

## Data Privacy Policy

We take the protection of your personal data very seriously and, therefore, process your personal data confidentially and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and Organic Law 3/2018 of 5 December on the protection of personal data and the guarantee of digital rights.

Below you will find information about the processing of your personal data by Granollers Transport SL in order to provide bicycle hire services in the municipality of Eivissa, as well as the way in which it is carried out.

### 1. Data controller

- Company name: Granollers Transport SL
- Tax ID: B08404238
- Address: Plaça Tetuan núm. 30, 08010, Barcelona
- Tel: (+34) 902 13 00 14
- Email: info@sagales.com

### 2. Data processor

For the optimal provision of the service that Granollers Transport SL offers, your personal data will be transferred to the entity Nextbike GmbH, whose registered office is located at Erich-Zeigner-Allee No. 69-73, 04229 Leipzig ([kundenservice@nextbike.de](mailto:kundenservice@nextbike.de)), which manages the electric bicycle hire and registration platform.

More information about Nextbike GmbH and its privacy policy can be found at <https://www.nextbike.de/en/privacy/>.

### 3. Collection, processing and use of your personal data

‘Personal data’ shall be understood as any information relating to an identified or identifiable natural person (hereinafter referred to as the ‘data subject’); an identifiable natural person is any person whose identity can be established, either directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier or one or more elements specific to that person's physical, physiological, genetic, mental, economic, cultural or social identity.

Only personal data necessary for the correct provision of the service will be collected, e.g. name, address, date of birth, telephone number, email, bank details and payment card information of the data subject; monthly billing cost; the number of bicycles used; and records of enquiries made about your contract or the service provided.

Granollers Transport SL wishes to ensure the privacy and confidentiality of your personal data and, to this end, has appropriate technical and organisational security measures to ensure an adequate level of security and to protect your personal data against tampering, loss, accidental or intentional destruction or access by unauthorised persons.

During the registration process or at any other time, you may modify the conditions for the processing of your personal data by accessing the user area of our apps or on our website. You may also make changes by contacting customer service.

#### **4. Purpose of processing**

The personal data provided by the data subject will be used by Granollers Transport SL for the following purposes:

- a) Registration of the data subject in the electric bicycle hire service. Registration may be done on the website or through the service app.

Processing the personal data of the data subject is necessary for the purposes of the contract between said party and Granollers Transport SL, as well as for the maintenance, development and realisation of the contractual relationship. Thus, Granollers Transport SL shall process the personal data of the data subject, among others, in order to manage the relationship that it has with them, to determine the price of the service provided, and to manage payments, with the capacity, in certain cases, to make automated decisions based solely on the analytical procedures carried out to improve the provided service that is the subject of the contract with Granollers Transport SL. In order to manage the development of the contract, Granollers Transport SL may process your personal data to perform statistical studies and quality or technical analysis, including satisfaction surveys.

- b) Hire and return of electric bicycles.
- c) Location of the hire bicycles, in order to know what condition they are in and their location at all times.
- d) Billing for services rendered.
- e) If applicable, claims to be made against the person concerned for failure to fulfil their obligations or non-payment of services.
- f) The provision of other additional services, such as managing complaints or queries from the data subject.

On our website we offer the possibility of contacting Granollers Transport SL by email or via a contact form. In this case, the information provided by the data subject will be stored solely for the purpose of processing their correspondence. This data will not be communicated to third parties.

- g) Sending commercial communications via any channel, including electronic means.
- h) Fulfilling obligations that correspond with Granollers Transport SL by legal mandate. On certain occasions, Granollers Transport SL will need to process the personal data of the data subject to comply with certain obligations established by law. Among others, Granollers Transport SL will process personal data in order to comply with the obligations set forth in tax law and existing regulations on the protection of personal data.

Personal data shall not be used for any purpose other than those listed in this Privacy Policy. If Granollers Transport SL would like to use your personal data for any purpose other than that described herein, you will receive a request for your consent, if necessary.

## **5. Legal basis for processing personal data**

- a) The legal basis for processing personal data for the purposes described in points a), b), c) and d) of section 4 is the fulfilment of the contract for the provision of services.

