

Privacy Policy

1. Introduction

Although the visit to this website does not imply that the USER is obliged to provide information about himself or herself, only in the case that he or she provides information of a personal nature, will the data collected on this website be used for the purpose, in the manner and with the limitations and rights contained in the regulations in force for the protection of personal data.

For these purposes, and in compliance with the provisions of Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and the free movement of such data, we provide you with the following information on the processing of personal data that Axesor may carry out.

2. Identification of the data controller.

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| • Identity: AXESOR RISK MANAGEMENT S.L.U. |
| • Address: C/ Graham Bell. Edificio Axesor s/n de Armilla (Granada) |
| • Telephone: 911 553 000 |
| • E-mail: clientservice@axesor-rating.es |
| • Data Protection Officer: dpd@axesor.es |

3. Purposes of the processing of personal data.

Purpose/ Use.	Types of data	Legal basis for processing, including basis of legitimate interest
<p>To attend to and respond to your requests by any means informed, suggestions and subscriptions, and when appropriate, for the maintenance of the stable contractual relationship between the parties, the administration, the provision of the contracted service in each case, or the administration of the purchased product, the expansion and improvement of the services provided and the adequacy of them to your preferences and / or tastes.</p>	<p>(a) Identity. (b) Contact. (c) Technical. (d) Use. (e) Opinion.</p>	<p>(a) Consent. (b) Conclusion of a contract with the USER.</p>
<p>To send with your consent technical, operative or commercial information about the different products and services of Axesor in the present and in the future, directly through Axesor or through third parties.</p>	<p>(a) Identity. (b) Contact. (c) Technical. (d) Use. (e) Opinion.</p>	<p>(a) Consent when you are a visitor to the Website without being a registered USER before we send you commercial communications. (b) Based on our legitimate interests (to develop our products/services and grow our business). (c) Entering into a contract with you.</p>
<p>To record in full, through any technique suitable for such purpose, telephone communications and / or telematics produced or arising from the use of any Axesor service, to be able to certify the completion of any transaction and / or product to the request or products and / or services.</p>	<p>(a) Identity. (b) Contact. (c) Technical (USER IP address and access code).</p>	<p>(a) Necessary for our legitimate interests (to keep our records up to date so that they can be used as a means of evidence for any judicial or arbitral proceedings that may arise directly or indirectly between both parties, to study how USERS use our products / services, to certify the completion of any transaction related to the request and contracting of products and</p>

		<p>services, to evaluate the quality and efficiency of the service provided, to respond to complaints and / or incidents that may arise, to identify operations and accesses made to our website and monitor the consumption of information products made by the USER, to notify you of changes to our terms or privacy policy).</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>To use data analysis to improve our website, products/services, marketing, USER relations and experiences.</p>	<p>(a) Technical. (b) Use.</p>	<p>Necessary for our legitimate interests (define types of USERS for our products and services, keep our website updated and relevant, develop our business and inform our marketing strategy).</p>
<p>To send you information and advertising of products and services offered by companies linked to the sectors of information, catering, telecommunications, finance, insurance, energy, leisure, training, food, automotive, NGOs, textiles, consumer goods, water sectors, making suggestions and recommendations on goods or services that may be of interest to you.</p>	<p>(a) Identity. (b) Contact. (c) Technical. (d) Use.</p>	<p>(a) Consent. (b) Necessary for our legitimate interests (to develop our products/services and grow our business).</p>

4. Consents

The consents and authorizations necessary for each purpose of the processing shall be collected in the different forms of data collection which can be found on the website.

You may revoke your consent at any time, for those purposes that are not necessary for contracting and providing services, by sending an email to the address: clientservice@axesor-rating.es You may also revoke your consent by contacting us through the telephones 902 54 40 44/958 01 55 21, in each commercial or advertising communication sent to you and by notifying this us through the channels indicated on the website <https://rating.axesor.es/en/contact-us>

In the event that the contract was signed by a legal entity, the consent granted by the authorized representatives shall be deemed given both in their own name and that of the legal

entity they represent, with it being possible to oppose, at any time, the sending of such communications through the usual channels of communication with AXESOR.

