

## **Commercial communications**

GÓMEZ-ACEBO & POMBO informs you about the following aspects of data protection:

- (1) Data controller: GÓMEZ ACEBO & POMBO ABOGADOS, S. L. P. (hereinafter, GÓMEZ-ACEBO & POMBO), with registered office at Paseo de la Castellana, 216, 28046 Madrid (Spain), with contact telephone number 91 582 91 00 and with e-mail address <a href="mailto:dpo@ga-p.com">dpo@ga-p.com</a>, is the controller of the data collected in the registration form for alerts.
- **(2) Data Protection Officer:** The contact e-mail address of the Data Protection Officer of GÓMEZ-ACEBO & POMBO is <a href="mailto:dpo@ga-p.com">dpo@ga-p.com</a>.
- (3) Obligatory or voluntary nature of the communication of data: The completion of the form is voluntary and the consequence of not providing your data will be the impossibility of receiving the alerts.
- (4) Purposes of and entitlement to processing:
  - (a) Processing based on the consent of the data subject:
    - GÓMEZ-ACEBO & POMBO will understand that you expressly consent to the processing of your data for the reception of commercial communications by electronic means of legal publications, commentaries and analyses of GÓMEZ ACEBO & POMBO by checking the box on the form included for this purpose.
  - (b) Processing based on legitimate interest:
    - Your data will be processed, according to the legitimate interest of GÓMEZ ACEBO & POMBO, to keep your minimum essential data in order to identify you and to adopt the necessary measures to avoid sending commercial and advertising communications when you object or revoke your consent to GÓMEZ ACEBO & POMBO sending you commercial and advertising communications.
- (5) Recipients: The data will be sent to third parties outside GÓMEZ-ACEBO & POMBO (data processors) who will have access to the data in order to provide ancillary services to GÓMEZ-ACEBO & POMBO that involve support functions necessary for the business activity and the main processing mentioned under "Purposes of and entitlement to

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processing". The data shall be made available to said processors under a service contract and a contract for processing in accordance with data protection legislation.

## (6) International data transfers:

Your data may be communicated to the different offices of GA\_P - which you can view at http://www.gomezacebo-pombo.com/index.php/es/oficinas - which may be located inside or outside the European Economic Area, as is the case of the GA\_P office in New York.

In this respect, GA\_P has taken all the necessary legal steps to ensure that the transfer of data to these countries is secure and in accordance with the provisions of the applicable legislation and has executed the appropriate standard contractual clauses for the purpose of securing the international transfer of data.

Similarly, your data may be accessed by service providers and suppliers with whom we have concluded the relevant contracts where necessary to ensure the relationship of GA\_P with contacts and clients. In any event, the necessary legal and organizational measures shall be adopted to ensure security of and access to the data

(7) Data retention period: GÓMEZ-ACEBO & POMBO will keep your data until you request its erasure or revoke the consent given.

## (8) Rights: You have the following rights:

- Rights of access, rectification, erasure, limitation, objection and, where legally applicable, portability, which can be exercised by sending a request to the Departamento de Innovación y Desarrollo de Cliente (Innovation and Client Development Department) of GÓMEZ ACEBO & POMBO, at the following address: Paseo de la Castellana, 216, 28046 Madrid (Spain), or to the e-mail address dpo@gap.com, indicating the right being exercised and providing documentary proof of identity.
- The right to revoke your consent without retroactive effect or to object to the receipt
  of commercial communications by sending an e-mail to the following address:
  <a href="mailto:dpo@ga-p.com">dpo@ga-p.com</a> (indicating in the subject line "BAJA/UNSUBSCRIBE").

And the right to lodge a complaint with a supervisory authority (in Spain, Agencia Española de Protección de Datos, calle de Jorge Juan, 6, 28001 Madrid; <a href="www.agpd.es">www.agpd.es</a>; telephones: 901 100 099 and 912 663 517), in particular in relation to the exercise of the aforementioned rights.

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