Please note that if you do not provide the personal data requested during registration, Granollers Transport SL cannot provide services.

- b) The legal basis for processing personal data for the purpose described in point h) of section 4 is the need to comply with a legal obligation applicable to Granollers Transport SL.
- c) The legal basis for processing personal data for the purpose described in point g) is the consent requested from the data subject, with a failure to grant it, under no circumstances, conditioning fulfilment of the contract for the provision of services.

Upon registering for our services you will receive additional information about the possibility of revoking your consent at any time, how to revoke your consent, and its impact.

- d) The legal basis for processing personal data for the purposes described in points e) and f) of section 4 is the legitimate interest of the data controller.

## **6. Time limit for storing personal data**

Granollers Transport SL retains the personal data for the duration of the contractual relationship with the data subject and, in all cases, for the period required for the formulation, exercise or defence of potential claims, to comply with obligations on retaining documentation and/or whenever permitted by applicable law.

If the processing of data is based on consent, personal data will be deleted immediately if the data subject revokes the consent given and only one duly blocked copy of such data will be kept in order to comply with the legal obligations of the data controller.

At the end of this period, Granollers Transport SL undertakes to cease the processing of all personal data.

## **7. Recipient of personal data**

As outlined above, Granollers Transport SL will process and transfer personal data to Nextbike GmbH for the correct provision of bicycle hire services.

Likewise, your personal data may be transferred to third parties in order to meet obligations in relation to government authorities, in cases in which this is required in accordance with current legislation at any given time and, where appropriate, in relation to other bodies such as law enforcement agencies, and to judicial bodies or health centres in the case of vital interest.

Finally, your data may be communicated to the following external providers if required for purposes of processing and its correct fulfilment:

- a) Computer suppliers  
b) Call centres and/or telecommunications service providers

- c) Certified file and document destruction companies
- d) External storage services, such as cloud server companies
- e) Commercial providers
- f) Advertising and marketing
- g) Market research
- h) Banks or other payment service providers. Payment transactions using regular payment methods (Visa/Mastercard, direct debit) are carried out exclusively through an encrypted SSL connection. You can recognise an encrypted connection by the fact that the URL in the browser's address bar changes from 'http://' to 'https://' and by the lock symbol that appears in the address bar. In the case of encrypted communication, the payment details you give to us cannot be read by third parties.
- i) Tax consultants/auditors, to certify and review accounting and compliance with legal obligations of a fiscal nature.
- j) Legal advisors

Granollers Transport SL will enter into the corresponding data processing agreements with each of the service providers who have access to your personal data, in accordance with Articles 28 and 29 of the General Data Protection Regulations.

## **8. International data transfer**

We process your personal data in Spain and in the European Union. However, in order to provide some of the services, it may be necessary to transfer your data to providers located outside the European Union (hereinafter referred to as 'third countries').

Only suppliers from third countries who, in the eyes of the European Commission, guarantee an adequate level of protection in accordance with the General Data Protection Regulations, shall be used.

General information on adequacy decisions can be found at [https://ec.europa.eu/info/law/lawtopic/dataprotection/datatransfersoutsideeu/adequacyprotection-personal-data-non-eu-countries\\_de](https://ec.europa.eu/info/law/lawtopic/dataprotection/datatransfersoutsideeu/adequacyprotection-personal-data-non-eu-countries_de); on current adequate safeguards at [https://ec.europa.eu/info/law/law-topic/dataprotection/datatransfersoutsideeu/modelcontracts-transfer-personal-data-third-countries\\_de](https://ec.europa.eu/info/law/law-topic/dataprotection/datatransfersoutsideeu/modelcontracts-transfer-personal-data-third-countries_de) and at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu-us-privacy-shield\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu-us-privacy-shield_de); and on internal data protection regulations at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/bindingcorporate-rules\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/bindingcorporate-rules_de). For further information, please contact our data controller.