The answer to the questions that have been raised and the data requested to formalize their relationship with AXESOR is entirely optional, AXESOR has no obligation to request consent from the USER for the collection of data regarding the parties of the contract or pre-contract of the business relationship and being necessary for the maintenance and fulfillment thereof. In this way, the refusal of the USER to provide personal data that may have been requested, shall determine the lack of validity of this contract as necessary for the aforementioned purpose.

Nor will it be necessary to obtain consent when there is a legitimate interest by the parties to respond to requests for information, suggestions, answering requests or to contact the USER who requested it.

5. Retention period

Your personal data shall be kept during the period of validity of the commercial relationship, as long as the interest for which you are reading this policy persists if you do not request the deletion of your data; during the prescription period of the actions that may arise in relation to this contract; as well as during the time derived from any claim that we could receive from official organisms in compliance with legislative norms.

The personal data provided for the sending of commercial communications shall continue to be maintained until you revoke the consent, all without prejudice to your right of withdrawal or opposition to the tampering of your personal data.

6. Legitimation of data processing

In accordance with article 6.1 b) of the GDPR, the processing of the data that you have provided us, for the purposes informed in this privacy policy, is lawful as it is necessary for the execution of the commercial or pre-commercial relationship of which you are part, so that we can manage, develop and control the corresponding commercial and contractual relationship or the consultations made.

All the information that we request from you is obligatory, reason why the non-compliance of some may make the provision of the services that we offer through our website impossible.

With respect to the sending of commercial communications by electronic means - following a prior contractual relationship - the legal basis is the legitimate interest of AXESOR under article 21.2 of the Law of Information Society Services and Electronic Commerce.

With respect to the sending of commercial communications on other products/services by other means, as well as for commercial mail from third-party assignees, the legal basis is the consent that is requested in each form of data collection which you will have given your consent to, specifically and freely.

In the event of not obtaining your consent, AXESOR undertakes not to process your data for advertising or assignment purposes it to third parties for the same purposes, knowing that you will not receive information of any kind that may be of interest to you.

7. Communication, transfer of data and international transfer of data

Axesor may communicate your personal data to those public administrations with competence in the matter and in the event that there is a legal obligation to do so.

However, if at any time throughout the commercial relationship it is necessary to communicate your data to third parties for new purposes, such communication shall be made when AXESOR has your prior consent to do so and in the legally required manner.

Your identification data and contact information shall be transferred, with prior consent, to other companies linked to the sectors of information, catering, telecommunications, financial, insurance, energy, leisure, training, food, automotive, NGO, textile, consumer goods, water, and other collaborating companies, at present or in the future. Furthermore, segmented behavioural advertising cookies (without any personal data) shall be assigned to said companies so that said third parties may send you personalized advertising.

Depending on the service contracted from our website, your data may be communicated to third parties as data processor when it is necessary to provide the service, with the sole purpose of carrying out the processing and management of the contracted operation.

We shall not carry out any international transfer of your personal data.

8. Rights of the interested party

In certain circumstances, you may exercise your rights in relation to your personal data under data protection laws.

In particular you have the right to:

Request access to your data, as anyone has the right to obtain confirmation of whether we are processing his/her personal data, and if so, the right of access to his/her personal data, the purposes of the processing, and the categories of personal data processed.

Request correction of data, i.e. request rectification of inaccurate data.

Request the deletion of the data, when they are no longer necessary for the purposes for which they were collected; either because the consent on which the processing is based has been withdrawn or has not been given; or because the personal data have been processed without complying with legal obligations; or they must be deleted for compliance with a legal obligation laid down in the Law of the European Union or of the Member States.

Please note, however, that we may not always be able to comply with your deletion request for specific legal reasons of which you will be notified, if applicable, at the time you respond to the exercise of your right.

Oppose the processing of your data: in certain circumstances and on grounds relating to your particular situation, you may object to the processing of your data.

In this case, Axesor will stop processing the data, except for its own legitimate reasons or for the legitimate interest of its clients (third parties) or the exercise or defence of possible claims.

