

PRIVACY POLICY

This privacy policy is developed in accordance with the organic Law on the protection of personal information in force, as well as with Regulation 2016/679 of the European Parliament and with the Council of 27th April 2016 pursuant to the protection of physical persons with regards to the treatment of personal information and to the circulation of such information, henceforth RGPD (General Regulations for the Protection of Personal Information).

The purpose of this privacy policy is to inform the owners of the personal information —from whom information is being collected— about the specific aspects regarding the treatment of their data, and among other things, about the purpose of such treatment, the contact information for exercising their rights, the periods of preservation of their data and any security measures, among other matters.

Person responsible for the treatment

In terms of data protection, Termodinair, S.L.U. must be considered as the entity responsible for the Treatment regarding the files/treatments that are collected through this website or through any other means such as telephone, email, in-person communication, written communication using forms, legal documents, etc.

Below is the identification information of the owner of this website:

Person responsible for the treatment: Termodinair, S.L.U.

Postal address: Polígono Industrial de Carballo · Rúa do Bronce, parcelas G4-G5 · 15100 · Carballo · A Coruña

Electronic address: lop@termodinair.com

Data treatment

Any personal data that is eventually requested will only be the data that is strictly necessary for identifying and addressing the request made by the owner of such data, henceforth the interested party. This information will be treated in a true, lawful and transparent way regarding the interested party. Furthermore, personal information will be collected for purposes deemed explicit and legitimate, and shall not be treated later in a way that is incompatible with such purposes.

The data collected from each interested party must be adequate, pertinent and not be excessive in relation to the purposes pertaining to each case. They will be updated whenever necessary.

The owner of the personal information will be informed —prior to the collection of their information— of the general extreme cases regulated in this policy, to allow them to grant their express and unequivocal consent to the treatment of their data, in conformity with the following aspects.

Purpose of the treatment.

The precise purposes for which each one of the treatments is carried out are included in the information clauses incorporated into each of the means of data collection (website forms, paper forms, locutions or signs and information notes).

However, the personal information of the interested party will be treated with the sole purpose of providing them with an effective reply and addressing the requests made by the user, as specified next to each option, service, form or data collection system that the user may use.

Legitimation

As a general rule, prior to the treatment of personal information, Termodinair, S.L.U. obtains the express and unequivocal consent of the owner of such data by means of incorporating informed consent clauses into the different systems of data collection.

However, if the consent of the interested party is not required, the legitimising foundation of the treatment by which Termodinair, S.L.U. is supported consists in the existence of a specific law or regulation authorising or enforcing the treatment of the data of the interested party.

Recipients

As a general rule, Termodinair, S.L.U. does not engage in the cession or communication of data to third entities, save for cases of legal requirement. However, if it were necessary, the interested party would be notified of such cessions or communications of data through informed consent clauses that are contained in the different means of personal data collection.

Origin

As a general rule, personal data are always collected directly from the interested party. However, in certain exceptions, data may be collected through third parties, entities or services other than the interested party. In this sense, this exception will be notified to the interested party through the informed consent clauses contained in the different means of data collection and within a reasonable time frame once such data has been obtained, and within one month at the latest.

Preservation periods

The information collected from the interested party will be preserved in so far as it is needed for the purpose of complying with the ends to which such personal data were collected. Therefore, the data will be cancelled once such ends are met. Such cancellation will result in the blocking of the data, which will be kept available only for the Public Administration, judges and tribunals, for the purpose of addressing any eventual liabilities resulting from their treatment, during the prescription period thereof. Once the mentioned period is expired, the information will be destroyed.

For information purposes, below are the legal periods for preserving the information, in accordance to various subjects:

DOCUMENT	DEADLINE	LEGAL REF.
Work-related or social security-related documents	4 years	Article 21 of Royal Legal Decree 5/2000 of 4th August approving the revised text of the Law on infractions and penalties in Social Order.
Accounting and fiscal documentation regarding commercial matters	6 years	Art. 30 Code of Commerce
Accounting and fiscal documentation regarding fiscal matters	4 years	Articles 66 to 70 General Law on Tax Collection
Access control to buildings	1 month	Proceedings 1/1996 of the AEPD (Spanish Data Protection Agency)
Video surveillance	1 month	Proceedings 1/2006 of the AEPD (Spanish Data Protection Agency) Organic Law 4/1997

Browsing data

Regarding the browsing data that may be treated through the website, if any data subjected to regulations are collected, we recommend consulting the Cookie Policy published on our website.

Rights of the interested parties

The regulations pursuant to data protection grants a set of rights to the interested parties or to the owners of said data, to website users or users of the social network profiles of Termodinair, S.L.U..

The rights granted to the interested parties are the following:

- Right to access: the right to obtain information on whether your own data are being subjected to treatment, the ends to which the treatment is being performed, the data category in question, the recipients or category of recipients, the period of preservation and the origin of such data.
- Right to rectification: the right to obtain the rectification of inaccurate or incomplete personal data.
- Right to delete data: the right to obtain the deletion of the data in the following cases:
 - o When the data are no longer necessary for the purpose for which they were collected
 - o When the owner of the data takes back their consent
 - o When the interested party opposes the treatment
 - o When the data must be deleted for the purpose of complying with a legal obligation
 - o When the data have been obtained by virtue of a service provided by the information society on the basis of the provisions included in art. 8, section 1 of the European Regulation on Data Protection.
- Right to opposition: the right to oppose a certain treatment based on the consent of the interested party.
- Right to limitation: the right to obtain the limitation of the treatment of data in the following cases:
 - o When the interested party impugns the accuracy of the personal data, during a period that will allow the company to verify the accuracy thereof.
 - o When the treatment is illicit and the interested party opposes the deletion thereof.
 - o When the company no longer needs the data for the ends to which they were collected but the interested party continues to require them for formulating, exercising or defending complaints.
 - o When the interested party has opposed the treatment while it is being verified whether the legitimate motives of the company prevail over those of the interested party.

The interested parties may exercise the indicated rights by contacting Termodinair, S.L.U., in written form at the following address: lopd@termodinair.com indicating in the subject matter the right that they wish to exercise.

In this sense, Termodinair, S.L.U. will address your request as soon as possible while bearing in mind the deadlines indicated in the regulations pursuant to data protection.

Furthermore, it must be taken into account that the interested party or owner of the data may at any time present a complaint before the competent control authority.

Security

The security measures adopted by Termodinair, S.L.U. are the measures required, as set forth in article 32 of the GDPR. In this sense, Termodinair, S.L.U., bearing in mind the state of technology, the costs of application and the nature, scope, context and purposes of the treatment, as well as the variable risks of probability and severity with regard to the rights and liberties of physical persons, has established the appropriate technical and organisational measures to guarantee the level of security that is required for the existing risk.

In any case, Termodinair, S.L.U. has implemented sufficient mechanisms to comply with the following:

- a) Guaranteeing the permanent confidentiality, integrity, availability and resilience of the treatment systems and services.
- b) Restoring the quick availability and access to personal data in the event of a physical or technical incident.
- c) Verifying, assessing and evaluating on a regular basis the efficacy of the technical and organisational measures that are implemented in order to guarantee the safety of the treatment.
- d) Storing the data under pseudonym or in an encoded form if necessary.