

DATA HANDLING

Identity of those in charge of Data Handling

- **Identity:** FACEPHI BIOMETRÍA SA, (FacePhi), CIF A-54659313, registered with the Registro Mercantil de Alicante, Tomo 3634, Folio 63, Hoja A-131726.
- **Address:** Calle México, 20, ED. MARSAMAR 3ºC – 03008 ALICANTE.
- **Telephone:** +(34) 965 108 008
- **Data Protection Officer:** The Data Protection delegate is in charge of ensuring compliance with the data protection regulations in the FACEPHI Portals. Their contact address is dpo@facephi.com

Personal data categories

The following data included in different categories of information may be collected, within the framework of a communication:

- Identification data, such as name and surname, contact data and data relating to the status of employee, the Reported Party and the Interested Party.
- Reported breaches.
- Documentation that proves the reported breaches

Purposes

Personal data will be processed, solely and exclusively, for the purpose of managing and dealing with claims and/or complaints related to the activity of FacePhi, notified through the Ethical Channel, in order to detect possible crimes and prevent the imposition of any type of responsibility to FacePhi. Also, it will be processed to avoid any type of conduct contrary to the internal or external regulations of the entity.

The communicated facts or actions must have an effective labour, commercial or professional relationship that directly links the person being reported to FacePhi.

Legitimation

The legal basis for the processing of data is express consent from the providing party, which will be provided once these conditions of service have been accepted on first access to the communications platform.

The data may only be used for the purposes set out in the previous section, in accordance with the principles of transparency and limited purposes.

In some cases, the existence of a public interest (article 6.1 and GDPR) in preventing and acting against infractions of the applicable legislation and, in other cases, the contractual relationship or the legitimate interest that FacePhi has in pursuing and preventing actions that contravene the aforementioned FacePhi policies will come into effect.

Recipients

FacePhi will not transfer the User's personal data to any third party without a legal basis that legitimises this transfer.

User data will only be communicated to the following categories of recipients:

- Courts and Tribunals, as well as other possible bodies for the resolution of conflict.
- State Security Forces and Bodies.
- Notaries and registrars.

The organisation has signed contracts of confidentiality and customised processing of necessary personal data required by the regulations to protect privacy (article 28.3 GDPR) for suppliers that need to access personal data for the provision of services contracted, or for those that due to the operation of our electronic services (web page and emails) may have access to certain personal data.

Period of storage

We will keep your data for a maximum period of three months after notification of the irregularity if the facts have not been proven, as long as they are not necessary for other purposes or for the purposes of proof of due control and supervision in the prevention of crime. In the event that the facts are proven or with sufficient evidence, the data will be kept for as long as necessary for the exercise, by the entity, of its rights before the Courts of Justice. When this is no longer necessary, they will be deleted with the appropriate security measures to guarantee the anonymisation of the data or the total destruction of the same.

Rights

The User may revoke the consent given in their case and exercise their rights of access, rectification, deletion, opposition, portability and limitation, by contacting FACEPHI, via email at dpo@facephi.com

- **Right of access:** You have the right to request FacePhi to confirm whether it is handling your personal data and, if so, to request access to it. The access data includes – among others – the purposes for use, the categories of personal data affected, and the recipients or categories of recipients to whom the personal data have been or will be communicated. You may obtain a copy of the personal data that is being processed.
- **Right to rectification:** You have the right to request FacePhi rectify incorrect or incomplete personal data.
- **Right of deletion (right to be forgotten):** You have the right to request that FacePhi delete your personal data.
- **Right to limit handling:** You have the right to request the limitation of the handling of your personal data, although FacePhi will carry out a case-by-case analysis to determine if the exercise of said right is appropriate.
- **Right to Portability:** The right to receive the personal data that you have provided and transmit it to another person, without FacePhi being able to prevent it.
- **Right of opposition:** When certain circumstances are met, you will have the right to oppose the use of your personal data.

The User will also have the right to make a complaint or claim to the AEPD (Spanish Data Protection Agency). More information can be found at www.aepd.es