

PRIVACY POLICY.

PRIVACY POLICY AND DATA PROTECTION.

I. INTRODUCTION.

Parque Inmobiliario de Inversiones, S.L., (hereinafter, The Mercantile) reserves the right to modify this Policy in order to adapt it to new legislation, jurisprudential criteria, industry practices, or interests of the entity. Any modification in the same will be announced in due time, so that you have perfect knowledge of its content.

In order to provide certain services, it is necessary to manage your personal data. For these purposes, they will be incorporated into the corresponding treatment activities of The Mercantile **El Parque Inmobiliario de Inversiones, S.L** and will be treated with the specific purpose of each treatment, in accordance, mainly, with the regulation established by the GDPR, Regulation (UE) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and by which the Directive 95/46/CE (General Data Protection Regulation) and Spanish Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (LOPDGDD).

II. GENERAL INFORMATION.

Below, The Mercantile informs, in a general way, about the safeguarding of privacy and the protection of personal data applied to the treatment activities carried out at the Portal level, as well as by other means:

1.- Who is responsible for the processing of your personal data?

The Mercantile **El Parque Inmobiliario de Inversiones, S.L.**, CIF: **B28360543**, has the status of Data Controller, with registered office for these purposes in **Avenida de Brasilia, 9-Entreplanta CP 28028 Madrid**.

- **Registered in the following Mercantile Register / Public Registry:** Volume 5127, folio 21, sheet number M-83974
- **Address:** Avenida de Brasilia, 9-Entreplanta CP 28028 Madrid.
- **Telephone:** 608 111 624
- **E-mail:** info.atocha@apartamentoselparque.es
- **Our web:** www.apartamentoselparque.es

2.- Why do we process your personal data?

The purpose of the collection and processing of personal data, through the different forms owned by The Mercantile, made available to Users, respond, depending on the specific case, to manage and respond to requests for information, doubts, complaints, congratulations or suggestions to the publications or to any services or activities, acts

or events provided, offered, sponsored and/or sponsored by The Mercantile. Specifically, at The Mercantile we process the data for the following purposes:

- Information and, where appropriate, processing of the application for registration and management of your condition as an Associate of The Mercantile / Client of The Mercantile.
- Economic, accounting, administrative and billing management in any of its conditions (Associate of The Mercantile / Client of The Mercantile; publication orders; registration).
- Management of subscription requests to receive communications and electronic newsletters about The Mercantile.
- Attention, response and management of information or contact requests made to The Mercantile.
- Sending information about The Mercantile's own services, seminars and events that are organized, including information about The Mercantile's services.
- Conducting market research to measure the quality of The Mercantile's services, through satisfaction surveys.
- In the case of purchases through The Mercantile's website, the data collected on it will be used to manage the contractual relationship with The Mercantile, as well as for economic, accounting, administrative, and billing management derived from the purchase same.
- Inclusion, where appropriate, in the restricted access area of the website.

3.- What is the legal basis that legitimizes the processing of your personal data? In other words, what grounds or enables us to process your personal data?

The legal basis that legitimizes us for the treatment of your personal data are the following; (I) the consent granted by you by signing or accepting the pertinent forms, for one or several specific purposes (II) and, if applicable, the execution of a contract to which you are a party, as a contractor or client.

4.- How long do we keep your personal data?

We will keep your personal data for the corresponding period to maintain a history of attention and manage our services efficiently and the interested party does not request its deletion. Even if the deletion is requested, they will remain blocked for the time necessary, and limiting their treatment, only for one of these cases: comply with the legal/contractual obligations of any kind to which we are subject and/or during the legal periods established for the prescription of any responsibilities on our part and/or the exercise or defense of claims derived from the relationship maintained with the owner of the data.

5.- Who should keep the data up to date?

On the other hand, in order that the data in our files, computerized and/or on paper, always correspond to reality, we will try to keep them updated. So, for these purposes, the User must make the changes, directly, when so enabled or by communicating, by reliable means, to the corresponding area or department of The Mercantile.

6.- Who can be assignees or recipients of your personal data?

Personal data will not be transferred or communicated to third parties, except in the cases necessary for the development, control and fulfillment of the expressed purpose(s), in the cases provided by Law.

7.- Seguridad de los datos personales.

