the exercise or defence of legal or contractual claims. Likewise, in compliance with the obligations arising from Law 25/2007, of 18 October, on the conservation of data relating to electronic communications and public communications networks, Davelco will keep the traffic and location information for a period of 12 months in order to comply with the duty of information in the event of receiving a request from the Judicial Authority. In cases where we obtain data automatically through cookies, you may limit their use in time by deleting them from your browsers or devices. You can consult detailed instructions in our Cookie Policy.

## To which recipients will the user data be communicated?

User data may be communicated to

- The Public Administrations in the cases provided for by the Law.
- The State Security Forces and Corps and the National Intelligence Centre by virtue of the provisions of the Law.
- Banks and Financial Institutions for the collection of the services offered.
- Other companies of the business group for internal administrative purposes and the management of the products and services contracted.
- The Public Registries of Patrimonial Solvency and the Systems of Prevention against Fraud, to which the data relative to non-payments and incidents in the payment of products or services contracted to Davelco or third parties may be communicated.

## **User's responsibility.**

### **The User:**

Guarantees that the data he provides to Davelco is true, accurate, complete and up-to-date. To this end, the User is responsible for the veracity of all the data he or she communicates and will keep the information provided properly updated, so that it corresponds to his or her real situation.

He/she will be responsible for any false or inaccurate information provided through the Website and for any damages, direct or indirect, caused to Davelco or to third parties.

### **Commercial and promotional communications.**

One of the purposes for which Davelco treats the personal data provided by Users is to send them communications by e-mail or SMS with information on products, services, promotions and offers, as the case may be based on legitimate interest or consent.

If the user wishes to stop receiving such communications from Davelco, or revoke the consent given, you can send the request by email to a [info@davelcogrupoavance.es](mailto:info@davelcogrupoavance.es) attaching a copy of valid identity document.

The User may exercise the following rights at any time and free of charge

- Right of access: you have the right to obtain confirmation of whether or not personal data concerning you are being processed.
- Right of rectification: you have the right to obtain the rectification of inaccurate or incomplete data concerning you.
- Right of erasure: you have the right to obtain the erasure of personal data concerning you when they are no longer necessary for the purposes for which they were collected.
- The right to the portability of your data, as well as the limitation of processing, in the cases provided for in the data protection regulations.
- Right to oppose: you will have the right to oppose the processing of your data. Davelco will cease to process the data, except for compelling legitimate reasons, or the exercise or defence of any claims.
- Obtain human intervention, to express your point of view and to contest the automated decisions taken by Davelco.
- File a complaint regarding the protection of your personal data with the Spanish Data Protection Agency through its website ([www.agpd.es](http://www.agpd.es)), or by writing to its postal address (C/Jorge Juan, 6, 28001-Madrid).

The interested parties may exercise their rights by sending a letter to DAVELCO S.A; Polígono Industrial Riaño 1. C/Olmos-Llameres, 10, 33920 Langreo. with the reference "Data Protection", or by e-mail to [info@davelcogrupoavance.es](mailto:info@davelcogrupoavance.es) attaching a copy of your identity card.

### **Security measures.**

The security of information is one of our firm commitments and in compliance with current legislation Davelco treats the user's data at all times in an absolutely confidential manner and keeping the mandatory duty of secrecy regarding them, adopting for this purpose the necessary technical and organizational security measures to ensure the security of your data and prevent its alteration, loss, or unauthorized access, given the state of technology, the nature of the data stored and the risks to which they are exposed.