### Data transfer to payment service providers

To process our payments we use the WorldPay payment provider for recurring credit card payments. Worldpay (United Kingdom) Limited. Registered in England No. 07316500. Registered office: The Walbrook Building, 25 Walbrook, London EC4N 8AF, United Kingdom. WorldPay Privacy Policy (<https://www.worldpay.com/uk/privacypolicy>).

### Using PayPal as a payment method

If you choose to pay with the PayPal online payment service, as part of your registration process, your contact details will be transferred to PayPal based on the initiated request. The PayPal service is offered by PayPal (Europe) S.a.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, L-2449

Luxembourg. PayPal acts as a provider of online and fiduciary/payment services and offers buyer protection services.

Personal data transferred to PayPal usually consists of your name, surname, address, telephone number, IP address, email address and other data necessary for processing orders, as well as data related to your order, such as the number of items, invoice amount and taxes as a percentage, invoice information, etc.

This transfer is necessary to process your order using the payment method that you have selected, to confirm your identity, and to manage your payment and customer relationship.

Please note, however, that PayPal may also transfer personal data to service providers, subcontractors, or other affiliated companies if this is necessary in order to fulfil their suppliers' contractual obligations or if the personal data will be processed on PayPal's behalf.

Depending on the payment method selected through PayPal, personal data is transferred to the credit agencies by PayPal. This transfer serves to verify your identity and credit rating with respect to the order you have placed. You can find out which credit bureaus are involved and what data is generally collected, processed, stored, and transferred by PayPal in PayPal's data protection statement at <https://www.paypal.com/de/webapps/mpp/ua/privacy-full?locale.x=enDE>.

## 9. Cookies

### What are cookies?

A cookie is a file that is downloaded to your computer or other device when you access certain websites that collect information about your browsing on said website. In some cases, cookies are necessary to facilitate browsing and allow you to store and retrieve information about the browsing habits of a user or their computer, among other things. They can be used to recognise users depending on the information they contain and the way in which they use their computer.

Cookies are essential for the Internet to function properly; they cannot damage the user's computer/device and, if they are enabled in browser settings, they help to identify the user and resolve possible errors related to the website's operation.

### Identifying the different cookies used

By accessing the website, you expressly accept the use of these types of cookies on your device. If you disable cookies, you may not have an optimal browsing experience on the website and some of its available functions may not work properly.

Following the guidelines established by the Spanish Data Protection Agency, the cookies used on this website are classified as follows:

- Session Cookies: These recognise the user and are deleted when you sign out of the website.
- Analytical Cookies: Used to collect information about your activity on the website.
- Social Cookies: Those required for external social networks.
- Affiliate Cookies: These allow visits from other sites to be tracked, through which the website establishes an affiliate contract (affiliate companies).
- Behavioural advertising cookies: Used to collect information about the user's personal preferences and choices (retargeting).

- Technical and functional cookies: These are strictly necessary for use of the website and for the provision of the contracted service.

This website uses third party and proprietary cookies to provide you with a better experience and service. By browsing or using our services you accept our use of cookies.

#### User settings to block cookies

Cookies may be disabled, however, if you select this setting, you may not be able to access certain parts of our website, resulting in less efficient browsing, or you may not be able to take advantage of some of our services.

If you prefer to restrict, block or delete cookies from our website, you may do so by modifying your browser settings. Although the settings for each browser are different, the most common way to do this is through the 'Preferences' or 'Tools' menu. For more details on how to manage cookies in your browser, please refer to the 'Help' menu of your browser.

### **10. Server data**

For technical reasons, your Internet browser may transmit certain files known as server log files to our web service provider with information related to:

- Browser type and version
- Operating system used
- Website from which you are visiting us (reference URL)
- Website you are visiting
- Date and time of access
- Your Internet Protocol (IP) address

This data is anonymous and stored separately from any other personal information you may have provided and, as a result, the user cannot be identified. This data will only be used for statistical purposes in order to optimise our website and our offers.

### **11. Newsletters**

The newsletter is sent via MailChimp, a newsletter distribution platform belonging to the American provider Rocket Science Group (LLC, 675 Ponce De Leon Ave NE # 5000, Atlanta, GA 30308, USA).

