



# Internal Information System Data Protection Policy

## INTERNAL INFORMATION SYSTEM DATA PROTECTION POLICY

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### 1. Who is responsible for the processing of your data?

TECNICA Y PROYECTOS, S.A  
A28171288  
C/ Gomera nº 9 - 28703 - San Sebastián de los Reyes - Madrid  
Tel. 91 722 73 00  
nrarias@typsa / jmalabau@typsa.es

### 2. For what purposes do we process your personal data?

At TECNICA Y PROYECTOS, S.A. we process the information provided to us by the interested parties in order to manage the Internal Information System with the purpose of informing of the acts or conducts occurred in the entity or caused by third parties that contract with it, and that could be contrary to the general or sectorial regulations applicable. If you do not provide your personal data, we will not be able to fulfill the purposes described above.

No automated decisions will be made based on the data provided.

### 3. How long will we keep your data?

The data will be kept for the time necessary to decide whether or not to initiate the investigation of the reported facts. The maximum period shall be three months from its entry into the system, unless the purpose of its conservation is to serve as evidence of the prevention model functioning, in which case, the data will be kept anonymized (LOPDGDD art. 24.4 and Law 02/2023 on the protection of persons who report violations of the law and the fight against corruption, art. 32).

### 4. What is the legitimacy for the processing of your data?

The legal basis for the processing of your personal data is:

- Mission in the public interest: Control of risks of non-compliance within the organization; (Organic Law 3/2018 of 5 December, on personal data protection and guarantee of digital rights [Preamble V]).
- Fulfillment of a legal obligation: Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23 October 2019, on the protection of persons who report breaches of European Union law (art. 8; obligation to establish internal whistleblower channels).
- Consent of the interested party: For the conservation and registration of the complaints made through the telephone line and voice messaging systems with recording, as well as for the recording of the personal meeting with the entity, requested for the purpose of reporting. (Directive (EU) 2019/1937; art. 18.2 and 4).

### 5. To which recipients will your data be communicated?

The data will be communicated to the following recipients: State Security Forces and Corps; Jurisdictional Bodies; Public Prosecutor's Office, with the purpose of reporting the commission of a possible offence (legal requirement).

## 6. Data transfer to third countries

No transfer of data to third countries is foreseen.

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

Any person has the right to obtain confirmation as to whether or not, at TÉCNICA Y PROYECTOS, S.A., we are treating, or not, personal data concerning them.

Interested parties have the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected. Likewise you have the right to the portability of your data.

In certain circumstances, the interested parties may request the limitation of the processing of their data, in which case we will only keep them for the exercise or defense of claims.

In certain circumstances and for reasons related to their particular situation, interested parties may object to the processing of their data. In this case, TECNICA Y PROYECTOS, S.A. will stop processing the data, except for compelling legitimate reasons, or the exercise or defense of possible claims.

You may exercise your rights by writing to:

- nrarias@typsa.es / jmalabau@typsa.es or
- C/ Gomera 9, San Sebastián de los Reyes, 28703 Madrid.

When commercial communications are sent using, as a legal basis, the legitimate interest of the data controller, interested parties may object to the processing of their data for this purpose.

The consent given is for all the purposes indicated, the legal basis of which, is the consent of the interested party. You have the right to withdraw such consent at any time, without affecting the lawfulness of the processing based on the consent prior to its withdrawal.

In the event that you feel that your rights concerning the protection of your personal data have been violated, especially when you have not obtained satisfaction in the exercise of your rights, you may file a complaint before the competent Data Protection Supervisory Authority via its website: [www.aepd.es](http://www.aepd.es).

## 8. How did we obtain your data?

The personal data that we process at TECNICA Y PROYECTOS, S.A. come from the complaint filed by the interested parties who have an employment, commercial or service provision relationship with the entity.

The categories of data processed are:

- Identification data.
- Commercial data.
- Economic data.

The following categories of special data are processed: health-related data.

