

PRIVACY POLICY

1. INTRODUCTION

We at SANKYO DESARROLLOS TÉCNICOS, S.L. are committed to the protection of privacy and the correct use of the personal data we process and that you provide us with, both online on this website and, where applicable, on any of its subdomains and microsities, in addition to offline.

Please read this policy carefully and make sure you understand and agree with it before providing us with your personal data. If you do not agree with it, do not use this website or its services or provide us with your data.

The use of this website and any of its services, and the provision of your data, either online or offline, will be interpreted as you having provided us with your full consent (when necessary) to process your data for the purposes indicated below.

2. WHO IS THE DATA CONTROLLER?

SANKYO DESARROLLOS TÉCNICOS, S.L.
Postal address: C/ Manisitu, 5 - Pol. Ind Lurgorri, 01240, Alegría-Dulantzi (Álava/Araba)
E-mail: info@sankyo-sdt.com
Telephone: 945 420 840

3. HOW DO WE OBTAIN YOUR DATA?

3.1. From the interested parties themselves

If you are a client (current or potential) or user of our website, you will have provided us with your personal data, either offline or online, when requesting our products or services, or when contacting us to ask for information. Moreover, you may have provided us with your personal data in person when visiting our facilities.

On providing us with your personal data you are guaranteeing that you are authorised to do so, and that the information is true, up-to-date and does not infringe any contractual restrictions or third-party rights. You are responsible for keeping your data and profile accurate and up-to-date, and SANKYO DESARROLLOS TÉCNICOS, S.L. will not be held liable in the event you fail to do so. You hereby agree not to impersonate other users by using their registration data provided for the different services and/or contents of the Website.

- The categories of data we process are: identification data (name and surnames, taxpayer number (NIF/CIF)), contact data (telephone number, postal address, e-mail address, billing and delivery address), sales and economic data (information on products requested, client history, and payment data: bank and credit card details...), online profile data (information, preferences and interests).

3.2. Obtained automatically when you visit our website

When you visit our website or any of our other platforms (social networks, mobile applications...), we collect information through cookies and other tracking technologies and web analytics. This means that data is sent from your browser to our servers in order to optimise our services and improve your user experience. Such data may be collected and stored automatically by us or by third parties on our behalf. You can refer to our cookie policy.

- The categories of data this includes are: the user's IP address, the date and time of the visit, the URL of the website the user was referred from, the pages visited on our website, information on the browser used (type and version of browser, operating system, etc.).

3.3. Provision of the interested party's data by a third party

Your data may not have been provided to us directly by you, but has been provided to us by a third party with which we work or to which you have provided such data in the past. For example:

- Publicly owned registers: such as civil registry offices, business registers, property registers and other public administrative registers.
- Our **sales or distribution network**, after providing your data to our sales representatives.

In addition, through the acceptance of this privacy policy and, where applicable, through the express consent you have given, you are authorising SANKYO DESARROLLOS TÉCNICOS, S.L. to ask third parties for the data we require to provide the services.

- **In these cases, the categories of data we process may be:** identification data; data of a personal nature; data on social, academic and professional circumstances; economic, financial and insurance data; transaction data related to transactions of goods and services, employment details.
- **We do not process specially protected data.**

3.4. Disclosure of third-party data

Regarding other people's data, you must respect their privacy, taking special care when disclosing or publishing their personal data. Only the owner of personal data can grant authorisation for it to be processed. The publication of third-party data without the consent of these parties may infringe the regulations relating to the right to the honour, the privacy and the image of such third parties, in addition to the regulations on data protection.

If you provide us with third-party data, you must have the prior and express consent of the party in question to use it, and you are required to inform such third parties of how we intend to process their data. By accepting this privacy policy, you are expressly guaranteeing that you have such authorisation, thereby exonerating us from all liability in the event of a claim filed by an interested party.

4. WHAT DO WE PROCESS YOUR DATA FOR?

▪ SUMMARY TABLE OF PURPOSES AND THEIR LEGAL BASIS

The data you provide us with, in addition to that generated during the execution of our relationship, can be processed for different purposes with different legitimisation bases.

PURPOSE	LEGAL BASIS
<p>To contact you, to communicate and to manage the contractual relationship</p> <p>In the event you provide us with your curricular data or send us your CV, to contact you and to manage our selection processes.</p>	<p>Contractual relationship or the implementation of pre-contractual measures at the request of the interested party (art. 6.1. b of the GDPR)</p>
<p>To send potential clients electronic messages with information on our activities, products and/or services similar to those requested.</p>	<p>Consent</p>
<p>Assignments arising from tax regulations</p>	<p>Compliance with a regulation or legal obligation</p>
<p>To send current clients electronic messages with information on our activities, products and/or services similar to those requested.</p> <p>Analysis of the behaviour of users of our websites, computer applications and/or social networks within the context of their browsing, including the creation of simple, non-intrusive profiles through the integration and joint processing of the information obtained through cookies or similar technologies of any content with the information on users in our databases or social networks, to conduct market research and offer users personalised content and commercial communications</p> <p>Installation of technical cookies</p> <p>In the case of users of our website or the sender or recipient of an e-mail: to manage those submitted online and to put them in touch with you.</p>	<p>Legitimate interest</p>
<p>Video surveillance of the facilities for the safety of people and property.</p>	<p>Public interest</p>
<p>When the legitimization is based on consent, you may withdraw your consent at any time by sending us an e-mail to that effect at info@sankyo-sdt.com. Such withdrawal does not condition the processing of your data for the remaining purposes specified.</p> <p>If the processing of your data is based on our legitimate interest, we regard it to be proportionate and to involve a minimum impact on your privacy, however your interests, rights and liberties will always prevail over our legitimate interest and, as such, if you do not want us to process your data for these purposes, please send us an e-mail to this effect to info@sankyo-sdt.com and we will comply.</p>	
<p>The provision of the data we ask for is mandatory as it is essential in order to execute and/or maintain the contractual or pre-contractual relationship and to comply with the legal obligations arising therefrom. If you do not provide it, we will not be able to provide the services arising from this relationship.</p>	

