

# Privacy policy

## DATA CONTROLLER

**Identity:** GRUPO FINANCIERO RIVA Y GARCIA, S.L.(in advance, RIVA Y GARCIA)

**CIF:** B31674617

**Postal address:** C/ Diputació 246 principal - 08007 BARCELONA - ESPAÑA

**Email address:** rgpd@rivaygarcia.es

**Data Protection Officer:** AURIS ADVOCATS

**Contact DPD:** Xavier Saula Adell. Calle Mallorca 237 bis Ppal 1.A. Barcelona. Web: [www.aurisadvocats.com](http://www.aurisadvocats.com). Email address: [xavi@aurisadvocats.com](mailto:xavi@aurisadvocats.com).

## COMPANIES RELATED TO GRUPO RIVA Y GARCIA

Business Name	NIF	Address
GRUPO FINANCIERO RIVA Y GARCIA, S.L.	B6377804 7	c/ Diputació, 246 Principal  08007 – BARCELONA
RIVA Y GARCIA GESTIÓN SGIIC, S.A.	A7886316 4	c/ Diputació, 246 Principal  08007 – BARCELONA
RIVA Y GARCIA PROYECTOS, S.A.	A6034293 8	c/ Diputació, 246 Principal  08007 – BARCELONA

## PURPOSE OF PROCESSING

Your personal data will only be used for the following purposes:

- Carry out the necessary commercial and administrative procedures with the users of the web;
- Send advertising commercial communications by email, fax, SMS, MMS, social communities or any other electronic or physical means, in case the User has expressly consented to send commercial communications electronically by subscribing the NEWSLETTER;
- Respond to queries and / or provide information required by the User;
- Carry out the provision of services and / or products contracted or subscribed by the User.
- Use your data to contact you, both electronically and non-electronically, to obtain your opinion about the service provided and,
- Notify you changes, important developments of the privacy policy, legal notice or cookie policy.
- Analysis of profiles and usability will be carried out.
- The data of customers and / or suppliers will be treated, within the contractual relationship that links them with the person in charge, in compliance with the administrative, fiscal, accounting and labor obligations that are necessary under current legislation.
- Security of the facilities through a video surveillance system.

You can revoke your consent at any time by sending a letter with the subject "Low" to [rgpd@rivaygarcia.es](mailto:rgpd@rivaygarcia.es)

In accordance with the LSSICE, RIVA Y GARCIA does not carry out SPAM practices, therefore, it does not send commercial e-mails that have not been previously requested or authorized by the User. Consequently, in all communications you receive from RIVA Y GARCIA, you have the option to cancel your express consent to receive our communications.

We will not process your personal data for any other purpose than those described above except as required by law or court order.

Your data will be kept as long as the business relationship with us lasts or you exercise your right of cancellation or opposition, or limitation to the processing. However, we will retain certain personal identification and traffic data for a maximum period of 2 years in the event that it is required by the Judges and Courts or to initiate internal actions arising from the improper use of the website.

It will not be the subject of decisions based on automated processing operations that have an effect on your data.

## **LEGITIMISATION OF PROCESSING**

The legal basis for the processing of the data is your consent given to carry out the purposes described above, which will be requested at the time of ticking the appropriate box when collecting your data.

Not providing the personal data requested or not accepting this data protection policy means that it is impossible to subscribe, register or receive information about the products and services of the Provider.

In cases where there is a previous contractual relationship between the parties, the legitimacy for the development of the administrative, fiscal, accounting and labor obligations that are necessary under current legislation will be the prior existence of the commercial relationship established between the parties.

## **COMUNICATIONS**

Any communication sent will be incorporated into the information systems of RIVA Y GARCIA. By accepting these conditions, terms and policies, the User expressly consents to RIVA Y GARCIA performing the following activities and / or actions, unless the User indicates otherwise:

- The sending of commercial and / or promotional communications by any means enabled informing the Users of the activities, services, promotions, advertising, news, offers and other information about the services and products related to the activity. In the event that the User has expressly consented to the sending of commercial communications electronically by subscribing the NEWSLETTER, the sending of such communications by electronic means informing the Users of the activities, services, promotions, advertising, news, offers and other information about the services and products of RIVA Y GARCIA equal or similar to those that were originally the object of contract or interest by the User. The conservation of the data during the periods provided in the applicable provisions.

## **OFFICIAL MEDIA**

The user is informed that the means enabled by the company to communicate with customers and others affected is the corporate phone, business mobile phones and corporate email.

If you submit personal information through a means of communication other than those indicated in this section, the COMPANY will be exempt from liability in relation to the security measures provided by the means in question.

## **RECIPIENTS OF ASSIGNMENTS OR TRANSFERS**

RIVA Y GARCIA carries out assignments to third parties that process and manipulate the data as well as international transfers for the same purpose. The user expressly accepts the assignment of his data limited to the purposes indicated in this document.

Likewise, the lender will provide information to the security forces and bodies under judicial order or due to the obligation of a legal norm, without prejudice to be able to block or cancel your account if there may be indications of the commission of a crime by the user. The information provided will only be available to the provider at this time.

The information that you provide to us both through this website and through the application will be hosted on the servers of RIVA Y GARCIA.

