

## **1. Privacy Policy**

At SANKYO DESARROLLOS TECNICOS, S.L. we are committed to the protection of privacy and the correct use of the personal data we process and which you provide us with both online via this website and, where applicable, via any of its subdomains, microsities, subsections, email, etc., and offline.

Please read this policy carefully and make sure that you understand it and agree with it before providing us with your personal data. If you do not agree with it, do not use this website or provide us with your data. By accessing this site, using any of its services or providing your data, whether online or offline, you are actively giving us your consent (whenever this is required) to process your data for the purposes indicated below.

## **2. Who is the controller of your data?**

SANKYO DESARROLLOS TECNICOS, S.L.

Corporate Tax Number (CIF) B01174796

C/ Manisitu 5 Pol. Ind. Lurgorri 01240 Alegría-Dulantzi (Álava)

+34 945 420 840 | [info@sankyo-sdt.com](mailto:info@sankyo-sdt.com)

## **3. How have we obtained your data?**

If you are already a current or potential customer, you have already provided it to us, either online or offline, when requesting our products and/or services.

This information includes, for example:

- Your contact details, including name and surname, address (invoicing or delivery), date of birth and email address and, optionally, your phone number. We need your email address and (optionally) your phone number to contact you if we have questions or information about your order;
- Other information necessary to process your order, such as information about the products requested, and information necessary for payment (bank, credit card, etc.);
- If you have contacted customer service, the details and the record of that contact.

When you provide us with your personal data, you guarantee that you are authorised to provide this information and that the information is truthful, accurate and up to date, that it is not confidential, that it does not breach any contractual restriction or rights of third parties, and you agree not to impersonate other users using their login data to the different services and/or content of the Website.

You are responsible for keeping your data and your profile accurate and up to date, holding SANKYO DESARROLLOS TECNICOS, S.L. harmless in the case of not doing so. If you are a user and you have provided us with the data through our website or any of its subdomains, microsites or subsections, we collect the information, for example, when you fill in any contact questionnaire with your personal data, or when you communicate with us directly by email.

When you visit our website, data is sent from your browser to our server to optimise our services and improve your user experience, for example, when you access the website or when you log in to social networks or Google through our website. This data may be collected and stored automatically by us or by third parties on our behalf. This data may include:

- the user's IP address
- the date and time of the visit
- the URL of the site from which the user has come
- the pages visited on our website
- information about the browser used (type and version of the browser, operating system, etc.).

We may process and record such uses, sessions and related information, either independently or with the help of third-party services, including through the use of "cookies" and other tracking technologies such as flash cookies and web analytics.

In relation to the above, we offer location services in Google Maps. If you use this mobile application, Google may receive information about your real location (such as GPS signals sent from a mobile device) or information that can be used to determine your location. You can normally enable or disable the location services on your device or browser settings.

We use the Google Maps service to help you find us more easily. To facilitate this process, we load an image of Google Maps and save the data of the route and the image of the map on our server.

For more information about Google Maps, consult its privacy policy since it is an external service not provided by us.

If we have received your data through a third party and not from you, this may have come from one of our salespeople who will have received the information from you.

In these cases, the data we will process may include: identifying data such as National ID number (DNI), name and surname, physical address, email, telephone, bank details, etc. We do not process sensitive data.

With respect to the data of other people, you must respect their privacy, taking special care when communicating or publishing their personal data. Only the owner of the personal data can authorise its processing. If you provide us with third-party data, you are responsible for obtaining their prior and express consent to use it and to send it to us. You are also responsible for informing them that we will be processing their data. The publication of third-party data without their consent may breach not only data protection regulations but also the right to honour, the privacy and the image of said third party. If you provide us with third-party personal data, by accepting this privacy policy, you expressly guarantee that you have the authorisation of the data subject for this purpose, exempting us from any liability in the event of any claim by the data subject, a liability that is solely and exclusively assumed by the party communicating the data on the data subject's behalf.

You are responsible for keeping your data accurate and up to date, holding SANKYO DESARROLLOS TECNICOS, S.L. harmless in the case of not doing so.

