

## **PRIVACY POLICY**

By means of this notice, 'Better Business Communication, AB' (hereinafter 'BBI Communication'), informs the users of the website [www.bbicomunication.com](http://www.bbicomunication.com), in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation) and Organic Law 3/18 of 5 December on the Protection of Personal Data and the guarantee of digital rights and other applicable regulations, of its personal data protection policy so that they may expressly, freely and voluntarily decide to provide 'Better Business International Communication Spain, SLU' (hereinafter 'BBI Communication') with their personal data protection policy so that they may expressly, freely and voluntarily decide to provide 'Better Business International Communication Spain, SLU' (hereinafter 'BBI Communication') with their personal data protection policy, freely and voluntarily, to provide 'BBI Communication' with the personal data that is requested of them due to the request for information or for the contracting of the various services that are offered related to language training and intercultural competence to companies and/or individuals.

Unless specifically stated otherwise, it is considered necessary to complete all the data requested on the form or similar form in a true, exact, complete and up-to-date manner. Otherwise, 'BBI Communication' may, depending on the case, not proceed with the user's registration or refuse the specific service requested. All data provided by the user/interested party will be processed in accordance with the characteristics detailed below.

### **Information regarding the processing of personal data**

**Identification of the data controller:** 'Better Business Communication, AB', with registered office at Gumshomsgatan 13, 11460 Stockholm, Sweden, with VAT number SE556570864001, registered in the Mercantile Registry of Stockholm. Contact e-mail addresses: [protecciondedatos@bbicomunication.com](mailto:protecciondedatos@bbicomunication.com) (Spain), [info-se@bbicomunication.com](mailto:info-se@bbicomunication.com) (Sweden) and [info@bbicomunication.com](mailto:info@bbicomunication.com) (Finland).

### **Purpose of processing:**

All data provided will be processed for the following purposes:

- To respond to requests made by the interested party.
- Maintenance of the relationship that may be established.
- Management, administration, information, provision and improvement of the services that you decide to contract.
- Commercial communications related to our products and services.

The personal data provided will be kept for as long as the commercial relationship is maintained, the interested party does not request their deletion, or they are necessary for the purposes of processing. The data will not be destroyed when there is a legal provision that requires its conservation, in which case the data will be blocked, being kept only at the disposal of the Public Administrations, Judges and Courts, for the attention of possible liabilities arising from the processing, during the period of prescription of these.

At present, no automated decisions, including profiling, are made on the basis of your personal data. In the event that such automated decisions are to be made in the future, prior consent will be sought.

**Legitimation of the processing:**

Any processing carried out on your personal data has been previously and expressly consented to by you. You are informed in advance of all those points required by law so that you can give your informed consent.

You may revoke this consent at any time as detailed further on in this document.

**Recipients, assignments and transfers of data:**

Your data will not be transferred to third parties, except when indispensable for the provision of the service or legal obligation.

Likewise, your data will not be transferred to countries outside the European Union unless it is essential for the fulfilment of the purposes, and you authorise us beforehand and expressly.

**Rights of interested parties:**

You may exercise the rights detailed below at any time, to 'BBI Communication Spain' by post to C/Balmes 24, 3<sup>o</sup>-2<sup>a</sup>, 08007 Barcelona, Spain or by e-mail to [protecciondedatos@bbicommunication.com](mailto:protecciondedatos@bbicommunication.com); to 'BBI Communication Sweden AB' by post to Gumshornsgatan 13, 11460 Stockholm, Sweden or by email to [info-se@bbicommunication.com](mailto:info-se@bbicommunication.com); or to 'BBI Communication Finland OY' by post to Ostolaskut 8257A, PL 72, 00521 Helsinki, Finland and email to [info@bbicommunication.com](mailto:info@bbicommunication.com).

The application must contain the name, surname(s) and documentation accrediting the identity of the interested party or their legal representative, as well as a document accrediting representation, the request specifying the request, address for notification purposes, date and signature of the applicant and documents accrediting the request being made. If the application does not meet the specified requirements, it will be required to be corrected.

