

## Social Networks: PRIVACY Policy

### SOCIAL MEDIA PRIVACY POLICY

#### 1. USER INFORMATION

##### Who is responsible for the processing of your personal data?

GRUPO EMPRESARIAL SANDO, S.A. and its subsidiaries, hereinafter, **DATA CONTROLLER**, inform the USER that it has created a profile on the Social Networks Facebook, Instagram, Twitter, LinkedIn, YouTube, Vimeo and Google+, that it is responsible for the processing of the user's personal data carried out on said social networks and informs the USER that these data will be processed under the provisions of Regulation (EU) 2016/679, of 27 April (GDPR), and Organic Law 3/2018, of 5 December (LOPDGDD), so you are provided with the following information on processing:

##### What do we process your personal data for?

**Purpose of processing:** to maintain a relationship between the USER and the CONTROLLER that may include the following operations:

- Process requests and queries submitted to the DATA CONTROLLER
- Inform about activities and events organised by the person in charge
- Inform about products or services offered by the DATA CONTROLLER
- Interact through official profiles

##### Why may we process your personal data?

**Legal basis for processing:** Article 6.1.a GDPR, the data subject has consented to processing their personal data for one or more specific purposes. The USER has a profile on the same social network and has decided to join the social network of the DATA CONTROLLER, showing interest in the information published therein. Therefore, when requesting to follow our official profiles, they provide us with their consent for processing the personal data published in their profile.

The USER can access the social network's privacy policies anytime and configure their profile to guarantee privacy.

The DATA CONTROLLER has access to and processes the USER's public information, particularly their contact name. This data is only used within the social network itself and will only be incorporated into a file of the DATA CONTROLLER when necessary to process the USER's request.

##### How long will we keep your personal data?

**Data retention criteria:** data will be kept if the USER does not revoke the consent given as indicated in this privacy policy.

##### To whom do we provide your personal data?

**Communication** of data: the information provided by the USER through the CONTROLLER's social networks, including their personal data, may be published, depending on the services the USER uses, so that it can be publicly available to other third-party users of the social networks. From each social network's profile, the USER can configure what information they want to make public in each case, see the permissions granted, and delete or deactivate them, such as any third-party application they no longer wish to use.

No communication of personal data to third parties outside the social network is foreseen, except if it is essential for the development and execution of the processing, to our service providers related to communications, with whom the DATA CONTROLLER has signed the confidentiality and data processor agreements required by current privacy regulations.

##### What are your rights?

**Rights that assist the USER:** they can only be satisfied concerning that information under the control of the CONTROLLER.

- Right to withdraw consent at any time
- Right of access, rectification, portability and deletion of your data, and limitation or opposition to its processing
- The right to complain to the supervisory authority ([www.aepd.es](http://www.aepd.es)) if you consider the processing does not comply with the regulations in force

**Contact details to exercise your rights:**

GRUPO EMPRESARIAL SANDO, S.A. Avda. Ortega y Gasset, 112, - 29006 Malaga (Malaga).

E-mail: [GDPR-Sando@Sando.com](mailto:GDPR-Sando@Sando.com).

**Contact information of the Data Protection Officer:** MEDINALEON

CONSULTORES ASOCIADOS S.L., - [pmedina@ml-asociados.es](mailto:pmedina@ml-asociados.es)

## 2. USE OF THE PROFILE

The DATA CONTROLLER will carry out the following actions:

- Access to Public Profile Information
- Publication of the USER's profile of all the information already published on the USER's social network.
- DATA CONTROLLER
- Send personal and individual messages through social media channels
- Page status updates to be posted on the USER's profile

The USER can always control their connections, delete content that is no longer of interest to them, and restrict who they share their connections with; to do this, you will need to access your privacy settings.

## 3. PUBLICATIONS

The USER, once they are a follower or have joined the CONTROLLER's social network, may publish comments, links, images, photographs or any other type of multimedia content supported by it. In all cases, the USER must own the published content, enjoy copyright and intellectual property rights, or have the consent of the affected third parties.

Any publication on the social network, whether texts, graphics, photographs, videos, etc., that threaten or are likely to violate morals, ethics, good taste or decorum, and/or that infringe, violate or violate intellectual or industrial property rights, the right to one's own image or the law is expressly prohibited.

In these cases, the DATA CONTROLLER reserves the right to remove the content immediately without prior notice and may request the permanent blocking of the USER.

The DATA CONTROLLER shall not be held responsible for freely publishing content by a USER.

The USER must remember that other users will know their publications, so they are primarily responsible for their privacy.

The images that may be published on the social network will not be stored in any file by the DATA CONTROLLER. Still, they will remain on the social network.

## 4. DATA OF MINORS OR PEOPLE WITH SPECIAL NEEDS

Access and registration through the CONTROLLER's social networks are forbidden to minors under 14. On the other hand, if the USER has special abilities, the intervention of the holder of their parental authority or guardianship, or their legal representative through a valid document that accredits the representation, will be necessary.

The DATA CONTROLLER will be expressly exonerated from any liability arising from using social networks by minors or people with special abilities. The CONTROLLER's social networks do not knowingly collect any personal information from

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minors. Therefore, if the USER is a minor, they should not register, use the CONTROLLER's social networks, or provide personal information.