#### **4. Why do we process your data?**

The data you provide us with, as well as any other data generated during the performance of the contractual, commercial or other relationship that we maintain with you, may be processed by us for different purposes, such as:

a) If you are a current or potential customer, to manage the contractual and/or commercial relationship with current and/or potential customers and suppliers and to send you information about our products and/or services.

b) If you are simply a user of our website, to manage the requests that you make online.

In both cases, to contact and communicate with you and to send you information about our products and/or services (including advertising and/or commercial communications for the purposes of article 21 Law on Information Society Services and Electronic Commerce 34/2002)

c) If you send us your CV, to contact you and manage the recruitment processes we carry out.

#### **5. How long will we keep your data?**

The personal data you provide will be kept:

- In the case of current or potential customers and suppliers, for as long as the contractual or commercial relationship is maintained and, once concluded, while

the data subject does not request its deletion and, even if this is requested, solely for the period necessary, while blocking its processing, to comply with:

- any legal/contractual obligations to which we are subject and/or
  - for the statute of limitations of any liability on our part and/or
  - for the exercise or defence of legal claims arising from the relationship with the data subject.
- If you are simply a user of the website, we will keep your data until you request its deletion, and, even if this is requested, we may keep it, while blocking its processing, solely for compliance with legal obligations and/or the exercise or defence of legal claims.
  - If you are a potential candidate who has sent your CV, we will keep it until you ask for its deletion, in order to contact you during recruitment processes.

## 6. What is the legitimate basis for the processing of your data?

The legal basis that legitimises us to process your data may be any of the following:

- The **legal relationship** that binds us, if you are a current customer or supplier; or the offer, quote, request or pre-contractual relationship of any kind between the parties, if you are a potential customer or supplier.
- **Your consent**, if you have sent us your CV. This consent is granted unambiguously when you provide us with your data either by email, by ordinary mail, in person, etc., understanding these as clear affirmative acts that indicate said consent. You can withdraw this consent at any time by sending an e-mail to [info@sankyo-sdt.com](mailto:info@sankyo-sdt.com). The withdrawal of your consent does not affect the processing of your data for the other purposes described.

Providing us with your data is essential for the purposes indicated above; if you do not provide it, we will not be able to fulfil these purposes.

- Our **legitimate interest**, in accordance with Recital 47 of the GDPR (General Data Protection Regulation 2016/679 of 27/04/2016). Bearing in mind that when you provide us with your data based on the relationship you have with us, whether as a current or potential customer, or as a current or potential supplier, you can reasonably foresee that we may use it to:
  - contact you and inform you of our products and services (including advertising and/or commercial communications for the purposes of article 21 Law on Information Society Services and Electronic Commerce 34/2002)

- conduct satisfaction surveys
- use your data for internal administrative purposes including the processing of customers' personal data.

In any case, we believe that the indicated data processing is proportionate and has a minimal impact on your privacy. However, your interests, rights and freedoms will always prevail over our legitimate interest, so if you do not want us to process your data for these purposes, please send an email in this regard to [info@sankyo-sdt.com](mailto:info@sankyo-sdt.com) and we will do so, although we may keep your data blocked for the exercise or defence of legal claims. The withdrawal of your consent for us to process your data for these purposes does not affect the processing of your data for the other purposes described in the privacy policy.

#### **7. Who do we send your personal data to?**

We inform you that the data you provide may be sent to third parties for purposes directly related to the legitimate functions of transferor and transferee, for example:

1. To transport companies responsible for the logistics of sending and delivering of our products.
2. To banks for managing collections and payments.
3. To entities or bodies to whom we are legally obliged to communicate data (Tax Authority, etc.).

#### **8. International data transfers**

We inform you that **if we use any US suppliers** with access to personal data, to provide us with auxiliary services (housing, hosting, software as a service, remote backups, support or computer maintenance services, email clients, mass mailing and email marketing, file transfers, etc.), these companies may change over time, but we will only choose companies adhering to the Privacy Shield agreement between the US and the EU, or belonging to countries that have a certified adequate level of protection, which obliges them to comply with data protection requirements equivalent to those of the European Union. In any case, by accepting this data protection privacy policy you expressly and unambiguously authorise the transfer of data to these companies, accepting that this implies an international transfer of data to a country not belonging to the European Economic Area and granting your unambiguous consent to said transfer.

