#### PRIVACY POLICY

You can read more about our privacy policy below. In this policy, we would like to inform you about the way in which we handle the personal data of our customers. When processing personal data, we comply with the law, currently the European Regulation No. 2016/679 of 27 April 2016 on data protection, better known as GDPR. Do you have any questions? Contact us at anke@cornez.es

#### WHAT DATA DO WE COLLECT?

Cornez does not process any special or sensitive data. Below we provide an overview of the personal data that we may process.

- 1. Identity data of the client (seller or lessor): surname, first name, address, date of birth, place of birth, telephone number, e-mail address, national register number
- 2. Identity data of the prospective buyer or prospective tenant: surname, first name, address, date of birth, place of birth, telephone number, e-mail address, national registration number, search wishes
- 3. Identity data of the tenant: surname, first name, address, date of birth, place of birth, telephone number, e-mail address, national register number, income, employment, civil status, family composition
- 4. Details of the property of the client (seller/landlord): title to the property, urban planning extract, soil certificate, inspection certificate of the electrical installation, EPC certificate, floor plans, information on the susceptibility to flooding, post-intervention file, information on the heritage value, etc.
- 5. Technical information: IP address, the number of web pages visited during a visit to our site, the type of browser used to surf the site, the date and duration of the session, cookie data, device information.

### WHY DO WE COLLECT THE DATA?

## Legal obligations

In specific circumstances, we are required to process personal data. These include, inter alia, the obligation to contribute to the prevention of money laundering and the obligation to respond to a formal request from the Spanish tax and judicial authorities. These legal obligations for which we have to process data are not exhaustive and are subject to change.

# **Contractual relationships**

Before concluding contracts, Cornez must obtain and process certain data, in particular in order to, among other things:

- 1. respond to your request;
- 2. assist you in providing information and in concluding a contract
- 3. follow up on a request, evaluate suitability and assess the risks related to a potential contract;
- 4. fulfil your mediation mission.

In the context of current contracts or the management of contracts, we need to process a number of data, in particular to comply with administrative and accounting obligations. In this context, your data may be sent internally within Cornez to various departments. More specifically, Cornez processes your data in the performance of contracts as follows:

- 1. Management of current contracts/ordered services
- 2. Central management and overall view of the customers
- 3. the management of your property

Cornez may process personal data for additional purposes in the context of the relationship with the data subject and the performance of contracts.

## Legitimate interests

Cornez processes personal data for the realisation of legitimate interests. In doing so, we strive to strike a fair balance between the need to process the data and respect for the rights and freedoms of the data subjects, including the protection of privacy. In this context, personal data is processed for, among other things:

- 1. Personalizing our services
- 2. improving the quality of the service provided to you
- 3. monitoring our activities, including the size of the turnover, the number of appointments, the number of calls and visits to the website, etc.
- 4. the use of cookies to improve the ease of use for visitors (more information about our cookies policy can be found below)
- 5. preservation of evidence (archives)establishing, exercising, defending and preserving our rights or any person we represent, for example for recovery proceedings or disputes.

### **Your Consent**

We may process your personal electronic contact details (telephone number and e-mail address) in order to send you information, advertisements or proposals via direct marketing, newsletters, by post or e-mail. In this case, we will first ask for your specific consent.

#### TO WHOM DO WE TRANSFER THE DATA?

We treat all personal data with the utmost care and only share the data in order to offer you the best services in the execution of our assignment. In some cases, we are required by law to share your information with third parties, including government agencies or supervisory authorities, where there is a legal obligation to disclose information.

We also transfer personal data to specific service providers to help with:

- 1. designing and maintaining computer equipment and internet applications
- 2. the provision of advertising and communication services, including online and social network providers
- 3. preparing reports and statistics, printing documents, and designing products or services
- 4. the commercialisation of our activities, the organisation of events and the management of customer communications

We ensure that third parties only have limited access to the personal data necessary to perform the specific tasks required. We will therefore ensure that third parties undertake to use the personal data in a secure and confidential manner.

We store all personal data within the EEA. Therefore, no data will be transferred to countries outside the EEA.

#### **HOW DO WE STORE THE DATA?**

We do not store the data longer than is necessary to achieve the purposes for which the data is collected. This period is linked to Cornez's legal and tax obligations, as well as the legal need to keep the data outside the retention period for evidence or to respond to requests for information from the competent authority, for example:

- 1. 10 years under anti-money laundering legislation
- 2. 10 years in the context of Cornez's contractual liability

Outside of this period, your personal data will be deleted or anonymized.

### **HOW DO WE PROTECT YOUR DATA?**

We apply strict standards to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. We therefore take measures of a technical and organisational nature, such as encryption, antivirus, firewalls, access controls, strict selection of employees and suppliers, to prevent and detect inappropriate access, loss or disclosure of personal data.

In the unlikely and unfortunate event that your personal data is compromised by an information security breach, we will act promptly to identify the cause of the breach and take action through appropriate measures. If necessary, Cornez will notify you of this incident in accordance with applicable law.

#### WHAT RIGHTS DO YOU HAVE?

You have the right to request, change or delete your data. You can send an e-mail to anke@cornez.es

Right to information - You have the right to be informed at the start of the processing. We hope that with this disclaimer we have been able to inform you well about our privacy policy. If you have any further questions, we will be happy to help you via anke@cornez.es.

Right to object - You have the right to object at the start of the processing, during the duration of the processing and at the end of the processing. Cornez may continue the processing of the personal data if there are compelling legitimate grounds for the processing that outweigh the interests, rights or freedoms of the data subject.

Right of access - During the duration of the processing, you have the right to access. In other words, you have the right to know whether or not personal data about you is being processed, for what purposes we process it, what categories of data are being processed and to whom the data is being disclosed. If you wish to inspect your customer profile, we will provide you with a copy of the processed personal data.

Right to rectification - During the duration of the processing, you have the right to rectification. We ensure that the personal data is stored correctly, but if you notice that your data is incorrect or incomplete, you can do so via anke@cornez.es. In that case, we will make every effort to adjust the data.

Right to data portability - During the duration of the processing and upon termination of the processing, you have the right to data portability. The transferability to another controller only applies to the personal data that you have provided yourself and therefore not to data that the brokers themselves have searched for or requested.

Right to restriction - During the duration of the processing and upon the termination of the processing, you have the right to restriction of the processing activity. This means that you have the right to (temporarily) stop (part of) the processing of your personal data if you contest the accuracy of the data. During that period, Cornez can check the data.

Right to erasure - Upon termination of processing, you have the right to erasure/erasure. When your contract has ended, you can ask for your personal data to be erased if this is no longer necessary for the purposes for which this personal data was collected. You also have the option to request the erasure of personal data processed by Cornez at any time on the basis of your consent (unless Cornez has another legal basis for the processing) or on the basis of Cornez's legitimate interest (unless there are overriding legitimate grounds for the processing). In any case, Cornez may retain these personal data if this is required for evidentiary purposes in the context of legal claims.

Right to lodge a complaint - You always have the right to lodge a complaint with the Data Protection Authority if you believe that the GDPR is not being complied with.