DATA PROTECTION POLICY

This text provides information on the data processing carried out by Pareja i Associats, Advocats, SLP, in the exercise of their consultancy and/or legal assistance activities, in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation or GDPR) and Organic Law 3/2018, of 5 December, on personal data protection and guaranteeing digital rights.

Who is the data controller?

The data controller for all personal data is Pareja i Associats, Advocats, S.L.P., with registered address in Avinguda Diagonal, 550, 4º 1ª, Barcelona (08021), telephone 933620300, email address info@pareja-advocats.com and website http://parejaadvocats.com/ca/.

What is the purpose and legitimacy in processing these data?

Contact.

We respond to enquiries by people who contact us by email or telephone. We process these data with the consent of the person who has contacted us. The data of these persons are not held on record unless we start to offer them services.

Client services.

We keep a record of client identity data, and clients themselves provide us with additional data (mainly on their occupation, social circumstances, level of education, family, economic situation and finances) as necessary for us to provide the services requested. We may obtain data on third parties from our clients, which we keep on record and process as necessary to offer our services. In any case, we only use these data to offer our services. The data are recorded in documents detailing our actions, and in the documents and computer systems for administration and accounting at our offices. Data processing is carried out in compliance with our contractual relationships (Article 6.1.b GDPR) and legal obligations (Article 6.1.c GDPR).

Who is the data shared with?

In general, we only share client data when it is necessary to complete the requested services. We share data with legal bodies and public authorities that act in the interest and representation of clients. We may also share client data with people who the client has a legally important relationship with, and other professionals we work with to provide our services - always making sure to inform the client in advance. We may share data with banks when billing for our services.

Our office uses the services of people or companies, for example, IT or accounting companies, which provide us with their experience and expertise. Sometimes they have to process personal data for which our office is the data controller. Under these circumstances, accessing the data does not constitute a transfer of data, but rather a processing request (Article 4.8 GDPR), which means that they can only process the data to offer their services, without being able to use them for other purposes. We formalise their confidentiality obligations when signing the contract for their services, and subsequently monitor their activities.

We do not transfer data outside the sphere of the European Union (international transfers).

How long do we hold data for?

We comply with legal obligations that limit the period we hold data for. For this reason we only hold data for the time necessary, when duly justified by the legitimate interest in collecting the data. Under certain circumstances, such as for the data contained in accounting and billing documents, tax regulations require us to hold these data until we no longer have any responsibilities in this regard.

What rights do people have in relation to the data we process?

The people whose data we process have the following rights:

<u>Access</u>. The right to know which personal data are subject to processing, the purpose they are being processed for, any transfers to other people, and the right to obtain a copy and know for how long the data will be held.

<u>Rectification</u>. The right to request rectification of inaccurate data.

<u>Deletion</u>. The right to request the deletion of data when, among other reasons, they are not necessary for the purposes they were collected for and which justified their processing.

<u>Restriction</u>. In certain circumstances it is possible to request the right to restrict the processing of data, in which case they will no longer be processed and will only be held to make or defend against claims.

<u>Portability</u>. The right to obtain personal data in a commonly used digital format, and to transfer the data to another data controller if the data subject so decides.

<u>Opposition</u>. When providing reasons related to a particular situation, a request may be sent to ask us to stop processing your data if processing may be in any way harmful.

How can you exercise or defend these rights?

The rights listed above may be exercised by sending a letter to our postal address or by sending an email to the address indicated in the header. If you consider that you have not obtained a satisfactory answer in the exercise of the rights, you may submit a complaint to the Spanish Data Protection Agency, through the forms or other channels found on this website www.agpd.es