

PRIVACY POLICY

Effective from 15 November 2024

This Privacy Policy **governs the processing of personal data collected by SAMPOL through the website www.sampol.com** (hereinafter, the “Website”).

Before browsing the Website and providing your data, please **read this Privacy Policy carefully**. Among other aspects, this Policy outlines the categories of personal data we collect, the purposes of processing and the rights granted to you under data protection legislation.

1. DATA CONTROLLER

The **controller of your personal data is SAMPOL INGENIERÍA Y OBRAS S.A.**, with Tax ID No (NIF) A07088206, registered address at Camí del Reis, 308, 1ª Planta Edificio Mapfre, 07010 Palma de Mallorca, Spain, Phone number: +34 971 76 44 76 (hereinafter, “SAMPOL”)

SAMPOL has appointed a Data Protection Officer responsible for ensuring compliance with data protection regulations. You may contact them with any **questions, concerns and/or complaints regarding the processing of your personal data by writing to lop@ Sampol.com**

2. PURPOSES AND LEGAL BASIS FOR PROCESSING

PURPOSE	LEGAL BASIS
Managing, processing and responding to enquiries submitted through the available contact channels.	Consent.
Managing and selecting candidates who submit their CVs via the Website.	Execution of pre-contractual measures.
Including CVs in SAMPOL's database to inform candidates of future opportunities that match their profile and may be of interest to them.	Consent.

Please note: You may withdraw your consent at any time. **However, withdrawal of consent will not have retroactive effects.**



3. CATEGORIES OF PERSONAL DATA

Below is a list of the categories of personal data that SAMPOL may collect through this Website:

- **Identifying data (name(s), surname).**
- **Contact details (phone number, email addresses).**
- **Location data (country).**
- **Browsing data.**

If you submit a **job application, SAMPOL may also process your professional data** (such as profession, current position, company name and duration of employment), as well as any additional information you have chosen to include in your CV.

The personal data requested by SAMPOL is generally mandatory (unless otherwise specified in the relevant field) in order to fulfil the purposes for which it is collected. If you do not provide the requested data or provide it incorrectly, SAMPOL may not be able to properly process your request.

4. DATA RETENTION

Personal data included in requests, enquiries, issues, complaints or queries submitted by users **will be retained for the time necessary to process, manage and/or respond to them.** Once this period has ended, the data will remain blocked for the statutory limitation period applicable to any potential legal actions arising from them.

Personal data provided by candidates applying for job offers available on the Website **will be retained for the duration of the entire hiring process.** If the candidate has given their consent for SAMPOL to retain their CV for future recruitment processes, their data will be kept until they withdraw consent, and in any case, for a maximum period of 24 months.

5. RECIPIENTS

Personal data collected through this Website will not be disclosed or transferred to third parties, except in the following cases:

1. **Public Administrations, in cases provided by law, based on the fulfilment of a legal obligation.**
2. **Courts and Tribunals, in cases provided by law, based on the fulfilment of a legal obligation.**
3. **Third-party service providers who process data on behalf of and under the instructions of SAMPOL for the purpose of providing services. Service providers are obligated to maintain the confidentiality of the data and use it only under SAMPOL's instructions.**

SAMPOL guarantees that the personal data collected through this Website will not be transferred outside the European Economic Area (EEA) unless there is an adequacy decision by the European Commission or appropriate and sufficient safeguards are implemented to ensure the security and protection of your personal data.



6. DATA SUBJECT RIGHTS

As a data subject, you may exercise the following rights:

- **Right to obtain confirmation from SAMPOL as to whether or not personal data concerning you is being processed.**
- **Right of access to your data.**
- **Right to obtain from SAMPOL, without undue delay, the rectification of inaccurate personal data concerning you.**
- **Right to obtain from SAMPOL, without undue delay, the erasure of personal data concerning you when any of the conditions set out in data protection regulations are met.**
- **Right to receive the personal data you have provided to SAMPOL in a structured, commonly used and machine-readable format, and to transmit it to another controller without hindrance from SAMPOL.**
- **Right to object, at any time and on grounds related to your particular situation, to the processing of your personal data. SAMPOL will cease processing your data unless it can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims.**
- **Right not to be subject to automated decision-making, including profiling.**

You may exercise your rights by sending a written request to SAMPOL's Data Protection Officer at lopdp@sampol.com, or by posting a letter to SAMPOL's registered address.

Finally, you are informed that you have the right to file a complaint with the Spanish Data Protection Agency (AEPD) at www.aepd.es if you believe that SAMPOL has violated any of your data protection rights.

7. SECURITY MEASURES

SAMPOL informs you that it has implemented the necessary technical and organisational **security measures to ensure the protection of your personal data and to prevent its alteration, loss, unauthorised processing and/or access**, taking into account the state of the art, the nature of the data stored and the risks to which it is exposed, whether they originate from human action or physical or natural causes.

8. COOKIES

This Website **uses cookies to enhance your browsing experience and personalise content**. To learn more about what cookies are, how we use them, and how you can manage your preferences, please refer to our Cookie Policy.



9. MODIFICATION OF THE PRIVACY POLICY

SAMPOL reserves the right to modify this Privacy Policy at its own discretion, in response to legislative, jurisprudential or doctrinal changes issued by the Spanish Data Protection Agency.

We will inform you of any changes by publishing the updated Privacy Policy on the Website and displaying a corresponding notification on the homepage.

10. APPLICABLE LAW AND JURISDICTION

Any **disputes or claims** arising from the interpretation or enforcement of this Privacy Policy shall be governed by **Spanish law** and shall be subject to the **jurisdiction of the Courts and Tribunals of Palma de Mallorca**.