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A marketing solution created to suit you



Data protection policy of IMPAOR, S.A.



1. Who is the Data Controller for your data?

The data controller for processing data on the different processes involving managing our users, customers or suppliers is **IMPAOR, S.A.**, whose registered office is in C/ Río Guadalquivir, 10 - 28110 ALGETE (province of MADRID) and tax code (CIF)A79335758.

For purposes of our data protection policy the contact telephone is 91 628 04 80 and the electronic mail to contact is sergiobadajoz@impaorsa.com.

2. What type of data do we have on your person and how have we obtained this?

The categories of personal data concerning its customers and providers that **IMPAOR, S.A.** processes are:

- Identification data.
- Postal or electronic mail addresses.
- Commercial information.
- Economic data and information on transactions.
- Add further categories of data should this be applicable.

We will not process specially protected data under any circumstances.

We have obtained all the data mentioned above either directly from you by means of a contact form or submission of a commercial offer, contractual proposal, etc. or by means of your company through giving us identification data and other information necessary to carry out the purpose of the contractual relationship between the parties. Supplying us with the updated data in the event of any modification will be an obligation of yours or of the company.

3. For what purpose do we process your data?

At **IMPAOR, S.A.** we process the data supplied to us by the interested parties in order to manage different activities resulting from specific procedures carried out in the area of sales, aftersales services, management of providers, quality of services, etc. This means that we will use your data to carry out any of the following measures:

- a. Sending information which we are requested by means of the contact form of our web page or any other form of contact with our company.
- b. Providing both potential customers and our own customers with offers of products and services of interest to them.
- c. Carrying out administrative, tax and accounting management of our customers and/or suppliers.
- d. Carrying out satisfaction surveys, market studies, etc. in order to be able to offer you the most suitable offers and optimised service quality, etc.

We are not going to draw up commercial profiles based on the information supplied and we will consequently not make automated decisions involving you based on a commercial profile.

4. How long will we keep your data for?

The personal data on natural persons connected with potential customers, customers and suppliers that **IMPAOR, S.A.** compiles by means of the different contact forms and/or information collected will be kept until its erasure is requested by the interested party. The data provided by our customers and providers will be kept for as long as there are commercial relations between the parties, respecting in any event the minimum legal periods for storage depending on the subject matter.

In any event **IMPAOR, S.A.** will store your personal data for as long as is reasonably necessary, taking into account our need to give a reply to any issues which you may bring up or to solve problems, make improvements, activate new services and comply with the requisites laid down by applicable legislation. This means that we may store your personal data for a reasonable period of time, even after you have ceased to use our products or have ceased to use this web page. After this period, your personal data will be eliminated from all the systems of **IMPAOR, S.A.**

5. What is the lawful basis for processing your data?

Depending on the type of data processing we will now sum up the lawful basis for this processing:

PROCESSING	LAWFUL BASIS
Accounting management: management of invoicing with customers and/or suppliers.	Maintaining, performing and monitoring the contractual relationship between the parties.
Tax management: application of withholdings, rebates, etc.	Maintaining, performing and monitoring the contractual relationship between the parties; compliance with legal obligations
Administrative management: management of logistics, warehouses, customer deliveries,	Maintaining, performing and monitoring the contractual relationship between the parties.
Marketing: comercial action on oir productos or services intended for our customers or the persons who have asked us for information on these in the past, including carrying out satisfaction surveys on our customers.	Free and unequivocal consent of the interested party him or herself (potential customers), informing you that withdrawal of this consent may under no circumstances condition performance of any contract that might exist between the parties; lawful interest of the company on the promotion and marketing of products or services similar to the ones obtained or requested by interested parties in the past.

As regards the aforementioned lawful basis you are obliged to provide personal data, and in the event of not providing us with your personal data your contract will not be able to be performed, and the legal obligations or other duties resulting from public authorities will not be able to be complied with.

6. To what addressees will your data be given?

IMPAOR, S.A. will never share your personal data with any third party company intending to use this in its direct marketing actions, except in the case of your having expressly authorised us to do so.

We wish to inform you that we may provide your personal data to bodies of the Public Administration and competent authorities in any cases in which **IMPAOR, S.A.** receives a formal request by said authorities or in cases which, acting in good faith, we consider that such a measure is reasonably necessary to comply with a legal procedure; to answer any claim or lawsuit; or to protect the rights of **IMPAOR, S.A.** or of its customers and the general public.

In the event of not intending to make assignments to third parties including other companies in the Data controller's group:

We wish to inform you that your data will not be assigned or made known to third parties, **IMPAOR, S.A.** being the sole party responsible for its processing and custody.