You can subscribe to our newsletter via the website. Once you have subscribed, you will receive an email asking you to confirm your request. The newsletter will never be sent unless expressly requested by the data subject, through the corresponding subscription.

Subscriptions to the newsletter are registered in order to prove the registration process meets all legal requirements. This includes storing the login and confirmation time, as well as the IP address. A record is also kept of changes to your data stored in MailChimp.

The email addresses of our newsletter recipients, as well as the additional data described in these guidelines, are stored on MailChimp servers in the United States. MailChimp uses this information to send the newsletter on our behalf. Moreover, MailChimp may use this data in accordance with its own information to optimise or improve its own services, e.g. to technically optimise the sending and presentation of the newsletter or for economic purposes, and to



determine which countries recipients come from. However, MailChimp does not use the data of the recipients of our newsletter to send emails or transfer it on to third parties.

We entrust in the confidentiality and data protection of MailChimp, which is certified under the US and EU Data Protection Agreement 'Privacy Shield' (<https://www.privacyshield.gov/participant?id=a2zt0000000000T06hAAG>) and is committed to complying with EU data protection regulations. Furthermore, Granollers Transport SL has signed a contract with MailChimp.

For more information on MailChimp's privacy and data protection policy please visit <https://mailchimp.com/legal/privacy/>.

## **12. Social networking plugins**

On our website we use social networking add-ons from the following third-party providers for advertising purposes only.

### Facebook

Our website integrates plug-ins from the social network Facebook (1601 South California Avenue, Palo Alto, CA 94304, USA).

Facebook plug-ins are identified by the Facebook logo on our website. An overview of Facebook plug-ins can be found here: <https://desarrolladores.facebook.com/docs/plugin-ins/>.

When you visit our website, the plug-in establishes a direct connection between your browser and the Facebook server. The data is transmitted and stored on Facebook, which receives information indicating that you have visited our website with your IP address. Granollers Transport SL does not have access or information about the content of the data transmitted, nor its use by Facebook.

For more information, see the Facebook Privacy Policy at <https://es-gb.facebook.com/policy.php>.

If you do not want Facebook to associate your visit to our site with your Facebook account, please sign out of your Facebook account before visiting our website. You can also prevent Facebook plug-ins from being loaded as plug-ins on your browser, for example, by using the 'Facebook blocker'.

### Facebook SDK

The Facebook Software Development Kit (SDK) is integrated into our application. Facebook SDK is provided by Facebook Inc. (1601 S. California Ave, Palo Alto, CA 94304, USA).

The Facebook SDK helps increase the success of Facebook-based advertising campaigns on mobile applications. For example, this means that no advertising from the corresponding application is displayed on the devices on which it is already installed. In addition, Facebook SDK allows for various assessments of the application's installation and the success of the advertising campaign. User activity on the application may be analysed in order to better define the target group for advertising campaigns.

In this regard, the Granollers Transport SL bicycle hire service application sends pseudonymised data to Facebook, such as the application ID and information indicating that the application has

been opened. The advertising ID provided by the operating system of the device serves as a pseudonym (name may vary according to operating system).

Granollers Transport SL does not know any information about the identity of the user.

### Twitter

Our website includes plug-ins from the short messaging service Twitter Inc. (795 Folsom St., Suite 600, San Francisco, CA 94107, USA). Twitter plug-ins can be identified by the Twitter logo (white bird on a blue background) and the word 'Twitter'. The Twitter plug-in is enabled with a single click, through which your browser establishes a direct connection with Twitter servers and your Twitter account. This can also lead to an exchange of data with other Twitter users. We do not receive any information about the data sent to Twitter.

We have no information about the purpose and scope of data collection and subsequent processing and use of the data by Twitter. If you need more information, please visit <https://twitter.com/privacy>. You can manage your privacy settings in the 'Settings' section of your Twitter account (<https://twitter.com/account/settings>).

### LinkedIn

Our website includes plug-ins from the network of LinkedIn Corporation (2029 Stierlin Court, Mountain View, CA 94043 USA). For privacy matters outside the United States, LinkedIn in Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible. Websites that include the plug-in will cause your browser to download the appropriate components from LinkedIn.

