



# WEB PRIVACY POLICY

**IMPORTANT NOTICE:** Although this policy has been translated into English language, the Spanish version of the policy shall take precedence. Only the Spanish language shall be the official, controlling, governing and recognised language of all documents of the ALUDEC GROUP. In the event of any dispute between the Spanish version and the English version, the Spanish version shall prevail.

In compliance with Regulation (EU) 2016/679 of 27 April 2016, (hereinafter 'RGPD' and the Organic Law 3/2018, of 6 December, on Data Protection and Guarantee of Digital Rights (hereinafter, LOPDgdd), you are provided with the following information on our processing of your personal data on this website.

## DATA PROCESSING CONTROLLER

ALUDEC, S.A. (hereinafter, indistinctly, 'ALUDEC' or the 'Company' Tax ID (CIF) A-36631075, address in Polígono Industrial A Reigosa Parcela P1, - 36828 Ponte Caldelas (Pontevedra) which can be contacted through the following email address: [protecciondatos@aludec.com](mailto:protecciondatos@aludec.com)

## PURPOSES OF YOUR PERSONAL DATA PROCESSING

We shall process your personal data for the following purpose(s):

1. Consider your application when you send us your CV.
2. Website operation and maintenance management.
3. Observation of your visit and movements through our website, and interaction with the contents.
4. Respond to your requests for information, queries or claims made through the web (contact mail provided on it) or by telephone.
5. Respond and manage commercial proposals made through the web (contact mail provided on it) or by telephone.

## RETENTION PERIOD OF YOUR DATA

The Company shall process your personal data as long as it is necessary, depending on each case.

- We shall keep or a maximum term of 5 years, the CVs considered to be of interest in relation to the technical profiles, and a maximum term of 2 years for non-technical profiles.
- Regarding queries and claims, we shall retain your data once we have replied, they shall be blocked until the prescription of the eventual responsibilities of our processing.
- With regard to the commercial proposals made, we shall treat your personal data during the term of the contract, and then keep them blocked for a period of 6 years and until the prescription of possible liability claims, unless no agreement is reached, in which case, we shall securely and immediately destroy your personal data.
- With regard to web management processing through cookies, we refer to the Cookie Policy in which you may find detailed information on the permanence or duration of each cookie on your equipment.

## DATA UPDATE

Please notify us immediately of any changes in your data so that the information being processed is always up to date and accurate. In this regard, you represent and warrant that the information and data you have provided are accurate, current and truthful.

## LEGITIMATE BASES OF OUR PERSONAL DATA PROCESSING

The Company processes your personal data for different purposes. Each personal data processing must be based on a legitimate base, among those foreseen in the regulations.

The Group Companies use the following bases:

- a. Consent: You have provided your unambiguous and express consent to the processing of your personal data for a specific purpose.



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b. Legal obligation: The Law requires processing and transfer them occasionally to certain bodies (e.g. Law Enforcement Forces and Agencies).

c. Legitimate interest as long as our interests are not overridden by your interests, rights or freedom.

d. Performance of the contract: Personal data Processing necessary to carry out and manage the company's contractual relationship with you or by your request for pre-contractual measures in this regard.

## A. Consent

The Company sometimes collects your personal data with your previous and unambiguous consent.

E.g. by filling in the application form in the offers of employment on the website.

Consequence of failure to supply data:

Data (and consents) requested are necessary for the processing and purposes indicated, so the omission of any of them shall prevent us from performing the aforementioned purpose. The acceptance of this processing is voluntary and your refusal shall not entail any negative consequence for you.

## B. Legal obligation

The Company is obliged in some cases, by virtue of different legal regulations (regardless of whether or not you give your consent), to process and/or transfer certain personal data to different entities.

E.g. to the Tax Agency or to the Law Enforcement Forces and Agencies, at their request.

## C. Legitimate interest

The Company shall process your personal data based on a real and legitimate interest in doing so and your rights and interests do not override such interest.

E.g. when managing your queries within our group of companies or sharing your CV also within our group of companies.

E.g. when processing your professional location data as a contact person for a company.

## D. Performance of a contract

The company shall process your personal data in order to manage, if agreed, the contractual relationship with you as a consequence of the proposal sent to the company.

E.g. if a commercial contract is signed with you.

