Privacy Policy

This Privacy Policy has been developed taking into account the provisions of current data protection regulations: Regulation 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 on the movement of such data, (hereinafter referred to as GDPR); and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (hereinafter LOPDGDD).

The purpose of this Privacy Policy is to inform the owners of the personal data regarding which information is being collected, of the specific aspects related to the processing of their data, among other things, the purposes of the processing, the contact details to exercise the rights that assist you, the periods of conservation of the information and the security measures, among other things.

Data Controller

Company name: MANUFACTURING AND DEVELOPMENT OF

TRAILERS, S.L.U (FABRISEM, hereinafter)

Address: Polígono Malpica, Calle F, 18

50016 Zaragoza

CIF: B99274862

Telephone: (+34) 976 39 17 07

email: fabrisem@fabrisem.com

Data processing

The personal data requested, if applicable, will consist only of those strictly essential to identify and respond to the request made by the owner of the same, hereinafter the interested party. Such information will be processed fairly, lawfully and transparently in relation to the data subject. On the other hand, personal data will be collected for specific explicit and legitimate purposes, and will not be subsequently processed in a manner incompatible with these purposes.

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

The owner of the data will be informed, prior to the collection of their data, of the general points regulated in this policy so that they can give express, precise and



unequivocal consent for the processing of their data, if necessary and in accordance with the following aspects.

Purposes of processing.

The explicit purposes for which each of the processing processes are carried out are set out in the information clauses incorporated in each of the data collection channels (web forms, paper forms, contracts, posters, etc.).

However, in general, the purpose of data collection and processing is to:

- The maintenance of the contractual relationship established between the owner of the data and FABRISEM.
- The execution, maintenance and management of any relationship that FABRISEM and the Data Subject may maintain: commercial, administrative, accounting, labor, marketing, and any other provision of services that may be requested from FABRISEM by the Data Owner.
- Respond to requests for information and/or contact.
- Management of the self-applications for employment that are received.
- The sending of advertising and promotional information relating to FABRISEM's own products, provided that you have given your consent to do so or that there is a previous commercial/contractual relationship and it refers to the sending of commercial communications referring to products or services similar to those that were initially contracted with the customer (article 21.2 of Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce).

Under no circumstances will they be used for purposes other than those for which they were collected.

Legitimation

As a general rule, prior to the processing of personal data, FABRISEM obtains unequivocal consent from the owner of the same, through the incorporation of informed consent clauses in the different information collection systems.

However, in the event that the consent of the interested party is not required, the legitimate basis of the processing on which FABRISEM is based is the execution of the contractual relationship established, our legitimate interest in the development of the business, in the case of commercial promotion and prospecting or compliance with a law that authorizes or requires the processing of the data of the interested party.

If your consent has been requested for any of the processing that we are going to carry out (such as sending information about products and services), we inform you that you can withdraw it at any time.

Recipients



As a general rule, FABRISEM will not inform any third party about your personal data, unless the Owner has given his or her consent for such purposes, when the transfer is authorized by law or in the cases of entities with which we maintain a relationship and by virtue of data processor contracts entered into with them.

International Data Transfers

International data transfers are not envisaged.

Retention periods

The information collected from the interested party will be kept for as long as it is necessary to fulfill the purpose for which the personal data was collected, so that, once the purpose has been fulfilled, the data will be cancelled. Such cancellation will result in the blocking of the data, which will only be kept at the disposal of the Public Administrations, Judges and Courts, in order to deal with possible liabilities arising from the processing, during the limitation period of these, once the aforementioned period has elapsed, the information will be destroyed.

For information purposes, the following are the legal periods for the retention of information in relation to different matters:

DOCUMENT	TERM	REF. LEGAL
Accounting and tax documentation for commercial purposes	6 years	Art. 30 Commercial Code
Accounting and tax documentation for tax purposes	4 years	Articles 66 to 70 of the General Tax Law
Job Seeker Data	2 years	Not applicable
Data for sending information about products and services	As long as the interested party does not request its deletion	Not applicable

Browsing data.



In relation to the browsing data that may be processed through the website, in the event that data subject to the regulations is collected, it is recommended to consult the <u>Cookies Policy</u> published on our website.

Rights of Data Subjects.

Any person has the right to obtain confirmation as to whether or not FABRISEM is processing personal data concerning them.

Data subjects have the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

In certain circumstances, data subjects may request the restriction of the processing of their data, in which case we will only keep them for the exercise or defence of claims.

In certain circumstances and for reasons related to their particular situation, data subjects may object to the processing of their data. In this case, FABRISEM will cease to process the data, except for compelling legitimate reasons, or the exercise or defence of possible claims.

Interested parties may exercise the rights indicated by writing to FABRISEM at the following address: Pol. Malpica, Calle F, nº 18 - 50016 Zaragoza, or to the e-mail address fabrisem@fabrisem.com, attaching in any case a photocopy of their ID card or equivalent document valid in law that allows them to prove their identity.

You also have the possibility of filing a complaint with the Spanish Data Protection Agency (aepd.es) in the event that you consider that the processing of your data is not being adequate.