Rights :

- Right of access: allows the interested party to know and obtain information about their personal data submitted to treatment.
- Right of rectification or deletion: it allows to correct errors and modify the data that prove to be inaccurate or incomplete.
- Right of cancellation: allows data that turns out to be inadequate or excessive to be deleted.
- Right of opposition: the right of the interested party to not carry out the processing of their personal data or to cease it.
- Limitation of the treatment: it involves the marking of the personal data kept, with the purpose of limiting its future treatment.
- Portability of the data: facilitation of the data object of treatment to the interested party, so that he can transmit it to another person in charge, without impediments.
- The right not to be subject to automated individual decisions (including the preparation of profiles): the right not to be the subject of a decision based on automated treatment that produces

effects or significantly affects.

As a user, you have the right to withdraw the consent given at any time. The withdrawal of consent will not affect the lawfulness of the treatment carried out before the withdrawal of consent. You also have the right to submit a claim to the supervisory authority if you believe that your rights may have been violated in relation to the protection of your data (agpd.es).

## ADDITIONAL INFORMATION

### INFORMATION THAT WE COLLECT

We obtain the minimum and indispensable information through the registration form. In this form you will provide the following information: address and contact telephone number and any other requested.

Through this Privacy Policy we inform you that the photographs that are posted on the website are the property of RIVA Y GARCIA, including those of minors, in which, in order to obtain them, prior consent has been obtained from the parents, guardians or legal representatives by signing the forms created for this purpose by the centres in which the minors are a part.

### VIDEO SURVEILLANCE

In some points of sale, images are captured for the sole purposes indicated in the purpose section of this privacy policy and / or at the request of public authorities.

We have an informative circular at the request of the interested parties that request it and a video-monitored zone logo located in a place prior to the camera and sufficiently visible that the place is a video-surveilled establishment.

The images captured by the cameras will be limited to the public establishment in question. No images of the public road will be captured except for a minimum strip of access to the establishment.

The recording system will be located in a guarded or restricted access area. The images obtained will be accessed only by the authorized person and will be kept for a maximum period of one month from their capture.

### SOCIAL NETWORKS

We inform you that RIVA Y GARCIA can have a presence in social networks. The treatment of the data that is carried out of the people who become followers in the social networks (and / or carry out any link or connection action through the social networks) of the official pages of RIVA Y GARCIA will be governed by this section, as well as those conditions of use, privacy policies and access regulations that belong to the social network that is appropriate in each case and previously accepted by the user.

RIVA Y GARCIA will process your data with the purpose of correctly managing your presence in the social network, informing you of activities, products or services of the provider, as well as for any other purpose that the regulations of the Social Networks allow.

The publication of contents is prohibited:

- That they are allegedly unlawful by national, community or international regulations or that they carry out activities that are allegedly unlawful or contravene the principles of good faith.
- That threaten the fundamental rights of people, lack of courtesy in the network, annoy or may generate negative opinions on our users or third parties and in general whatever the content that RIVA Y GARCIA considers inappropriate.
- And in general that contravene the principles of legality, honesty, responsibility, protection of human dignity, protection of minors, protection of public order, protection of privacy, consumer protection and intellectual and industrial property rights.

Likewise, RIVA Y GARCIA reserves the right to remove, without notice from the website or from the corporate social network, those contents deemed inappropriate.

Communications sent through social networks will be incorporated into a file owned by RIVA Y GARCIA, and may send you information of interest.

You can access more information, as well as consult the companies that are part of our group, in this privacy policy.

In any case, if you send personal information through the social network, RIVA Y GARCIA will be exempt from liability in relation to the security measures applicable to this platform, and the user should, if he wants to know them, check the corresponding conditions particular of the network in question.

## **SECURITY MEASURES**

The information you provide will be treated confidentially. The Provider has adopted all the technical and organizational measures and all the levels of protection necessary to guarantee the security in the treatment of the data and to avoid its alteration, loss, theft, treatment or unauthorized access, according to the state of technology and nature of the stored data. Likewise, it is also guaranteed that the treatment and registration in files, programs, systems or equipment, premises and centers comply with the requirements and conditions of integrity and security established in the current regulations.

## **LANGUAGE**

The language applicable to this Privacy Policy is Spanish. Therefore, in case there is any contradiction in any of the versions provided in other languages, the Spanish version will prevail.

## **SHIPPING CV**

In the event that the user submits his CV through our website, we inform him that the information provided will be treated to make him participant in the selection processes that may exist, carrying out an analysis of the applicant's profile in order to select the best candidate for the vacancy of the Responsible. We inform you that this is the only official procedure to accept your CV, so CVs submitted by another procedure will not be accepted. In case of any change in the data, please inform us in writing as soon as possible, in order to keep your data properly updated.

The data will be kept for a maximum period of one year, after which the data will be deleted guaranteeing a total respect to confidentiality both in the treatment and in its subsequent destruction. In this sense, after the aforementioned deadline, and if you wish to continue participating in the selection processes of the Responsible, please return your CV.

The data may be processed and / or communicated to the member companies of our group during the time of conservation of their curriculum and for the same purposes previously reported.

## **CHANGES IN THIS PRIVACY POLICY**

RIVA Y GARCIA reserves the right to modify this policy to adapt it to legislative or jurisprudential changes.

## LEGISLATION

For all purposes, the relationship between RIVA and GARCIA with the Users of its telematic services, present on this Website, are subject to the Spanish legislation and jurisdiction to which the parties expressly submit, being competent for the resolution of all conflicts arising or related to its use the Courts and Tribunals of BARCELONA.