The Mercantile will adopt the appropriate technical and organizational measures in its information system, complying with the principle of proactive responsibility, in order to guarantee the security and confidentiality of the stored data, thus avoiding its alteration, loss, treatment or unauthorized access; taking into account the state of the art, the costs of application, and the nature, scope, context and purposes of the treatment, as well as risks of variable probability and severity associated with each of the treatments.

8.- What are your data protection rights and how can you exercise them?

You may exercise your rights of access, rectification, deletion, limitation, portability or, where appropriate, opposition, for these purposes, you must submit a letter to The Mercantile, by email addressed to the following address info.atocha@apartamentoselparque.es or the postal address indicated above.

In the letter you must specify which of these rights you request to be satisfied and, in turn, you must show or, in the case of postal delivery, accompany the photocopy of the DNI or equivalent identification document. In the event that you act through a representative, legal or voluntary, you must also provide a document that proves the representation and identification document of the same. Likewise, if you consider your right to the protection of personal data violated, you may file a claim with the Spanish Data Protection Agency (www.aepd.es).

Below more information about the exercise of your data protection rights is provided:

- **What are my rights?**
- **Who can exercise these rights before The Mercantile?**
- **How and where can I exercise these rights**

III. SUPPLEMENTARY INFORMATION RIGHTS.

a) What are my rights?

The data protection regulations allow you to exercise your rights of access, rectification, opposition, portability, deletion ("right to be forgotten"), treatment limitation and not to be subject to individualized decisions before the data controller, The Mercantile, in accordance with Regulation (EU) 2016/679, of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and the free movement of these data and which repeals Directive 95/46/EC (General Data Protection Regulation, hereinafter "RGPD") and Spanish Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of rights digital (LOPDGDD):

Right of access.

You have the right to know:

- Whether or not we are treating personal data that concerns you.
- The origin of your data, if you did not provide it to us.
- The purposes of processing your data.
- The categories of data in question.
- The recipients or categories of recipients to whom the personal data has been or will be disclosed.
- If possible, the anticipated retention period of the personal data (or, if not possible, the criteria used to determine this period).
- The right to file a claim with a supervisory authority.
- If we make automated decisions - including profiling - using your personal data.

Right of rectification.

You have the right to have your personal data rectified:

- Completing them, if they were incomplete.
- Updating or rectifying them, if for any reason they are no longer in accordance with the current reality or are inaccurate.
- By exercising the right of rectification, we will ensure that all your personal data is accurate and complete.

Right of deletion.

You have the right to have your personal data deleted when any of the following conditions apply:

- These data are no longer necessary for the purposes for which they were collected or processed.
- You withdraw the consent on which we base the processing of your data and it cannot be covered by another basis of legitimacy.
- You have successfully exercised the right to object to the processing of your data.
- The personal data has been unlawfully processed.

Right to limitation of treatment.

You will have the right to obtain the limitation of the processing of your personal data (that is, that we keep them without using them for the intended purposes).

Right of opposition.

You have the right to ask us to stop using your personal data, for example where you think the personal data we hold about you may be incorrect or you think we no longer need to use it.

Right of portability.

When the processing of your data is based on consent or is necessary for the execution of a contract or pre-contract and is carried out by automated means, you will have the right to the portability of your data, that is, to be delivered in a structured format. , of

common use and mechanical reading, even to send them to a new person in charge, that is why The Mercantile will facilitate the portability of your data to the new person in charge.

b) Who can exercise these rights before The Mercantile?

You, as the interested party or owner of the personal data, acting in your own name and right.

Through another person who acts, duly accredited, as a legal representative (eg when the holders of parental authority or guardianship act on behalf of a person under 14 years of age or when acting as the legal representative of a person with functional diversity) or volunteer (person that you have freely and voluntarily granted powers of attorney for these purposes).

c) How and where can I exercise these rights?

- **By postal mail:**

You can file the letter by sending it to the following postal address: **Avenida de Brasilia, 9-Entreplanta. CP: 28028 Madrid.**

- **By Internet:**

You can file the letter by sending an email to the following address info.atocha@apartamentospelparque.es

In both cases, you must:

- Provide sufficient data and information to meet the request. For these purposes, you may use the form models made available by the Spanish Data Protection Agency <https://www.aepd.es/es/derechos-y-deberes/conoce-tus-derechos>
- Sign the form handwritten or, if applicable, and if you have a recognized digital certificate, sign it electronically.
- Attach a photocopy of DNI, Passport, NIE or other equivalent identification document.

