



# PRIVACY POLICY

## A) Introduction

The Privacy Policy is part of the “Terms of Use” that rule the website [www.nitcai.com](http://www.nitcai.com) together with the Legal Notice, the Use Policy and Cookies Policy published in this site.

NITCAI respects current legislation on the protection of personal data, the privacy of users and the secrecy and security of personal data, in accordance with the provisions of applicable legislation on data protection. Specifically, the Privacy Policy has been developed pursuant to the provisions of the “Personal Data Protection and Guarantee of Digital Rights” Organic Law 3/2018, of December 5, 2018 (the “LOPD GDD”), and pursuant the European General Data Protection Regulation 679/2016 (the “EU GDPR”) from the European Parliament and the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. To this end, NITCAI adopts the necessary technical and organizational measures to prevent the loss, misuse, alteration, unauthorized access and theft of the personal data provided, taking into account the state of technology, the nature of the data and the risks to which they are exposed. In particular, NITCAI informs that the user’s personal data may only be obtained for processing when it is adequate and relevant in relation to the specific, explicit and legitimate scope and purposes for which it was obtained.

## B) Data Processing Manager and Data Protection Officer

The responsible for the user’s personal data processing is NITCAI DATA MANAGEMENT, S.L. (hereinafter NITCAI), with address at Avda. Moratalaz, 187 3ºB 28030 Madrid (Spain), NIF B16892341, email address [info@nitcai.com](mailto:info@nitcai.com) and telephone +34 637 47 33 21.

The Data Processing Officer (DPO) ([dpo@nitcai.com](mailto:dpo@nitcai.com)), recognizes the importance of protecting the privacy sphere of the user and/or visitor of the website (hereinafter referred to as the “user”), for which it has been developed the present privacy policy for the protection of personal data (the “Privacy Policy”), so that the user can freely decide if he wants to facilitate



NITCAI the personal data that may be required or obtained in connection with his use of this website and/or the requesting of any of the services offered therein.

## C) Purpose of the personal data processing

In compliance with the provisions of the GDPR regulation, NITCAI inform the user that personal data and information provided to complete any electronic form available in the website (the “data”), will be incorporated to a personal data file owned by NITCAI.

The purpose of the personal data processing is to process the user’s request, depending on the reason for which the data was provided:

- **Data management of candidates’ curriculums vitae.**

Data categories to be processed: Details in the CV of the person applying for the job: name and surnames, DNI/CIF/identification document, address, signature and telephone number. Sensitive personal data: gender, nationality, civil status, age, date and place of birth. Academic and professional Data: qualifications, academic education and professional experience. Image data: photo.

- **Data management of labour relations of Quibim personnel.**

Data categories to be processed: Contact information. Data regarding working life, salary and social security.

- **Data management of providers**

Data categories to be processed: Contact information and data needed to execute payments, and to track orders and/or contracted services.

- **Data management of customers**

Data categories to be processed: Contact information and other data necessary to provide services and issue invoices.

- **Data management of users**

Data categories to be processed: Contact information and data related to service access and usage.

- **Data management of subscribers to the newsletter**

Data categories to be processed: Contact information (name and email address).

- **Data management of new contacts**



Data categories to be processed: Contact information (name of the individual and/or organization he/she represents. Contact information such as email address, telephone number and/or postal address).

Data sources: In all processing mentioned, personal data comes from the interested party.

Questions included in forms are of a voluntary nature, except those marked with an asterisk (\*), which are mandatory. In the case of not answering mandatory questions, NITCAI reserves the right not to process incomplete requests.

## **D) Legitimacy for Data Management**

With regard to the processing of user data by NITCAI, it will be legitimated by the explicit consent given by the interested party for the processing of his/her personal data with the intended purposes. The unequivocal and independent consent for each processing purpose is manifested when accepting the privacy policy.

## **E) Data Communications with Third Parties**

NITCAI is committed not to give, sell, or share the data with third parties without the express and previous user consent. Moreover, international data transfers are not performed.

It will be possible to legitimately communicate data to natural and legal persons related to the Data Processing Manager for the delivery of services associated with the purposes of the processing, under NITCAI instructions. By contract, it is mandatory to protect and use such data only for the purposes for which it has been provided and being consistent with the current Privacy Policy.

Personal data provided by the user in the website can be communicated to public organisms, courts and other administrative authorities, when deemed necessary, in order to comply with a legal obligation or to exercise legal actions against claims.

Furthermore, NITCAI will cancel or rectify data whenever being inexact, incomplete or are not necessary or appropriate anymore for the purpose for which it was originally provided by the user.

## **F) Commercial Communications**



NITCAI, by means of some of the electronic forms included in the website, will request your explicit consent in order to be able to send you commercial communications by any means, including e-mail or equivalent means of electronic communications.

## **G) Security Measures**

NITCAI adopts the security measures required by LOPD GDD and GDPR Regulations, appropriate to the nature of the data that are the object of treatment at any given time.

NITCAI guarantees that it has implemented appropriate technical and organizational policies to apply the security measures established by the RGDP in order to protect the rights and freedoms of users and has provided them with adequate information so that they can exercise them.

## **H) Duration of the Storage**

The storage periods of personal data of interested parties are set according to the following criteria:

- Personal data of clients and users: kept for a period of 5 years from the finalization of the provision of service by NITCAI.
- Personal data of providers and contacts: kept for a period of 3 years from the finalization of the commercial relationship with NITCAI.
- Personal data of personnel candidates: kept for a period of 2 years from the closing of the personnel selection process.
- Documentation of a labour-related or social security nature: the documentation or records or computer media in which the corresponding data have been transmitted to prove compliance with the obligations regarding affiliation, registrations, removals or variations that, where appropriate, occur in relation to said matters, as well as the contribution documents and the receipts justifying the payment of salaries and the delegated payment of benefits, including also all the contractual documentation, will be kept for a term of 4 years from the cessation of the employment and/or contractual relationship between NITCAI and the interested party.
- Personal data for commercial communications: NITCAI will keep indefinitely the personal data whose purpose of treatment is the send of commercial



communications, up to a maximum of one month after the interested party requests the cancellation of said data through the corresponding exercise of their rights.

## **I) Rights of the interested party**

The interested party who has provided his/her data to NITCAI may exercise his/her rights of access, rectification, suppression, limitation, portability and opposition (the “Rights of the interested party”), as well as to withdraw his/her explicit consent for the treatment of his/her personal data, on the terms legally provided for. For such purpose, a communication shall be notified:

- By post to the following address: Avda. Moratalaz, 187 3ºB 28030 Madrid, España
- By sending an e-mail to the following address: [info@nitcai.com](mailto:info@nitcai.com)

In both cases, indicating your name, surnames and a copy of your identity card.

Additionally, the interested party has the right to submit a claim to the Data Protection Control Authorities in case of violation of their rights as interested.

## **K) Amendments to the Privacy Policy**

NITCAI may unilaterally modify, at any time and without prior notice, the Privacy Policy, we therefore recommend that you print or save this policy and, in any case, to read and review the Privacy Policy every time you access the Website.

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