This will allow LinkedIn to know which specific subpage of our website you are visiting. If you are logged into LinkedIn at the same time, you may be assigned to your LinkedIn account. If you do not wish to be assigned to your LinkedIn account, you can avoid this by signing out of your LinkedIn account before visiting our website. By clicking on the LinkedIn plug-in, the website you are visiting will be linked to your LinkedIn account and made known to other users.

We do not receive any information about the data sent to LinkedIn. We have no information about the purpose and scope of data collection and the subsequent processing and use of the data by LinkedIn. Information on data protection can be found at <https://www.linkedin.com/legal/privacy-policy>. Moreover, you have the possibility to manage data protection settings in the 'Settings' section of your LinkedIn account.

### Xing

Xing network plug-ins (Xing AG, Dammtorstraße 30, 20354 Hamburg, Germany) are integrated into our website).

Websites where the Xing plug-in has been used establish a direct connection with Xing servers through your browser in the short term. To the best of our knowledge, Xing does not store any personal data about you when you visit this website. In particular, Xing does not store IP addresses, nor is your activity assessed through the use of cookies. Information on data protection at Xing can be found at <https://www.xing.com/app/share?op=dataprotection>.

We do not receive information about the data sent to Xing.

### Google Maps

Plug-ins from the Google Maps online service of Google Inc. (CA 94043, 1600 Amphitheatre Parkway, Mountain View, USA) are integrated into our website and applications. By using Google Maps on our website, Google transmits and stores information about your activity and IP address.

We have no information about the purpose and scope of data collection and the further processing and use of the data by Google. According to Google, this information is not linked to other Google services. The data collected by Google may be transferred to third parties. By using our website, you consent to the processing of data by Google.

Data processing on Google Maps can be blocked by disabling Javascript in your browser. However, this indicates that the Google Maps map view can no longer be displayed.

For more information on Google's privacy practices, visit [https://www.google.com/intl/de\\_en/help/terms\\_maps.html](https://www.google.com/intl/de_en/help/terms_maps.html).

### OpenStreetMaps

Plug-ins from the OpenStreetMap online service (FOSSGIS e.V., Romerweg 5, 79199 Kirchzarten) are integrated into our website and applications. By using Google Maps on our website, information about your activity and IP address is transmitted to OpenStreetMap and stored.

We do not know the purpose or scope of OpenStreetMap's data collection, processing and further use of the data. According to OpenStreetMap, this information is not linked to other services. The data collected by OpenStreetMap may be transferred to third parties. By using our website, you consent to the processing of data by OpenStreetMap.

Data processing by OpenStreetMap can be blocked by disabling Javascript in your browser. However, this means that the OpenStreetMap map view can no longer be displayed.

For more information about OpenStreetMap's privacy policy, visit <https://www.fossgis.de/datenschutzerklaerung>.

### Apple Maps

Plug-ins from the Apple Maps online service from Apple Inc. (One Apple Park Way, Cupertino, California, USA, 95014) are integrated into our website and applications. When you use Apple Maps on our website, Apple Maps transmits and stores information about your activity and IP address.

We do not know the purpose or scope of Apple Maps' data collection, processing, and subsequent use of the data. According to Apple Maps, this information is not linked to other services. Data collected by Apple Maps may be shared with third parties. By using our website, you consent to Apple Maps processing your information.

You can block data processing by disabling Javascript in your browser. However, this indicates that the Apple Maps map view can no longer be displayed.



For more information on Apple Maps' privacy practices, visit <https://www.apple.com/legal/privacy/en-ww/>.

### Instagram

On our website we use a plug-in from Instagram, a service from Instagram Inc. The 'Insta' button displayed on our website informs Instagram that you have visited the corresponding page of our website. If you are signed into Instagram, Instagram can associate this visit to our website with your Instagram account and link the data. By clicking on the 'Instagram' button, the transmitted data is saved by Instagram. For information about the purpose and scope of data collection, processing and use, and your rights and privacy options, see the Instagram Privacy Policy available at <https://help.instagram.com/155833707900388>.