Request the limitation of the processing of your personal data. You can request a limitation when

- You draw attention to an inaccuracy of the personal data, during the period that allows Axesor to verify the accuracy of the same;
- Consider that the processing is illegal and you do not want to delete your personal data and instead request the limitation of its use;
- Axesor no longer needs the personal data for the purposes of processing, but either party needs them to formulate the defence of a claim.
- In cases where the data subject has objected to the processing, during the time it takes Axesor to verify whether the legitimate reasons for the processing of the data prevail over those of the data subject;

In such cases, we will only retain data for the exercise or defence of claims.

Request to receive your personal data (portability) that you have provided in a structured format and transfer them to another data controller that you indicate to us.

Withdraw consent at any time when, in order to process your personal data, it has been necessary to obtain your express and affirmative consent. The exercise of this right, however, will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will let you know if this is the case when we withdraw your consent.

How to exercise your rights against AXESOR:

You should send a written communication to Axesor at the Parque Empresarial San Isidro. c/Graham Bell, s/n Edificio Axesor, 18100 Armilla (Granada).

If you are not a USER of our website, but your contact details from sources accessible to the public can be used by Axesor within its commercial information products, you can also obtain all information about the processing carried out and about your rights in this regard, by contacting the Data Protection Delegate at the email address dpd@axesor.com

In addition, and in order to further guarantee your rights, you have the option to modify at any time all your consent or to oppose the sending of commercial communications of our services by contacting the Data Protection Officer at dpd@axesor.com

You will not have to pay a fee to exercise any of the rights indicated in this section, unless this possibility is legally contemplated, and the response and actions necessary to attend to it would entail a cost for AXESOR. AXESOR may charge you a reasonable fee or alternatively

we may refuse to respond and comply with your request if it is clearly unfounded, repetitive or excessive.

Necessary information to be able to attend the exercise of the rights:

It must include your name, surname, a photocopy of your ID document, an address for notification purposes and expressly indicate the right you wish to exercise. Alternatively, you can email us at clientservice@axesor-rating.es or contact the Data Protection Officer at dpd@axesor.com

Time limit for response:

We try to respond to all legitimate requests within one month. Occasionally, it may take us more than a month if your application is particularly complex or if you have made a series of applications. In this case, we will notify you and keep you updated.

Submission of a complaint to the Supervisory Authority:

Finally, under the terms established in the data protection legislation in force, you have the right to file a complaint, claim or denunciation at any time with the Spanish Supervisory Authority by following this link <https://www.aepd.es>.

However, we would appreciate the opportunity to address your concerns before approaching the Control Authority, and so we remain at your disposal for you to contact us in the first instance.

9. Provenance

Personal data on registered ADVERTISERS and USERS of our website that we process at AXESOR come from the interested party in all cases.

If the personal contact data of third parties are provided by the USER, you must guarantee that the information reported is of persons over the age of 14 and that the information is accurate and truthful, and undertake to communicate the present clause to the holders of said data, informing them, prior to the sending the data, of all the aspects included therein, in particular the existence of processing, the purposes, assignments and the possibility of exercising rights. In the event of it not being communicated, the USER undertakes to indemnify AXESOR for any damage, loss, expense or sanction of any jurisdictional order that the lack of communication of this clause may cause the owners of the data provided by the USER.

10. Additional information

The USERS guarantee and respond, in any case, to the veracity, accuracy, validity, authenticity of the Personal Data provided, and undertake to keep it updated.

Furthermore, USERS guarantee to be over 14 years old.

By providing the requested information, you declare that it is true, accurate and complete. You must inform AXESOR of any change in personal data for the correct management and quality of the service and of the data processed, especially contact data, such as address, direct debit, email, telephone, etc.

AXESOR has adopted the legally required security levels of protection of personal data and has installed all the technical means and measures available according to the state of technology to avoid loss, misuse, alteration, unauthorized access and theft of personal data provided.

The USER can rely on the duty of secrecy and confidentiality of the employees of AXESOR and all those who process the data in name and on behalf of the same. Notwithstanding the foregoing, the USER is aware of the possibility that the security of online communications is not invulnerable.

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