IMPAOR, S.A. may provide your personal data to third parties (e.g., providers of Internet services who help us to run our web page or to carry out the services contracted, I.T. support and maintenance companies, logistics companies, administrative and tax or accounting management offices, etc.). In any event, these third parties will at all times have to keep the same security levels as **IMPAOR, S.A.** with regard to your personal data and, when this is necessary, they will be bound by legal commitments in order to store your personal data on a private and secure basis, and in order for the information only be used in line with the specific instructions of **IMPAOR, S.A.**

7. What are your rights as affected or interested party?

Anyone is entitled to obtain confirmation as to whether **IMPAOR, S.A.** is handling personal data concerning them or not.

More specifically, the interested parties may request the right to access their personal data, as well as to receive this in a common mechanised reading format if the processing is carried out by electronic media (right to portability).

The interested parties may furthermore request the right to rectification of any inaccurate data or where applicable, request its erasure when, amongst other reasons, the data is no longer necessary for the purposes for which it was compiled.

On a complementary basis, in certain circumstances, the interested parties may request the limitation of processing of their data or in certain circumstances and on grounds concerning their specific situation, the interested parties may exercise their right to oppose processing of their data. **IMPAOR, S.A.** will cease to process the data except for any lawful and pressing reasons, or for handling its defence from possible claims, or in any exceptions established in applicable legislation.

You are furthermore informed that you are entitled to withdraw your consent granted at any time, without this affecting the lawfulness of the processing based on consent prior to its withdrawal.

The User is also informed that you may exercise the aforementioned rights at any time by writing to us at the contact data shown in Section 1, 'Data Controller' of this Data Protection and Privacy Policy of **IMPAOR, S.A.**, enclosing a copy of your I.D. card. You are also entitled to submit a claim to the Spanish Data Protection Agency, especially when you have not obtained satisfaction in the exercise of your rights.

Agencia Española de Protección de Datos
C/ Jorge Juan, 6
28001 - Madrid
Tel : 901100099 / 912663517

8. Protection of the web page users' data

According to current Regulation (EU) 2016/679, **IMPAOR, S.A.** informs that the personal data of the website Users will be processed for purposes of the processing specified in each data collection form on our web page by **IMPAOR, S.A.**. This processing of your data will be covered by your own consent. When pressing the "SEND" button, the User consents to their data being processed by **IMPAOR, S.A.**

We also wish to inform you that unless this is legally mandatory or your express consent is obtained, **IMPAOR, S.A.** will not assign your data to third parties. (In the event of assignment, inform of which data will be assigned and to whom).

The User is similarly informed that you may at any time exercise rights of access, rectification or erasure of data as well as making use of other rights acknowledged herein and governing their specification by Regulation (EU) 2016/679, by informing **IMPAOR, S.A.**, of this at C/ Río Ebro, esquina C/ Río Guadalquivir, 10 - 28110 ALGETE (province of MADRID) and holder of tax code (CIF) A79335758, e-mail: sergiobadajoz@impaorsa.com.

Apart from this, as laid down in Act 34/2002, of 11 July, on Information Society Services and Electronic Commerce, **IMPAOR, S.A.** undertakes not to send advertising by electronic mail without having obtained the addressee's express authorisation. The User may oppose having advertising sent by marking the proper box.

9. Other information of interest on our privacy policy

9.1 Security Measures

IMPAOR, S.A. adopts the levels of security required by European and Spanish legislation in force on data protection, taking into account the state of the art, the costs of application and the nature, scope, context and purposes of said processing, as well as the variable risks of probability and seriousness for your rights and liberties as a person.

9.2 Processing of minors' data

For **IMPAOR, S.A.** it is of great importance to protect minors' privacy, and subject to this, only the data of your minor children will be required in any cases in which this is strictly necessary to comply with certain legal obligations (for example, application of income tax withholdings, etc.).

In any event, such data will always be collected with your express consent as parents or tutors.

9.3 Modifications of our Data Protection and Privacy Policy

IMPAOR, S.A. may occasionally make amendments and corrections to this section on Policy for Data Protection for Employees. Please check this section regularly to consult the changes that could have been made and to what extent these could affect you.

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

This Section on the Policy of Data Protection for Employees provides an easily accessible way of obtaining all the information required for you to be able to learn the type of data that **IMPAOR, S.A.** keeps on its potential customers, customers and/or providers, the purposes involved, the rights that data protection legislation grants you as affected party and how to exercise these rights. Hence, by deliberately sending your personal data by means of our contact media and/or by getting commercial relations under way with this company you are considered to recognise and agree to processing of your personal data as described in this policy. This personal information will only be used for the purposes for which you have given this or for which certain national or regional regulations allow us to do so.

In any event we must warn you that refusing to provide us with certain requested data may hold up the development of contractual relations between the parties with possible serious consequences when providing the different services considered in the commercial contract entered into with the contracting party.

If you have any question with regard to this Data Protection Policy for Potential Customers, Customers and Providers of **IMPAOR, S.A.**, please get in touch with the company using the address provided in Section one "Data Controller" and we will be delighted to help you and answer any further questions that you may wish to bring up.

10. Applicable legislation

These Conditions shall be governed at all times by what is laid down in Spanish and European legislation on the subject of personal data protection and privacy.