To prevent Instagram from associating your visit to our website with your Instagram account, you must sign out of your Instagram account before visiting our website.

### Youtube

Our website integrates a plug-in from the YouTube video platform (YouTube, LLC 901 Cherry Ave, 94066 San Bruno, CA, USA, A Google Inc. Company, Amphitheatre Parkway, Mountain View, CA 94043, USA). Furthermore, we use some of the company's components (videos). In this regard, we use the 'Extended Data Protection Mode' option provided by YouTube.

When you access a page that has a built-in video, a connection is made with YouTube's servers and the content is displayed on the website by notifying your browser.

According to YouTube, when 'Privacy-Enhanced Mode' is enabled, data is only transmitted to the YouTube server, primarily including information on which of our websites you visited when you viewed the video. If you are signed into YouTube at the same time, this information will be associated with your YouTube account. You can prevent this from happening by signing out of your YouTube account before visiting our website.

Google provides more information about YouTube data protection at the following link <https://policies.google.com/privacy?hl=enl=de>.

### Using Google AdWords

We also use Google-Adwords, Google's advertising tool, to promote our website. In this regard, we use conversion tracking analytics from Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043 USA), hereinafter referred to as 'Google'. If you accessed our website by means of a Google advertisement, a cookie, known as a conversion cookie, will be stored on your computer, losing its validity after 30 days. Such cookies are not for personal identification purposes. If you visit certain pages on our website and the cookie has not yet expired, together with Google we will be able to acknowledge that you, as a user, have clicked on one of our ads placed on Google and have been redirected to our page.

Google uses the information collected with the help of conversion cookies to generate visitor statistics for our website. These statistics show us the total number of users who clicked on our ad and also which pages of our website were subsequently accessed by the respective user.

However, we, and others who advertise through Google-Adwords, do not receive any information through which users can be personally identified.

You can stop conversion cookies from being installed by configuring the settings in your browser, overriding automatic cookie settings or specifically blocking cookies from the googleadservices.com domain.

You can view Google's privacy policy by clicking on the following link: <https://services.google.com/fh/files/misc/sitestats/en.html>.

### Use of Google Analytics with anonymisation and Google Tag Manager

We use Google Analytics, a web analytics service from Google Inc. (1600 Amphitheatre Parkway, Mountain View, CA 94043 USA), hereinafter referred to as 'Google'. Google Analytics uses cookies, which are text files stored on your computer to help the website analyse how users make use of the website.

The information generated by these cookies, such as the time, place and frequency of your visit to the website, including your IP address, is transmitted to and stored by Google in the United States.

We use Google Analytics on our website with an IP anonymisation function. In this case, Google will reduce the accuracy of your IP address within the member states of the European Union or in other signatory states of the Agreement on the European Economic Area in order to make you anonymous.

Google will use this information to assess your use of our website, to compile reports for us on website activity and to provide other services related to website and Internet usage. Google may also transfer this information to third parties if required to do so by law or if third parties process this data on Google's behalf.

According to Google's own declarations, Google will never associate your IP address with other Google data. You can reject the use of cookies by selecting the appropriate settings in your browser. However, please note that if you do so, you will not be able to use the full functionality of our website.

Google also offers a disable option for the most popular browsers, giving you more control over the information Google collects and processes. If you enable this option, no information about your visit to the website will be transmitted to Google Analytics. However, it does not prevent information from being transmitted to us or to other web analytics services that we may use. For more information about the 'Opt-out' option provided by Google and how to enable this option, click on the following link: <https://tools.google.com/dlpage/gaoptout?hl=es>

We use Google Tag Manager on our website: Google Tag Manager is a solution that allows marketers to manage website tags through a single interface. The Tag Manager tool itself (which implements tags) is a domain without cookies that does not collect personally identifiable information. The tool enables other tags that can collect data. Google Tag Manager does not access this data. If deactivation has been made at the domain or cookie level, it will remain in effect for all tracking tags implemented with Google Tag Manager. For more information, click on the following link: <http://www.google.de/tagmanager/use-policy.html>.

