



ICLOBY FOUNDATION
Science, Consciousness and Commitment

PRIVACY AND DATA PROTECTION POLICY.

In compliance with the legal obligations established in Regulation (EU) 2016/679, of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and the free movement of such data (RGPD) and the Organic Law 3/2018, of 5 December, on the protection of personal data and guarantee of digital rights (LOPDGDD), the following details the policy for the processing and use of personal data transferred to FOUNDATION LOBBYING, BUSINESS&INNOVATION by its customers and/or users.

This privacy policy may be updated at any time to adapt it to any changes in regulations that may be applicable or to enhance security. In the event of any type of modification, the company will duly notify customers and users of the changes made in the processing of their personal data.

For the purposes of this privacy policy, "user" shall be understood as any natural person interested in the products and services that FOUNDATION LOBBYING, BUSINESS & INNOVATION offers through any of the enabled channels.

FOUNDATION LOBBYING, BUSINESS&INNOVATION, as the party responsible for the processing, will inform the user, prior to providing their personal data, of this privacy policy, requesting their consent when necessary, as well as for any other aspect that requires their prior authorization. The objective of the privacy policy of FOUNDATION LOBBYING, BUSINESS&INNOVATION is to give transparency to the information about the treatment of the data that the user can give to the company in our information systems.

1. Data controller.

Identification data	
Identity	FOUNDATION LOBBYING, BUSINESS&INNOVATION.
C.I.F.	G-67013706.
Business address	Ronda General Mitre, número 49, 5º 2ª – (08017) BARCELONA.
Telephone	+34 657 94 71 97.
E-mail address	info@icloby.com.

2. Purpose and legitimacy.

For what purpose do we process the personal data of customers and users?

- Purposes of a contractual nature for the provision of services. In compliance with a contract , agreement or order, made and/or formalized in any of the modalities accepted by law, for the provision of services related to the business activity of FOUNDATION LOBBYING , BUSINESS&INNOVATION (training services, research, certification and entrepreneurship , lobbying and communication , corporate social responsibility, social innovation and health, with the aim of creating a positive and sustainable social impact on society), as well as for communication and information related to the products and/or services contracted and/or requested.

The data provided will be strictly necessary for the provision of the service , the maintenance of the contractual relationship and bilateral communication between the parties. Failure to provide this information would mean the impossibility of providing the services in an optimal , professional and adjusted way to the tasks entrusted to FOUNDATION LOBBYING , BUSINESS & INNOVATION , preventing its normal development and execution.

- Purposes requiring consent. Specific consent will be required for the processing of personal data for purposes other than those legitimized on the basis of a contractual relationship for the provision of services and , more specifically , those related to commercial and/or advertising actions addressed to the user through any channel , especially with regard to electronic communications.

In any case , explicit consent will not be required from customers and/or users for the processing of their data for commercial and informative purposes if they have freely and voluntarily given their data, to be received through any of the forms and/or tools provided for this purpose, or if this content is part of the previously contracted services, these being considered as a continuous and complementary provision of services to the main one.

This consent will be valid even after the relationship with FOUNDATION LOBBYING , BUSINESS&INNOVATION has ended, without prejudice to the possibility of expressing the contrary by exercising the rights with respect to the personal data provided by the interested party, as provided for in the regulatory regulations and in accordance with this privacy policy.

How long will the personal data be kept?

Users' personal data will be kept for the duration of the contractual relationship with FOUNDATION LOBBYING, BUSINESS&INNOVATION and/or the purpose for which they were provided.

The data of users subscribing to the newsletter and news related to the activity of FOUNDATION LOBBYING , BUSINESS &INNOVATION by e-mail will be kept for as long as the interested party keeps the subscription in force and until the moment he/she requests to unsubscribe.

Who has access to the personal data provided to FOUNDATION LOBBYING, BUSINESS &INNOVATION?

The data processed by FOUNDATION LOBBYING , BUSINESS &INNOVATION are used by the company 's professionals assigned for the correct management and provision of the various services, with the appropriate access authorizations for each of them based on effective systems of protection and confidentiality.

