

Secpho wishes to provide its associates and users of our website <http://www.secpho.org/> (hereinafter, the "Website") with this extended privacy policy (hereinafter, the "Privacy Policy"), where we share in a transparent and simple way all the information about the processing that we perform with your personal data, the purposes of those processings and the rights that data subjects may exercise. This Extended Privacy Policy will always be available in our Website [www.secpho.org](http://www.secpho.org/).

### **1. WHO ARE WE AND HOW CAN YOU CONTACT US?**

The entity responsible for the personal data processing is SOUTHERN EUROPEAN CLUSTER IN PHOTONICS AND OPTICS (hereinafter referred to as "secpho"), established in accordance with Spanish law, with registered office at Rambla Sant Nebridi 10, 08222 Terrassa (Barcelona) and holder of CIF number G-65103905. If you have any questions about the processing we carry out of your personal data, you can contact us via email [info@secpho.org](mailto:info@secpho.org).

### **2. WHAT IS A PERSONAL DATA AND WHAT IS A PROCESSING OF PERSONAL DATA?**

Personal data is any information about an identified or identifiable natural person. Any person whose identity can be determined, directly or indirectly, in particular by an identifier, such as a name, an identification number, location data, an online identifier or one or more elements of that person's physical, physiological, genetic, psychic, economic, cultural or social identity, shall be considered an identifiable natural person. The processing of personal data is any operation or set of operations that we carry out on your personal data, such as the collection, registration, retention, use and communication of your data.

### **3. WHAT PERSONAL DATA DO WE COLLECT FROM YOU?**

In order to carry out the personal data processing that we specify in this Privacy Policy, we need to collect certain information about the representatives of the associates and users of our Website (hereinafter, the "Data Subjects"). Therefore, we collect the information provided to us by Data Subjects through secpho's different channels of interaction and communication for each data processing. The data we may collect are the following ones:

- first and last name, professional address, email address, telephone number, image and position within the organization chart of the associate;
- CV, work experience and academic record;

- information about your use and navigation of the Website (website from which you arrive on the Website, layers of the same visited, processes initiated and abandoned, IP address, type of device from which to access, Internet browser used, time you have remained on the Website, etc.)
- any other information provided by Data Subjects by contacting us by any means or communication channel.

#### **4. HOW CAN WE COLLECT PERSONAL DATA FROM YOU?**

We may collect information about Data Subjects directly from them through the following means:

- Association application form and provision of services in execution of the association terms and conditions.
- Registration form to participate in our events, activities, congresses, conferences, projects and/or fairs.
- Contact form available in our Website.
- Interaction with secpho when using our contact service or associate service through the different channels we make available to Data Subjects: online form, email and telephone.
- Interaction with the Website and secpho on social networks: through your use of the Website when browsing the Website and through the interaction you may have with secpho through the company's corporate social media profiles such as Facebook, Instagram, LinkedIn or Twitter.

#### **5. WHAT RIGHTS CAN YOU EXERCISE?**

##### **A) Right of access**

You have the right to know if secpho is processing your personal data and, if so, to know what personal data are being processed.

##### **B) Right of rectification**

You have the right to modify your personal data that are inaccurate or incomplete. To do this you must indicate what personal data you want to modify and prove them appropriately.

##### **C) Right to object**

In the legally envisaged cases you can object at any time, for reasons related to your particular situation, to our processing of your data. Thus, you can object to us performing marketing, advertising and sending of advertising and promotional communications by electronic means, by contacting [the info@secpho.org](mailto:the_info@secpho.org) or by following the instructions you will find at the end of each of these communications.

##### **D) Right to erasure**

You have the right to erasure your personal data. This does not mean that your data are completely deleted, but that your data will be kept blocked in such a way as to prevent its processing, without prejudice to its making available to public administrations, judges and courts for the attention of possible responsibilities that have arisen as a result of the treatment during the limitation period of the latter.

##### **E) Right to data portability**

You have the right to receive and/or transfer to another controller other than secpho the personal data that concerns you and that you have provided to us.

**F) Right to restriction of processing**

You have the right to ask us to suspend the processing of your data when (i) you have challenged the accuracy of your data, while secpho verifies such accuracy; or (ii) you have exercised your right to object to the processing of your data, while verifying whether secpho's legitimate reasons prevail over yours as a data subject. Likewise, this right allows you to ask secpho to keep your personal data when (i) the processing of data is unlawful and as a data subject you object to the deletion of your data, requesting instead a limitation of its use; or (ii) secpho no longer needs your personal data for the purposes of the processing, but needs it for the formulation, exercise, or defense of claims.

**G) Right not to be the subject of a decision based solely on automated treatments that produces legal or similar effects on the affiliate**

You have the right not to be the subject of a decision based solely on the automated processing of your data, including profiling, where such decision produces legal or contractual effects that affect you. At secpho we do not carry out this type of processing of personal data.