## **13. Rights of the data subject**

In general, personal data processed by Granollers Transport, SL will be directly provided by the data subject. However, certain data may be directly provided by third parties.

Granollers Transport SL will contact the data subject to inform them about the processing of their personal data, in accordance with the provisions of Articles 13 and 14 of the General Data Protection Regulations. Likewise, the data subject will be informed of their right to oppose the processing of their data, as well as their other rights (Art. 15 to 22 of the GDPR).

#### Right of access

As the data subject, you have the right to be informed whether Granollers Transport SL is processing your personal data.

Granollers Transport SL must provide the data subject with the following information:

- a) The purposes for which the personal data is processed
- b) The categories of personal data that are processed
- c) The recipients or categories of recipients to whom the personal data has been or is still disclosed
- d) The envisaged period for which your personal data will be stored, or, if no specific information can be obtained, the criteria for determining the storage period
- e) The existence of a right to rectification or deletion of the personal data that concerns them, the right to restrict processing by the controller or the right to object to such processing
- f) The right to notify the supervisory authority if it is believed that Granollers Transport SL does not process data in accordance with regulations
- g) Any available information on the origin of the data if the personal data has not been obtained from the data subject
- h) The existence of automated decision making including profiling in accordance with paragraphs 1 and 4 of Article 22 of the GDPR and, at least in these cases, relevant information on the logic involved and the scope and expected effects of such processing for the data subject
- i) If the personal data that concerns them is transferred to a third country or to an international organisation. In this regard, you may request to be informed of the appropriate safeguards under Art. 46 of the GDPR in connection with transmission.

#### Right of rectification

You have the right to request the rectification of any data processed by the controller that is incorrect or incomplete. The data controller shall process the correction of your data immediately.

#### Right to restrict processing

Under the following conditions, you may request that the processing of your personal data be restricted:

- a) If you question the accuracy of the personal data that concerns you. The processing of your data will be restricted for a period of time allowing the controller to verify the accuracy of such personal data.
- b) If the processing is illegal and you refuse to delete personal data and instead request that the use of personal data be limited.

- c) If the data controller no longer needs the personal data for the purposes of processing but, however, you need it for the formulation, exercise or defence of claims.
- d) If you have objected to the processing of your personal data in accordance with Art. 21, par. 1 of the GDPR while verifying whether the legitimate grounds of the data controller prevail over those of the data subject.

In the event that the processing of personal data has been restricted for one of the reasons outlined above, such data may only be processed, with the exception of its storage, with the consent of the data subject or for the formulation, exercise or defence of claims, or with a view to protecting the rights of another natural or legal person or for reasons of substantial public interest of the Union or of a particular Member State.

If the processing of your data has been restricted in accordance with the above conditions, the controller will inform you before the restriction is lifted.

#### Right to be forgotten and right to erasure

In accordance with Art. 17 of the GDPR, you can request that the controller deletes your personal data immediately with the controller obliged to erase said data if one of the following reasons is given:

- a) The personal data is no longer required in relation to the purposes for which it was collected or otherwise processed.
- b) The data subject withdraws the consent on which the processing is based in accordance with Article 6 (1) (a) or Article 9 (2) (a), which is not based on any other legal basis.
- c) The data subject objects to the processing pursuant to Article 21 (1) and other legitimate grounds for the processing shall not prevail, or the data subject objects to the processing pursuant to Article 21 (2).
- d) The personal data has been processed unlawfully.
- e) The personal data must be deleted in order to comply with a legal obligation set forth in the law of the Union or of the Member States that applies to the controller.
- f) The personal data has been obtained in connection with the provision of an information society service referred to in Article 8 (1).

#### Information to third parties

The controller shall communicate any rectification or erasure of personal data or restriction of processing pursuant to Article 16, Article 17 (1) and Article 18 to each of the recipients to whom the personal data has been disclosed, unless this is impossible or requires a disproportionate effort. The controller shall inform the data subject of those recipients, if requested by said person.

