

**PRIVACY NOTICE  
PROCESSING OF CLIENT'S PERSONAL DATA**

**1. CONTACT DETAILS OF THE DATA CONTROLLER**

<b>DATA CONTROLLER (the "Company" or the "Controller")</b>	<b>W Executive Espana Paseo de la Castellana, 85 28046 Madrid VAT: 10919980656 email: info@wexecutive.es</b>
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**2. CATEGORIES OF PERSONAL DATA WE USE**

We process your identification data, such as first name, surname, company you work for, phone contacts and e-mail address, job title, role.

If you are not part of an organisation and you are a professional, we also use your financial information, such as TAX code, VAT.

We may collect the data directly from you through phone calls, e-mails, fax, in person meetings, collection forms you fill in on our website, or from other sources, such as your company's website, your company's personnel, third parties, professional social networks.

**3. WHY WE USE YOUR DATA AND DATA RETENTION PERIOD**

<b>WHY DO WE USE YOUR DATA?</b>	<b>WHAT ARE THE LEGAL BASES OR THE LEGAL CONDITIONS FOR THE PROCESSING?</b>	<b>HOW LONG DO WE HOLD YOUR PERSONAL DATA?</b>
To establish and manage a commercial relationship with you or your organisation	The processing is necessary for the performance of the contract or in order to take steps prior to entering into the contract	For the duration of the contract and for the following 5 years
To fulfil our obligations under the applicable tax and civil laws (for clients who are natural persons)	Compliance with a legal obligation to which the Controller is subject.	For 4 years as of the end of the concerned business year

<p>To contact you and find out if you are interested in our services:</p> <ul style="list-style-type: none"> <li>• sending direct marketing communications concerning our services, initiatives and events promoted by the Company, through phone, email, text messages, picture messages, direct messages via social media</li> </ul>	<p>Your consent</p>	<p>For 24 months unless you withdraw your consent before.</p>
<p>For existing clients: To send marketing communications about services similar to what have been already purchased</p>	<p>Our legitimate interest to promote our services towards previous clients.</p>	<p>We will hold your data for 24 months starting from your purchase. You can object to the processing of your data for this purpose at the moment of the collection and then at any time, by choosing the “unsubscribe” option within the communication you receive</p>
<p>To establish, exercise or defend legal claims</p>	<p>Legitimate interest of the Company to protect and defend its rights</p>	<p>For the time necessary for the establishment, exercise, or defence of legal claims.</p>
<p>After the above-mentioned retention periods have expired, all data stored in our database will be deleted or anonymised.</p>		

#### 4.YOUR OBLIGATIONS TO PROVIDE THE DATA

The provision of data related to the management of the contractual relationship and to the compliance with legal obligations is mandatory. If you do not provide us with the data we ask for, we cannot be able to provide you with our services.

Consent for marketing purposes is optional. If you do not consent to receive our promotional communication you will not be informed about our services, events and other initiatives.

You can always object to the processing of your data for direct marketing.

## 5. CATEGORIES OF DATA RECIPIENTS

The Company is part of a Group of companies. We may share or give access to your personal data to other Group's companies for administrative and organisational purposes, based on our legitimate interest in managing the group's clients within the group's companies.

We can communicate the data to our service providers or other group companies which carry out some services on our behalf (such as software and hardware providers, website providers, and other IT services providers, accountants) as data processors in accordance with a data processing agreement.

We can communicate the data to other public or private bodies whenever we are obliged to do so, in response to orders or requests from a court, regulators, government agencies or public authorities, or to comply with other law or regulatory requirements.

## 6. TRANSFER OF DATA

We are based in Spain, and we rely on an IT infrastructure located in the European Union. However, some of our suppliers (*IT services*) when provide some services can operate outside of the European Economic Area ("EEA"), such as in the US, and have access to the data from outside the EEA.

In these cases, data is transferred only in the presence of the safeguards indicated in the applicable data protection legislation. In particular, the transfer will take place:

-to destination countries for which the European Commission has issued an adequacy decision (art. 45 GDPR); or

- on the basis of the Standard contractual clauses ("SCCs") adopted by the EU Commission (art. 46 GDPR) provided that supplementary security measures are also in place.

For further information about the data transfers, you can contact our DPO and Data protection advisor at [privacy@wexecutive.es](mailto:privacy@wexecutive.es).

## 7. RIGHTS OF DATA SUBJECTS

You have certain rights in connection with the data processing.

You have the right to access your data and to modify or correct your data.

You can obtain the erasure of personal data and the restriction of the processing when certain conditions are met.

You have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format or ask Us to transmit that data to another controller, where technically feasible, if the processing is based on consent or on a contract and is carried out by automated means.

You have the right to withdraw the consent you have given at any time, without affecting the lawfulness of the processing carried out before the withdrawal.

You can always **object** to the processing of your data for direct marketing purposes, and, on grounds relating to your particular situation, you can also **object** to the processing of your personal data based on the legitimate interest of the controller.

If you wish to exercise one of these rights, you can contact our DPO at [privacy@wexecutive.es](mailto:privacy@wexecutive.es)

You can lodge a complaint with the data protection authority of your country if you believe that your rights have been breached. For Spain you can contact the Agencia Española de Protección de Datos ("AEPD") <https://www.aepd.es>.

