# **PRIVACY POLICY**

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter GDPR), states in Article 12 that privacy policies should be simple, concise, transparent and comprehensible to all citizens.

## What is the privacy policy?

The privacy policy is a legal document that the company must have in order to inform clients, suppliers and any other user about the means by which personal data are obtained, the treatment that is going to be carried out with them, who is responsible for this treatment, the periods of conservation and the possibility of exercising the rights recognized to the interested parties in the current regulations.

#### Identification and contact details of the controller

The SMART OCCUPANCY Application (hereinafter the APP) is the property of PLAIN CONCEPTS, S.L.U. entity responsible for the processing of personal data collected through the APP. You can consult the information related to the entity that manages the APP by accessing the Terms and Conditions of Use.

Likewise, the purpose of this Privacy Policy is to inform about the different rights that the interested parties have by virtue of the RGPD. If you have any questions regarding the processing of your personal data, you can contact us at *gdpr@plainconcepts.com*.

## Description of the information contained in this Privacy Policy

At PLAIN CONCEPTS we care about privacy and transparency. In this privacy policy you will find identified, clearly and in simple language, the processing of personal data that affect the use of the SMART OCCUPANCY application and of which PLAIN CONCEPTS, S.L.U. it's responsible.

In each of the identified processing operations, you will be informed mainly about:

- The purposes of the processing of personal data.
- The legal bases that allow the processing of data for each of the indicated purposes.
- The possible communication of the data to third parties, as well as the reason for such communication.
- The existence of international data transfers.
- The period of time for which the data will be kept, depending on the
  different treatments that are carried out. Likewise, we inform you
  that the data may remain blocked for the purpose of dealing with
  judicial, administrative or tax claims, for the periods of time legally
  determined by each applicable regulation.

## Use of SMART OCCUPANCY

PLAIN CONCEPTS is committed to respecting the privacy of visitors to APP SMART OCCUPANCY in accordance with applicable data protection legislation and this privacy policy.

By using this APP, you agree to the collection, processing, transfer, preservation, and other aspects of the processing of your personal data in accordance with this Privacy Policy and its terms. If you do not fully agree with them, you should not use APP SMART OCCUPANCY.

The processing that are carried out through the SMART OCCUPANCY application are the following:

# Processing of the data of Management of the occupation and optimization of work

INFORMACIÓN BÁSICA SOBRE PROTECCIÓN DE DATOS

Controller: PLAIN CONCEPTS, S.L.U.

- Purpose: Management of the occupation of workspaces and optimization of their use.
- **Legitimacy**: Performance of a contract. Consent of the interested party.
- Recipients: Data transfers are planned to: Public Administration with competence in the matter; Insurance entities; Organizations or people directly related to the Data Controller. International data transfers are not foreseen.
- Rights: You have the right to access, rectify and erasure the data, as well as other rights, indicated in the additional information, which you can exercise by contacting *gdpr@plainconcepts.com* or to Avda. Ordoño II, 32 1° Izda. 24001 León (Spain).
- Origin: The interested party.

# | Complete information on data protection

## 1. Who is controller for processing your data?

PLAIN CONCEPTS, S.L.

B24532178

AVDA. ORDOÑO II, 32 – 1st Left – 24001 – LEON (SPAIN).

Telephone: 987044131

E-mail: gdpr@plainconcepts.com

Data Protection Officer (DPO):

LEASBA CONSULTING, S.L. represented by José Luis Sánchez Calvo. c/Julia Morros, 1 – León Technology Park, Common uses building,

offices oficinas 109-115 – 24009 León (SPAIN).

Telephone: 987263832 E-mail: *dpo@leasba.com* 

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

At PLAIN CONCEPTS, S.L.U. We treat the information provided by interested persons in order to manage the occupation of physical work spaces in order to enable the user, through the APP, to reserve and occupy said spaces, optimize their use throughout working hours and provide that information to users to facilitate reservations and uses.

In the event that you do not provide your personal data, we will not be able to comply with the functionalities 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 as long as the interested party continues to use the APP and as long as they do not request its erasure, respecting in any case the deadlines for compliance with legal obligations that in no case will be less than five years.

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

We indicate the legal basis for the treatment of your data:

- Performance of a contract: Obligations included in the access contract and in the terms and conditions of use of the SMART OCCUPANCY APP.
- Consent of the interested party: To use the APP, the user must accept the terms and conditions of use and the Privacy Policy of SMART OCCUPANCY

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

The data will be communicated to the following recipients:

- Public Administration with competence in the matter, for the fulfilment of legal obligations (legal requirement).
- Insurance entities, to carry out the necessary insurance formalization (contractual requirement).
- Organizations or persons directly related to the person in charge of the processing.

#### 6. Data transfers to third countries

Data transfers to third countries are not foreseen.

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

Any person has the right to obtain confirmation as to whether PLAIN CONCEPTS, S.L. is processing personal data concerning them. The persons concerned 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. You also have the right to the portability of your data. In certain circumstances, data subjects may request that the processing of their data be limited, in which case we will only keep them for the

Under certain circumstances and for reasons related to their particular situation, data subjects may object to the processing of their data. In this case, PLAIN CONCEPTS, S.L. will stop processing the data, except for compelling legitimate reasons, or the exercise or defence of any claims. You may materially exercise your rights in the following way: by sending an e-mail to <code>gdpr@plainconcepts.com</code>, by going to the address of the person responsible for the processing or by contacting the DPO at <code>dpo@leasba.com</code>.

Where the sending of commercial communications is carried out using the legitimate interest of the data controller as a legal basis, the data subject may object to the processing of his/her data for that purpose. If you have given your consent for a specific purpose, you have the right to withdraw the consent given at any time, without this affecting the lawfulness of the processing based on the consent given prior to its withdrawal. If you feel that your rights have been infringed with regard to the protection of your personal data, especially when you have not obtained satisfaction in the exercise of your rights, you may file a complaint with the competent Data Protection Supervisory Authority through its website: www.aepd.es.

#### 8. Data transfers to third countries

The personal data that we treat in SMART OCCUPANCY come from the interested party. The categories of data that are processed are:

User identification data:

exercise or defence of claims.

- · Names and surnames.
- · Email addresses
- · Phone number.
- Photograph



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