#### Exceptions

The erasure of personal data may not be carried out when processing is required to:

- a) Exercise the right to freedom of expression and information.
- b) Comply with a legal obligation requiring the processing of data imposed by the law of the Union or of the Member States that applies to the controller, or to perform a task carried out in the public interest or when exercising the public duties conferred to the controller.
- c) For reasons of public interest, in terms of public health, in accordance with Article 9 (2) (h) and (i) and (3); (4) for archiving purposes in the public interest, for scientific or historical

research purposes or for statistical purposes, in accordance with Article 89 (1), in so far as the right referred to in paragraph (1) would make it impossible or seriously impede the achievement of the purposes of such processing.

- d) For the formulation, exercise or defence of claims.

#### The right for the data controller to inform third parties

If you have exercised your right to have the controller correct, erase or restrict use of your personal data, the controller is obliged to inform all recipients to whom your personal data has been disclosed about the correction or erasure of data or restrictions to data processing, unless this proves impossible or involves a disproportionate effort.

#### The right to data portability

You have the right to receive the personal data that you have provided the data controller with in a structured, commonly used and machine-readable format, and to transmit it to another data controller without being impeded by the data controller to whom you provided it with, when:

- a) The processing is based on consent pursuant to Article 6 (1) (a) or Article 9 (2) (a) or on a contract pursuant to Article 6 (1) (b).
- b) The processing is carried out by automated means.

By exercising the right to data portability, the data subject shall have the right to have personal data transferred directly from one data controller to another where technically possible. The freedoms and rights of others must not be affected by this.

The right of portability shall not apply to processing that is necessary to perform a task carried out in the public interest or when exercising the public duties conferred to the controller.

#### Right of opposition

The data subject shall have the right to object at any time, on grounds relating to their particular situation, to their personal data being processed on the basis of Article 6 (1) (e) or (f), including profiling on the basis of those provisions. The controller shall cease to process personal data, unless it establishes compelling legitimate grounds for said processing, which prevail over the interests, rights and freedoms of the data subject, or for the formulation, exercise or defence of claims.

In the event that the processing of personal data is for the purpose of direct marketing, the data subject shall at all times have the right to object to the processing of personal data that concerns them, including profiling inasmuch as it relates to said marketing. Should the data subject object to processing for direct marketing purposes, personal data shall no longer be processed for such purposes.

You have the option to exercise your right to object to the processing of your personal data in connection with the use of information society services by means of automated procedures using technical specifications, without prejudice to Directive 2002/58/EC.

In cases in which personal data is processed for the purposes of scientific or historical research or for statistical purposes in accordance with Article 89 (1), the data subject shall have the right, on

grounds relating to their particular situation, to object to the processing of personal data that concerns them, unless this is necessary for performing a task carried out in the public interest.

#### Automated individual decision making, including profiles

You have the right not to be the subject of a decision based solely on automated processing, including profiling, which significantly affects you.

This will not apply if the decision:

- a) Is necessary in order to enter into or fulfil a contract between the data subject and a controller.
- b) Is authorised by the law of the Union or of the Member States that applies to the controller and that also provides for appropriate measures to safeguard the rights and freedoms and the legitimate interests of the data subject.
- c) Is based on the explicit consent of the data subject.

The controller shall take appropriate measures to safeguard the rights and freedoms and the legitimate interests of the data subject, including, at the very least, the right to obtain human intervention on behalf of the controller, the right to express their point of view, and the right to challenge the decision.

These decisions may not be based on the special categories of personal data referred to in Article 9 (1), except where Article 9 (2) (a) or (g) applies, and appropriate measures have been taken to safeguard the rights and freedoms and the legitimate interests of the data subject.

#### The right to appeal to the supervisory authority

Without prejudice to any other administrative or judicial appeals, the data subject has the right to notify the supervisory authority, in particular in the Member State where they reside, work or suspect the infringement to have occurred, if they believe that the processing of their personal data does not comply with the GDPR.

The supervisory authority to which the complaint has been lodged shall inform the claimant of the status and outcome of the complaint, including the possibility of a judicial appeal under Article 78 of the GDPR.

## **14. Changes to the privacy policy**

We reserve the right to modify, at any time, this privacy and data protection policy to adapt to legal changes or modifications related to the provision of the service by Granollers Transport SL.