In case of acting on behalf of a third party, a copy of their DNI or equivalent identification document must also be included, as well as the document proving the representation of the interested party and send the form and documents proving their identity by any of the aforementioned means.

d) Additional information.

The Mercantile will analyze whether or not the request is legal. It will inform the petitioner of the decision adopted, proceeding accordingly: if it is upheld, it will adopt the appropriate measures according to the right exercised; if it is dismissed, it will indicate the system of resources provided by law. In the event that the requests are manifestly

unfounded or excessive (eg, repetitive), The Mercantile may: (I) Charge a fee proportional to the administrative costs incurred (II) Refuse to act.

For more information or clarification about your rights in personal data protection, you can send a letter to the following email address info.atocha@apartamentoselparque.es

IV. ADDITIONAL INFORMATION ON DATA PROTECTION.

1. CUSTOMERS AND ASSOCIATES.

Your data is processed by The Mercantile as data controller.

Your personal data will be used for the purpose of maintaining relationships of any kind with our clients as a result of the contractual relationship that we maintain, especially that referring to economic, administrative and fiscal management, quality, and personalized attention necessary to comply with the contractual relationship.

The legality of the treatment is based on article 6.1.b) of the RGPD: *the treatment is necessary for the execution of a contract in which the interested party is a party or for the application at the request of the latter of pre-contractual measures* and 6.1c) of the RGPD: *the treatment is necessary for the fulfillment of a legal obligation applicable to the person in charge of the treatment.*

The term of conservation of your personal data will be, for the duration of the established relationship and once it has ended, they will be kept based on the legal terms of conservation in economic and fiscal matters, which based on the type of document can range from a minimum of 4 years and a maximum of 10 years.

2. SUPPLIERS.

The personal data of the signatory of the contract, as well as of the people who participate or are in contact during the provision of the service, will be processed by The Mercantile, in its capacity as Data Controller.

The legal basis that legitimizes the processing of data is the contractual relationship, for the formalization and execution of the same.

The purpose of the treatment is to maintain the contractual relationship, in the derived economic and technical aspects, as well as the development and control of the contracted service(s) and, where appropriate, sending information on incidents related to them.

The data will not be transferred to third parties, unless they are communicated to public or private entities, to which it is necessary or obligatory to transfer them in order to manage the contractual relationship, as well as in the cases provided, according to Law.

The data will be kept for the time necessary to fulfill the purpose for which it was collected and to determine the possible responsibilities that may arise from said purpose and the

processing of the data and may be required by the competent public authorities (Tax Agency, Courts or Tribunals).

3. SOCIAL NETWORKS.

The Mercantile has different profiles on social networks to publicize its activities and interact with users. Users of these social networks who voluntarily decide to follow or be friends with The Mercantile, express their consent for the processing of their personal data related to their profile to interact on the social network. The Mercantile does not collect data from social networks for purposes other than those mentioned.

The use of social networks involves an international transfer of data for the provision of the service. This communication is made based on the adoption by the social network of standard contractual clauses, in accordance with Decision 2010/87 of the European Commission. You can unfollow or be friends with The Mercantile at any time.

The user must respect the rights of third parties, especially the rights of privacy and data protection, as well as the regulations on intellectual and industrial property, in all the information that The Mercantile publishes on its website.

The publication of information that in any way violates morality, public order, fundamental rights, public freedoms, with special attention to honor, privacy or the image of third parties and, in general, against human rights is prohibited. The web user will be solely responsible for the information published.

We recommend reviewing the privacy settings of the social network and attaching a link to the different privacy policies:

Twitter: <https://twitter.com/es/privacy>

Facebook: <https://es-es.facebook.com/privacy/explanation>

Instagram: <https://es-es.facebook.com/help/instagram/519522125107875>

Linkedin: <https://es.linkedin.com/legal/privacy-policy>

Youtube: <https://www.youtube.com/intl/es/about/policies/#community-guidelines>

4. EMAIL.

The personal data that we process as a result of receiving and/or exchanging emails will be processed for the purpose of attending and responding to your request for information or query, to maintain commercial or professional contacts and relationships that occur as a result of the same, or for the maintenance in its case of a contractual relationship.