## RECIPIENTS

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The Company shall transfer your personal data to third parties in the following cases:

a. Consent. In the event that you give your consent for this purpose.

b. Assignment by legal obligation. In the event that the Company is obliged by law.

c. Assignment for legitimate interest. Your CV data shall be transferred to the rest of the group company in Spain: ALUDEC Galvanic, S.A., ALUDEC Stamping, S.A., ALUDEC Inyección, S.A., ALUDEC Componentes, S.L.

## PROVISION OF SERVICES BY THIRD PARTIES WITH ACCESS TO PERSONAL DATA

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In some cases, we have external companies or providers, who access your personal data, to collaborate with us by providing specific services (specifically computer support and hosting of this website).

With all these companies, the Company signs the corresponding confidentiality and personal data protection contract to guarantee that the use of the data to which we give access for the provision of the service is carried out in compliance with current laws on data protection.

The list of providers who have access to your personal data, as well as the services provided by each one, is at your disposal by request to the legal department through the email address provided in this document.

## INTERNATIONAL DATA TRANSFER

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Under no circumstances shall your data be transferred without your explicit consent, to companies in our group (or third parties) located outside the European Economic Area or that do not apply regulations providing for personal



data protection measures analogous to those in force in the European Union

Specifically, some of our providers offer services from outside Spain, but the company has made sure to choose companies that offer adequate guarantees equivalent to those covered in the European Union by the General Data Protection Regulations: For example, Microsoft, an American company attached to the 'Privacy Shield' in compliance with article 46.2.a) of the RGPD.

## SECURITY

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ALUDEC takes all necessary security, technical and organizational measures to protect your personal data against loss or abuse. For example, your data is stored in a secure operating environment without public access. In some instances, your personal data is encrypted using Secure Socket Layer (SSL) technology during transmission. This means that an approved encryption procedure is used for communication between your computer and the ALUDEC servers, as long as your browser supports SSL.

If you wish to contact ALUDEC by email, please note that we cannot guarantee the confidentiality of the information sent. Third parties can read the contents of email messages. Therefore, we recommend that you send us confidential information by regular mail only.

## YOUR RIGHTS REGARDING OUR PROCESSING OF YOUR PERSONAL DATA

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Regarding your data processed by the Company, you have:

In any case, the following rights:

- Transparency about how we use your personal data (right to be informed). Right that we fulfil, for example, through this legal text.
- Right to request a copy of the information we have about you, which shall be provided to you within one month (right of access).
- Right to update or modify information we have about you if it is incorrect (right of rectification).
- Right to request that we cease using your information while a claim brought by you is being resolved, among other things (right to restriction of processing).

- Right to be informed of automated decision procedures, including profiling

In addition, when we process your personal data based on your consent or our contractual relationship with you:

- Right to request that we remove your personal data from our records (right of erasure or 'right to be forgotten').
- Right to obtain and reuse your personal data for your own purposes (right to data portability).
- Right to revoke at any moment your consent previously given to any of our processing of your personal data.

Or when we process your personal data based on our legitimate corporate interests:

- Right to object to the processing of your personal data based on our legitimate interests claiming circumstances based on your personal situation (right to object).

## EXERCISING OF RIGHTS

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You may exercise your applicable rights in each case, notifying the Company by any of the following means:

a. Going in writing together with a scan of your ID card, to the following email address:  
[protecciondatos@aludec.com](mailto:protecciondatos@aludec.com)

b. You can also send us your request by letter with a copy of your ID card and including a visible reference to 'LOPD' on the envelope to:

ALUDEC, S.A. (To: Legal Department) Polígono Industrial A Reigosa Parcela P1, 36828, Ponte Caldelas, (Pontevedra).

You can access the information necessary to exercise all the aforementioned rights (with detailed explanations and forms) on this website provided by the regulatory body: [Spanish Data Protection Agency](#).

You also have the right to file a claim to the Spanish Data Protection Agency (or AEPD), especially in the event that you consider that you have not obtained satisfaction in the exercise of your rights.



## CHANGES TO THE DATA PROTECTION DECLARATION

ALUDEC reserves the right to modify its data protection declaration. ALUDEC shall notify or announce the new content and the dates on which there is a revision of these terms, for the information of its users.