The rights of data subjects are: access, rectification, limitation, portability, opposition and deletion; and their definition is:

Right of access:

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data relating to him/her are being processed and, if so, the right of access to the personal data and to the following information:

- (a) the purposes of the processing
- (b) the categories of personal data undergoing processing

- (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations
- (d) if possible, the envisaged period of retention of personal data or, if not possible, the criteria used to determine this period
- (e) the existence of the right to request from the controller the rectification or erasure of personal data or the restriction or objection to the processing of personal data relating to the data subject
- (f) the right to lodge a complaint with a supervisory authority
- (g) where the personal data have not been obtained from the data subject, any available information concerning their origin
- (h) the existence of automated decisions, including profiling, as referred to in Article 22(1) and (4) and, at least in such cases, meaningful information about the logic involved and the significance and expected impact of such processing on the data subject.

Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer. The controller shall provide a copy of the personal data undergoing processing. The controller may charge for any further copies requested by the data subject a reasonable fee based on the administrative costs. Where the data subject makes the request by electronic means, and unless the data subject requests otherwise, the information shall be provided in a commonly used electronic format.

#### Right of rectification:

The data subject shall have the right to obtain without undue delay from the controller the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data supplemented, including by means of an additional statement.

#### Right to suppression:

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay. The controller shall be obliged to erase personal data without undue delay where one of the following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- b) the data subject withdraws consent on which the processing is based in accordance with point (a) of Article 6(1) or point (a) of Article 9(2) and there is no other legal basis for the processing.

c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2).

d) the personal data have been unlawfully processed.

(e) the personal data must be erased for compliance with a legal obligation to which the controller is subject under Union or Member State law.

(f) the personal data have been obtained in connection with the offering of information society services referred to in Article 8(1).

Where the controller has made public personal data of which the data subject has exercised his or her right to erasure, the controller shall, taking into account available technology and the cost of implementation, take reasonable steps to notify any third party processing the data of the request for erasure of the data, as well as of any links to that data or any copy or replication of the data.

This right may be limited by other rights such as the right to freedom of expression and information, compliance with a legal obligation, or where there are reasons of public interest.

#### Right to restriction of processing:

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data

b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests restriction of their use instead

c) the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment, exercise or defence of legal claims

d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject

Where processing of personal data has been restricted pursuant to paragraph 1, such data may, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

Any data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction is lifted.

#### Right to object:

The data subject shall have the right, on grounds relating to his or her particular situation, to object at any time to the processing of personal data concerning him or

her which is based on points (e) or (f) of Article 6(1), including profiling based on those provisions.

The controller shall cease to process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where the processing of personal data is for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her, including profiling to the extent that it is related to such direct marketing.

Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes in accordance with Article 89(1), the data subject shall have the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Right to data portability:

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and to transmit those personal data to another controller without hindrance from the controller to which the data have been provided, where:

a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1) and

b) the processing is carried out by automated means.

2. When exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another where technically feasible.

The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out pursuant to Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this is impossible or involves disproportionate effort. The controller shall inform the data subject of these recipients, if the data subject so requests.

**Revocation of consent:** The data subject, who has previously given consent to process his or her personal data, may also withdraw it with equal ease. The withdrawal of consent shall not render the processing previously carried out unlawful.

The data subject shall have the right to lodge a complaint with the competent Supervisory Authority.

When personal data are to be processed at a later date for different purposes, the controller shall inform the data subject of this fact.

**Security measures:** The Data Controller declares that it has adopted the necessary technical and organisational measures to guarantee the security of the data and prevent its alteration, loss, processing or unauthorised access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed, whether from human action or from the physical or natural environment.

The [www.bbicomcommunication.com](http://www.bbicomcommunication.com) website contains links to other websites that may be of interest to the interested party. "BBi Communication" assumes no responsibility for these links, and no guarantee can be given regarding compliance with appropriate privacy policies, so the interested party accesses the content of the aforementioned websites under the conditions of use set out therein and under his or her exclusive responsibility.

If you have any questions, queries or recommendations regarding our Privacy Policy, you can contact us by email at the following addresses:

[protecciondedatos@bbicomcommunication.com](mailto:protecciondedatos@bbicomcommunication.com) (Spain), [info-se@bbicomcommunication.com](mailto:info-se@bbicomcommunication.com) (Sweden) and [info@bbicomcommunication.com](mailto:info@bbicomcommunication.com) (Finland).

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