You can exercise your rights by sending us your request to the following email address [info@secpho.org](mailto:info@secpho.org) without crediting your identity. We also inform you that, in the event that you consider that we do not have properly satisfied the exercise of your rights, you can file a complaint with the Spanish Data Protection Agency (AEPD), please contact its website <http://www.aepd.es>.

## **6. WHAT DO WE PROCESS FOR YOUR PERSONAL DATA?**

In order to be able to report in a transparent and detailed way about the purposes for which we process your personal data we have proceeded to separate the information related to each processing into separate tables. Thus, you can find all the specific information of each of the processing we carry out of your personal data in its corresponding table individually. Each descriptive table of the corresponding treatments contains the following information:

➤ **For what purposes do we process your personal data?**

In this column we explain for what purposes do we process for your personal data.

➤ **On what legal basis do we process your personal data?**

This column explains the legal basis or justification that allows us to treat your personal data lawfully. Data protection regulations require us to process your data on a legal basis or justification that legitimizes such processing. Thus, to process your personal information we

may rely on different bases or legal justifications depending on the processing we carry out of your data. The legal bases for the processing of your personal data may be:

- **Legitimate interest:** secpho may have a legitimate interest in performing certain processing of the personal data of the representatives of the Data Subjects. In any case, this legitimate interest is based on an analysis of the proper balance of our interests in processing your personal data and your rights and freedoms. The result of such analysis will determine whether or not we may use your personal information for the processing described in this Privacy Policy.
- **The execution of a contract:** Certain processing of personal data that secpho performs may be a condition necessary to comply with the general conditions of association with secpho. In order to be able to process the partnership request and manage participation in the services and benefits derived from partner status, secpho needs to collect and process data of Data Subjects nature. Thus, the refusal to provide us with those personal data that are necessary to execute the general conditions of association with secpho or to carry out data processing inherent therein by a Data Subject, will imply the impossibility of the afore mentioned Data Subjects Party may be part of it.
- **Fulfillment of a legal obligation:** secpho acts as responsible for the personal data of the Data Subjects and must comply with a series of obligations imposed by accounting, tax, commercial regulations, crime prevention, etc. In cases where the legal justification for the processing of personal data is compliance with a legal obligation, the Data Subjects may not object to its processing.
- **Your consent:** In the event that secpho wishes to carry out any processing of your data whose legal justification cannot be based on any of the reasons explained above, we will request your consent prior to such processing. In any case, we will inform you duly in advance of all aspects derived from such processing and you can always withdraw your consent once you have provided it. This is the case, for example, the processing of queries through the contact form available on the Website.

➤ **How long do we keep personal data?**

This column provides guidance for how long t us data will be retained. The storage time will depend in any case on the processing carried out on to personal information. Please note that certain accounting, tax and data protection regulations, among others, may require us to retain certain data of Data Subjects for a certain period of time.

You will find described in more detail the different personal data processing carried out by secpho in the following sections:

## 1. Management of the relationship with the associates

For what purposes do we process your data?	On what legal basis do we process your data?	How long do we keep your personal data?
<ul style="list-style-type: none"> <li>• Correctly process the application for registration of new associates;</li> <li>• Manage the association relationship, i.e. collection of the registration and association fee, invitation to events, activities, fairs, congresses and conferences; management of participation in technological innovation projects and, in general, implementation of the benefits and provision of the services inherent in associate status; and</li> <li>• Provide service to the associates.</li> </ul>	<p>Execution of the general conditions of association to which the associate is a party.</p>	<p>Your personal data will be processed by secpho while the relationship between secpho and associate is in force.</p> <p>Subsequently, the personal data provided will be kept duly blocked for the legally stipulated period of (i) prescription of the actions that may arise as a result of the relationship between secpho and the partner and / or user; and (ii) retention of the information by legal imperative.</p> <p>Once the maximum period of data processing has arrived, secpho will anonymize or delete the personal data of the Data Subjects.</p>

## 2. Management of the contact form for users of the corporate website

For what purposes do we process your data?	On what legal basis do we process your data?	How long do we keep your personal data?
<ul style="list-style-type: none"><li>• Process the request for information or sending of consultation, the application for employment or the registration to an event sent by the user of the corporate website through the corresponding contact forms available in it.</li></ul>	Consent of the user of the corporate website.	<p>Your personal data will be processed by secpho for the time necessary to process the corresponding application submitted in each case, except in the event that there are no vacancies to be filled in the case of sending cv, in which case secpho will automatically delete the personal data of the Data Subjects.</p> <p>Subsequently, the personal data provided will be kept duly blocked during the legally stipulated limitation period of the actions that may arise as a result of the relationship between secpho and the Data Subjects.</p> <p>Once the maximum period of data processing has arrived, secpho will anonymize or delete the personal data of the Data Subjects.</p>