Even so, personal data may be communicated, where appropriate, to:

- Companies owned and/or participated by FOUNDATION LOBBYING , BUSINESS & INNOVATION for the correct execution of the services, as well as for the development of information , commercial and/or promotional actions, for the contracting of products and services with any of these entities and for the management of the relationships that may be maintained with them for the satisfaction of the needs and requirements of the clients.
- Public bodies , courts and tribunals , as well as police and administrative authorities , whenever there is a legal and certified obligation to provide them . In this case , FOUNDATION LOBBYING, BUSINESS&INNOVATION will duly inform the interested parties if the aforementioned event occurs.
- Collaborators of FOUNDATION LOBBYING , BUSINESS &INNOVATION who manage outsourced services for it. The contractual relationship with these collaborators guarantees the security, privacy and confidentiality in the treatment of the personal data of the clients from the corresponding legal mechanisms of protection established between the parts, assuring the respect to the roles of responsible and in charge of the data in agreement with the regulatory norm that is of application.

In all cases , FOUNDATION LOBBYING , BUSINESS &INNOVATION subscribes the corresponding data processing contract on behalf of third parties with suppliers and collaborators by which it imposes , among other obligations , the application of the appropriate technical and organizational measures, the processing of personal data solely and exclusively for the agreed purposes and in accordance with the instructions issued by

FOUNDATION LOBBYING, BUSINESS&INNOVATION, as well as for the prescription to delete and return the data once the provision of services is terminated.

The personal data of FOUNDATION LOBBYING, BUSINESS&INNOVATION's clients are not transferred or ceded to third countries for commercial purposes or of any kind.

3. Rights.

What are the rights of the users?

FOUNDATION LOBBYING , BUSINESS & INNOVATION informs the user about the possibility of exercising the rights of access , rectification , opposition , deletion , portability and limitation of processing , as well as refusing the processing of automated profiles of personal data collected by the company.

Rights with respect to the personal data provided	
Access	The right to access and consult the personal data held in the files of FOUNDATION LOBBYING, BUSINESS&INNOVATION.
Rectification	Right to modify the personal data of its ownership that are inaccurate or erroneous.
Cancellation	Right to request the deletion of personal data when , among others , the data are no longer necessary for the purposes for which they were transferred.
Opposition	In certain circumstances and for reasons related to your particular situation , you may object to the processing of personal data . FOUNDATION LOBBYING, BUSINESS & INNOVATION will stop processing the data , except for legitimate reasons that cannot be waived or for the exercise and defense of possible claims.
Limitation of processing	In view of your status as the owner of your personal data , you may request the limitation of the processing of your personal data in the following cases: <ul style="list-style-type: none"> • During the verification of the accuracy of your data . • When the treatment that is being carried out on your personal data is unlawful , but does not intend to exercise opposition to the deletion of these data . this data . • When FOUNDATION LOBBYING, BUSINESS & INNOVATION does not have to process your need to process your data for any of the accepted reasons , but it needs them for the need it for the exercise or defense of claims . • When there has been opposition to the processing of your personal data for the fulfillment of a public interest mission or for the satisfaction of a legitimate interest , for as long as it is verified whether the legitimate reasons for processing prevail over the user's particulars .
Portability of personal data	The right to receive in electronic format the personal data you have provided to FOUNDATION LOBBYING, BUSINESS&INNOVATION , as well as to request that it be transferred to a third party chosen by the interested party .

Right to lodge a complaint with the supervisory authority	This right is provided for those cases in which the customer has not obtained a satisfactory response from the controller in the exercise of their rights. In Spain, the authority is the Spanish Data Protection Agency - AEPD (http://aepd.es). In Catalonia, it is the Catalan Data Protection Authority - APDCCAT (http://apdcat.cat).
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These rights may be exercised free of charge by the user and, where appropriate, whoever represents him/her, by means of a written and signed request addressed to the following address of FOUNDATION LOBBYING, BUSINESS&INNOVATION, Ronda General Mitre, number 49, 5o 2a in BARCELONA (08017).