##### **1. Social networks and instant messaging applications**

If you communicate with us through WhatsApp, please do so responsibly. Please read the application's privacy policy and configure it according to your preferences before sending any personal data. Do not send us any information or files containing data that is sensitive or that you want to keep private via this means of communication; there are other safer ways to do so.

Although this type of messaging application can be very useful in certain circumstances, we remind you that the information you publish on the internet is accessible to many known and unknown persons, thus posing a risk to your privacy and that of others. We recommend you do not provide personal, private and/or sensitive information or any that you want to keep confidential using this application. We are not responsible for the operation and availability of the service since it is not provided by us but by a third party.

In addition, our website contains social network connectors. When you choose to interact with us through a social network, we cannot be held responsible for the privacy settings you have chosen, to the extent that the social network may record your IP address or the page you are visiting on our website and may set up cookies for the correct functioning of the website. It may also show your name and surname when you click "like" on any of our publications or post comments. If you do not want your personal data associated with those "likes" or those comments, you must configure your privacy settings appropriately, pseudonymise your data, for example, with a nickname or alias that does not reveal your name, etc.

If you log in to one of these social networks during your visit to one of our websites or mobile applications, the social network may add that information to your profile and that information will be transferred to the social network. If you do not wish the data to be transferred, log out of your session in the social network before accessing our website or mobile applications, since we cannot control this collection and transfer of data through the social network connectors.

If the user decides to publish and/or share texts, photos, videos and other information and/or content on a social network via our website, they will be solely responsible for ensuring that said content complies with the corresponding regulations. With respect to the data of other people, we remind you that you must respect their privacy, taking special care when communicating or publishing their personal data. Only the owner of the personal data can authorise its processing. The user may only publish on this website, or on our official social network pages, personal data, photographs and information or other content which they own or for which they have the authorisation

of third parties. If you provide us with or publish third-party data, you are responsible for obtaining their prior and express consent to use it, to send it to us and to publish it, and you are responsible for informing them that we will be processing their data or that you will be publishing it. The publication of third-party data without their consent may breach not only data protection regulations but also the right to honour, the privacy and the image of said third party.

In any case, we may remove both from this website and from our social network pages, any content published by the user when we detect that the user has breached current legislation and the provisions of this privacy policy.

Social Networks are not hosted directly on our Services. Your interaction with them is governed by their policies and not by ours. Read the privacy policies of these social networks for detailed information on the collection and transfer of personal data, your rights and your privacy settings.

In addition, our Services may allow you to share your personal information with third parties directly, such as using page frame techniques to provide content to or from Third Party Services or others, while retaining the appearance of our Website and our Services ("Frames"). Please note that this information is in fact provided to these third parties and not to us, and these interactions and exchanges are also governed by the policies of those third parties and not our own.

## 2. What are your rights when you provide us with your data?

- **Right to access:** You can ask us what personal data we are processing and request for a copy of it.
- **Right to rectification:** You can request the rectification of any inaccurate personal data or to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to erasure (right to be forgotten):** You can request the erasure of your personal data when: it is no longer necessary for the purposes for which it was collected; you withdraw your consent; the personal data has been unlawfully processed; or for compliance with a legal obligation.
- **Right to restriction of processing:** You can request the restriction of processing of data in which case it will only be stored for the exercise or defence of legal claims.
- **Right to data portability:** You can ask us to return your personal data (to you or a third party of your choosing) in a structured, commonly used and machine-readable format.

- **Right to object:** You can object to the processing of your data if said processing is based on the legitimate interest of the data controller or if it is for advertising purposes.

To exercise any of these rights you can send us a written and signed request, attaching in any case a copy of your National ID card (DNI), by post or email to the addresses indicated in section 2 of this privacy policy. You must notify us at the same address of any changes to your data, holding the company harmless in the event of not doing so.

We will respond within a maximum of 10 days to any of the above requests.

You can lodge a complaint to the Spanish Data Protection Agency. If you would like more information about the rights that you can exercise and to request the forms for exercising these rights, go to the Spanish Data Protection Agency website: [www.agpd.es](http://www.agpd.es).