### 3. Marketing and advertising and sending commercial communications by electronic means

For what purposes do we process your data?	On what legal basis do we process your data?	How long do we keep your personal data?
<ul style="list-style-type: none"><li>• Conduct online and social media advertising of secpho services (remarketing cookies); and</li><li>• Send users commercial communications by electronic means (mms, sms, email, etc.) for advertising purposes about services, information, news and events organized by secpho.</li></ul>	User or associate's consent or, where applicable, secpho's legitimate interest in maintaining a commercial communication with its partners in order to provide and keep them informed about their services, news and events.	<p>Your personal data will be processed by secpho as long as you do not exercise your right of opposition or deletion.</p> <p>In the event that you exercise such rights, the personal data provided will be kept duly blocked during the legally stipulated period of limitation of the actions that may arise from the processing.</p> <p>Once the maximum period of data processing has arrived, secpho will anonymize or delete the user's personal data.</p>

#### 4. Maintenance of updated suppression lists to avoid contact

For what purposes do we process your data?	On what legal basis do we process your data?	How long do we keep your personal data?
<ul style="list-style-type: none"><li>Keep on a suppression list with the confirmation of those users who have objected to the sending of our commercial communications or have requested the cancellation of their personal data.</li></ul>	<p>Legal obligation: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and the free movement of such data and repealing Directive 95/46/EC obliges us to respect your rights and maintain evidence of our compliance with your request for the exercise of the right of cancellation.</p>	<p>We will retain your personal data for the legally provided period and, subsequently, during the limitation period for the filing of any claim in relation to our effective or poor response to the right of deletion or opposition that we have exercised.</p> <p>Once the maximum period of data processing has arrived, secpho will anonymize or delete the user's personal data.</p>



## 5. Analysis of the use, operation and improvement of the corporate Website

For what purposes do we process your data?	On what legal basis do we process your data?	How long do we keep your personal data?
<ul style="list-style-type: none"> <li>• Maintain security and protect the Web Site from malicious uses.</li> <li>• Analyze the most common uses of the Website, assess the effectiveness of your layers, detect the dates/times of greatest influx of users and detect browsing patterns.</li> <li>• Study possible improvements to the Web Site to optimize usability and user experience on the corporate website and implement them.</li> <li>• Display the content of the site Web correct and requested by the user at any time.</li> </ul>	<p>User Consent.</p>	<p>We will retain your personal data for as long as each type of cookie needs or until you withdraw your consent or exercise your right of opposition.</p> <p>Once the maximum period of data processing has arrived, secpho will anonymize or delete the user's personal data.</p>

## **6. WHO DO WE SHARE WITH YOUR PERSONAL DATA?**

In execution of the association terms and conditions and where necessary, secpho shall communicate the contact details of the representatives of the partners to other secpho partners or to the relevant third parties for the sole purpose of managing the request submitted by the partner in each case. Other possible third parties to which we may communicate your data, upon legal, judicial or administrative request and / or necessary compliance with a legal obligation that legitimizes the communication:

- Legal advisors
- Courts and Tribunals
- Tax Administration
- Governance agencies and Public Administrations
- Security forces and bodies
- Spanish Data Protection Agency

We may also communicate your personal information in the following cases:

- If we or substantially all of our assets are acquired by a third party in which case, the personal data we hold from our partners and users will be one of the transferred assets. Any such operation will be reported and communicated.
- To protect the security of the rights of our staff, our associates and users and our information systems and defend the interests of the company itself. This includes exchanging information with law entices or tribunals in cases of fraud detection, identity theft or any other use, treatment or unlawful act.

## **7. WHO CAN ACCESS YOUR PERSONAL DATA?**

Secpho informs you that we work with third-party providers whose services are necessary for the correct presentation, usability and maintenance of the Website and our information systems and that, in order to render those services, they may need to have access to your personal data. This is the case, for example, of services providers who help us improve and optimize our Website, technology service providers or suppliers or those who provide us with maintenance services for our databases and information systems. Secpho signs the corresponding data processing agreements with all its data processors.

## **8. ARE YOUR PERSONAL DATA SAFE AND SECURE?**

In order to ensure the fair and transparent processing of tor personal information, we will adopt appropriate procedures that will include the implementation of technical and organizational measures that take into account the potential risk and correct any inaccuracies identified in the personal data processed, so that the risk of any error is minimized, processing your personal data fairly and securely. We do not transfer your personal data outside the European Economic Area.

All information you provide to us is stored in secure servers. Thus, once we have received all your information we will use strict security procedures to try to prevent any unauthorized access. Unfortunately, the transmission or communication of information over the Internet is not secure.

Likewise, we ensure that our service providers also enjoy adequate security standards for the protection of personal data for which they have or may become accessed, in compliance with the applicable data protection legislation in force at all times.

## **9. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may vary over time due to possible changes in criteria followed at any time by the Spanish Data Protection Agency or other supervisory authorities, legislative changes that may take place and jurisprudence that apply to this privacy policy. Secpho therefore reserves the right to modify this Privacy Policy in order to adapt it to these criteria, as well as to jurisprudence or legislative developments.

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