This request must contain the reference "Data Protection" and must include the following information: name and surname of the user, address for notification purposes, photocopy of national identity card or passport and request in which the request is specified. In the case of representation, this must be proved by means of a reliable document.

Even so, and even being advisable its priority use to ensure greater speed, the user may exercise these rights through email info@icloby.com, including identical information to that referred to in the case of request by mail, incorporating in the subject of the email "Data Protection".

In addition to the above rights, the user will have the right to withdraw the consent given at any time through the procedure described above, without this withdrawal affecting the lawfulness of the previous treatment. FOUNDATION LOBBYING, BUSINESS & INNOVATION may continue to process the user's data to the extent permitted by applicable law.

FOUNDATION LOBBYING, BUSINESS&INNOVATION reminds the user that he/she has the right to file a complaint with the relevant supervisory authority.

Unsubscribing from the service of sending news and newsletters.

The user has the right to revoke, at any time, the consent given for the sending of commercial and informative communications, through the channels enabled for this purpose, requesting not to continue receiving this type of communications. This is why the user may revoke his/her consent by clicking on the link included in each commercial communication, automatically cancelling the sending of commercial and informative electronic communications.

4. Origin of the data.

The data provided to FOUNDATION LOBBYING, BUSINESS&INNOVATION may come from different means provided for this purpose:

- Information provided when a service provision contract is entered into with FOUNDATION LOBBYING, BUSINESS&INNOVATION.
- Information provided when a fee estimate is accepted, which takes the form of a service commitment.
- When you have registered in one of the channels for sending information related to the activity of FOUNDATION LOBBYING, BUSINESS&INNOVATION.
- When you have made a specific order, including verbal entrustment, for the management and processing of certain services and/or products offered by FOUNDATION LOBBYING, BUSINESS&INNOVATION that do not require, due to its entity, a contractual formalization in documentary and written format.
- When you have contacted the company for any reason related to your activity, by e-mail, in person or by telephone call.
- When a face-to-face or telephone consultation is made.
- When a complaint, claim or suggestion is submitted.

The user will receive all the information regarding the processing of personal data in accordance with this privacy policy in view of the contractual legitimacy that supports the transfer and processing of data necessary for the provision of services by FOUNDATION LOBBYING, BUSINESS & INNOVATION. Even so, the interested party will be offered the possibility of giving their express consent to the processing of their data for purposes other than the main ones.

From what age can the user access the products and services of FOUNDATION LOBBYING, BUSINESS&INNOVATION?

The services of FOUNDATION LOBBYING, BUSINESS&INNOVATION, in principle, are not directed to minors under 18 years of age and, therefore, neither is its web page. By accepting this privacy policy, the user declares and guarantees that he/she is over 18 years of age. The cases of provision of services to minors will be treated exceptionally, requiring the necessary authorizations and consents, established by the applicable legislation in each case, by parents or legal guardians.

5. Measures to guarantee confidentiality and security.

What security measures have we implemented?

FOUNDATION LOBBYING , BUSINESS & INNOVATION is committed to fulfilling its obligation of secrecy of personal data and its duty to protect them and take the necessary measures to prevent alteration , loss, or unauthorized access , in accordance with the conditions and requirements established by applicable law.

FOUNDATION LOBBYING, BUSINESS&INNOVATION has implemented technical and organizational security measures necessary to guarantee the security of the personal data of its clients and users and to avoid its alteration, loss and treatment and/or unauthorized access, taking into account the state of the technology , the nature of the stored data and the risks to which they are exposed , whether they come from human action or from the physical or natural environment, in accordance with what is established by the applicable regulations.

FOUNDATION LOBBYING, BUSINESS&INNOVATION, concerned about privacy, in order to reinforce the confidentiality and integrity of the information in its organization , continuously maintains the supervision, control and evaluation of its processes to ensure respect for the privacy and security of information, according to international standards.

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