

## Privacy Policy

Gezien het Internationale karakter van deze wetgeving verkiezen we ons aan de originele Engelse versie te houden.

### **PRIVACY POLICY**

This Privacy Policy was last revised on 27th January, 2021.

#### **INTRODUCTION**

SUBLICASA (also referred to as “we”, “us” or “our”) understands that you are aware of and care about your personal privacy interests, and we take that seriously. We will fully comply with all applicable Data Protection and consumer legislation from time to time in place. This Privacy Policy describes SUBLICASA’s policies and practices regarding its collection and use of your Personal Information, and which rights you have regarding them. SUBLICASA is the data controller for the Personal Information being processed by on [WWW.SUBLICASA.COM](http://WWW.SUBLICASA.COM)

#### **CATEGORIES OF PERSONAL DATA**

The following categories of personal data are processed when using our services: Name, e-mail, home address, telephone number, business name etc.

We create Sublicasa SL related campaigns, such as using “custom audiences through Facebook. Consider, for example, “adjusted target groups” based on the behavior on our website or based on an e-mail address. E-mail addresses are provided and anonymised to create target groups that we want to approach with our advertisements via Facebook. We then receive reports on this with anonymised data. (Personalized) advertisements can be displayed on these platforms. We do not pass on personal data to third parties for this, unless you have unambiguously given permission.

#### **PURPOSE**

We use your information in order to:

Create things that are relevant to you.

For statistical or survey purposes to improve this website and its services to you.

Enable you find services and information quickly.

Ensure that you don’t have to add information more than once, this makes the website easier for you to navigate through’

Send you email about our services.

You agree that you do not object to us contacting you for any of the above purposes whether by telephone, e-mail or in writing and you confirm that you do not and will not consider any of the above as being a breach of any of your rights under the General Data Protection Regulation (GDPR).

## **CONSENT**

You will be able to make use of our website even if you do not want to provide your personal information, but your access will be limited.

However, if you decide to provide your personal information, you will be able to select the kinds of information you want to receive from us by subscribing to various services. You have the choice of selecting the option stating that you do not wish to receive messages about our other offers or services.

## **COOKIES**

This Website uses cookies to monitor browsing preferences. A cookie is a computer file containing information about a user that is sent to the central computer with each request. The server uses this information to customize data sent back to the user and to log the user's requests.

Our website includes buttons for Facebook, and Instagram to promote web pages (including "like", "pin") or share (including "tweet") on social networks such as Facebook and Instagram. These buttons work using pieces of code coming from Facebook and Instagram themselves. Cookies are placed through this code. The social media buttons can also store and process certain data, so that personalized advertisements can be shown to you.

Read the privacy statement of these parties (which can change regularly) to know what they do with your (personal) data that they process via these cookies. The information they collect is anonymised as much as possible. Facebook and Instagram are located in the United States. If you do allow cookies to be used, the following personal information may be stored by Sublicasa:

Date and time of visits.

Pages viewed.

Time spent at our Website.

Websites visited before and after our Website.

Your IP address.

IP address is a number used by computers on the network to identify your computer. IP addresses are automatically collected by our web server as part of demographic and profile data.

## **ENFORCEMENT**

If for any reason you believe that SUBLICASA has not complied with this privacy policy, please notify us by email, and we will do our best to determine and correct the problem promptly. Be certain that the words Privacy Policy are in the Subject line.

## **LEGITIMATE INTEREST**

SUBLICASA will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on SUBLICASA or the site (b) protect and defend the rights or property of SUBLICASA and its family of Websites, and (c) act in urgent circumstances to protect the personal safety of users of SUBLICASA its Websites, or the public.

## **DATA STORAGE AND RETENTION**

Your personal data is stored and processed for as long as it is necessary, after that it will be deleted. Note that we might process your personal data for an extended period of time if it is necessary in order to comply with a legal obligation.

## **LINKS TO THIRD PARTY SITE**

The links in this area will let you leave SUBLICASA site. The linked sites are not under the control of SUBLICASA and SUBLICASA is not responsible for the contents of any linked site or any link contained in any linked site, or any changes or update to such sites. SUBLICASA is not responsible for any webcasting or any other form of transmission received from such linked site. SUBLICASA is providing these links to you only as a convenience, and the inclusion of any link does not imply endorsement by SUBLICASA of the site.

## **DATA SUBJECT RIGHTS**

By virtue of the General Data Protection Regulation (GDPR) our website users have, with certain statutory exceptions, multiple rights with regard to SUBLICASA's processing of personal data. Users have:

- (1) the right to request access to their personal data and to find out how they are processed;
- (2) the right to correct or complete incorrect or incomplete information;
- (3) the right to delete personal data for data processed illegally where the lawful basis is consent;
- (4) the right to restrict personal data processing;
- (5) the right to transfer personal data in electronic format (data portability);
- (6) the right to object to personal data processing based on the legitimate interest of SUBLICASA.

Users have the right at any time to withdraw consent previously given regarding SUBLICASA processing of users personal data.

## **AGREEMENT AND LITIGATION**

By using SUBLICASA website and our services you agree to the terms and conditions contained in this Privacy Policy and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use SUBLICASA website. You agree that any dispute over privacy or the terms contained in this Privacy Policy, or any other agreement we have with you, will be governed by the laws of SPAIN You also agree to arbitrate such disputes in SPAIN and to abide by any limitation on damages contained in any agreement we may have with you.

## **USERS FROM OUTSIDE SPAIN**

Please note that if you are a user from outside SPAIN, your information may be processed, stored and transferred in SPAIN where our central database is operated. There is a possibility that the data protection laws operating in SPAIN might not be as encompassing as those in your country, however, we assure you that we will take steps to ensure that your privacy is protected.

## **DATA BREACH**

SUBLICASA has taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honored. We take strong precautions to protect your data from loss, misuse, unauthorized access or disclosure, alteration, or destruction.

However, in the event of unforeseeable circumstances leading to data breach, you will be informed of such data breach within 72 hours of identifying the breach.

## **CHANGES AND UPDATES TO THE PRIVACY POLICY**

As our services may change from time to time, this Privacy Policy is expected to change as well. We reserve the right to amend the Privacy Policy at any time, for any reason, without notice to you, other than the posting of the amended Privacy Policy at [WWW.SUBLICASA.COM](http://WWW.SUBLICASA.COM). We may e-mail periodic reminders of our notices and terms and conditions and will e-mail users of material changes hereto, but you should check our site frequently to see the current Privacy Policy that is in effect and any changes that may have been made to it. The provisions contained herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions that govern the use of this site.

## **CONTACT DETAILS, COMPLAINTS AND QUESTIONS**

If you have any questions regarding our Privacy Policy you can contact us through our contact form. If you feel like your concern has not been resolved, you can also lodge a complaint with the concerned supervisory authority in your country.