5. HOW LONG DO WE RETAIN YOUR DATA FOR?

5.1. General retention period

The personal data you provide us with will be kept for as long as the contractual, pre-contractual or commercial relationship remains in force and, once such relationships have ended, for as long as the interested party does not ask for their data to be deleted. Even if the interested party asks for their data to be deleted, we may keep it for the time required and subject to limited processing, only for:

- Comply with the legal/contractual obligations to which we are subject;
- and/or for the legal terms established for the prescription of any liability on our part;
- and/or the exercise or defence of claims arising from the relationship held with the interested party.

In coordination with the aforementioned criteria, personal data stored on either computer records or on paper may, at the discretion of the organisation, be deleted based on logistical and/or storage space needs rendering the deletion of information or documentation advisable.

- **If you have submitted a job application along with your CV:** we will keep it until you ask for it to be deleted / for as long as the offer is valid in order to contact you for selection processes.

6. TO WHOM MAY WE DISCLOSE YOUR DATA?

We hereby inform you that the data you provide us with may be disclosed to third parties in order to meet purposes directly related to the legitimate duties of assignors and assignees, such as:

1. **Banking entities:** for the management of collections and payments.
2. **Health insurance entities and third-party prevention services:** in compliance with obligations related to occupational health surveillance and occupational risk prevention.
3. **Entities and bodies to which there is a legal obligation to disclose data:** for example, the Tax Authorities, the Department of Social Security...
4. **Notaries public, courts and tribunals, registry offices, prosecutors, legal experts, etc.**
5. **Insurance companies:** for the management and insurance of commercial risks / in the case of credit and surety insurance to ensure the collection of transactions or civil liability insurance/for the insurance of defective products in the event of potential claims by clients.

7. INTERNATIONAL TRANSFERS OF DATA

SANKYO DESARROLLOS TÉCNICOS, S.L. will ensure that your personal data is always processed and kept in the European economic area. However, in certain circumstances, we may conduct international transfers of data, for example, if it is required to enter into or to execute a contract, in the interest of the interested party, between SANKYO DESARROLLOS TÉCNICOS, S.L. and another individual or legal entity, or in the event it is required for the execution of a contract between the interested party and SANKYO DESARROLLOS TÉCNICOS, S.L. For example, when using service providers located outside the European Union, which may have access to personal data, for the provision of services complementing our activity (hosting, housing, SaaS, remote back-up, support services and computer maintenance, e-mail administrators, remittance of e-mails and e-mail marketing, file transfers, etc. ...) or for the execution of pre-contractual measures adopted at the request of the interested party. These entities may be different and vary over time, but we will strive to choose entities that either belong to countries with a level of protection equivalent to European levels in terms of data protection, or that have the due guarantees to achieve that level, or when such transfers are conducted on the basis of any of the exceptions set forth in the GDPR for this purpose. Aside from the aforementioned cases, in the event a transfer needs to be made to a country without European level protection, for example, due to the fact the country in question has no data protection authority or regulation designed to protect the rights of interested parties, we will inform you of this risk to enable you to specifically authorise and consent to such transfers.

8. WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

You may, when applicable, exercise your rights of access, amendment, deletion, limitation and opposition to the processing of your data, in addition to other rights, to the postal or electronic mail address indicated at the beginning of this privacy policy; in both cases in the form of a written and signed request with an attached copy of your ID or passport or other valid identification document. In the event of any change to your data, you must provide notification of the fact to the same address, whereby this entity will under no circumstances whatsoever be held liable if you fail to do so.

- **Right of access:** you may ask us what personal data we are processing and ask for a copy of it if you so wish.
- **Right of amendment:** you may ask us to amend any inaccurate personal data or to complete any incomplete data, including through an additional statement.
- **Right of deletion (right to be forgotten):** you may ask us to delete your personal data when: it is not required for the purposes for which it was collected; you withdraw your consent; it has been processed illegally; or due to compliance with legal obligations.
- **Right of limited processing:** you may ask us to limit the processing of your data, in which case we will only keep it for the exercise or defence of claims.
- **Right of opposition:** you may oppose the processing of your data if such processing is based on the legitimate interest of the data controller or is for advertising purposes.

Once any of aforementioned requests has been received, we will respond to you within the legally established timeframes. You may submit a complaint to the Spanish Data Protection Agency. If you would like more information on the rights you are entitled to exercise and to ask for the standard forms for exercising your rights, please visit the Spanish Data Protection Agency website at www.aepd.es