

PRIVACY AND DATA PROTECTION POLICY

OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. are companies in which information transparency is essential for establishing relationships of trust with the people who make up our project and with our suppliers and customers and protecting the personal data of those who trust us is of vital importance. Accordingly, we want this Privacy and personal data protection policy to inform you how we collect, process and use the data.

This Privacy and Personal Data Protection Policy establishes the bases on which OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P., with registered address at Rambla De Catalunya Nº73 1º, 08007 Barcelona (Barcelona), processes the personal data that our users voluntarily send us through the website.

This Policy will always be applicable when data is sent to OTIS Advocaten Spanje S.L. and/or OTIS International Lawyers S.L.P., which will be responsible for your data (Data Controller), including data entered in any of the contact or subscription forms which collect personal data (name, email, etc).

OUR COMMITMENT

- *To respect the privacy of our users and process their personal data with their consent.*
- *To process the personal data that we strictly need to provide the requested service and process the data securely and confidentially, taking the necessary measures to prevent unauthorized access and improper use thereof.*
- *Not to use personal data for purposes for which we have not previously obtained consent.*
- *Not to send personal information to third parties or share such data.*
- *To keep personal data for as long as is strictly necessary for the specific purpose for which the data were provided, with regular revision of those needs and deletion of data that are not necessary.*

WHAT PERSONAL INFORMATION DO WE USE?

Through our website we may collect personal data for different purposes:

- *User information request.*
- *Subscribe to newsletters.*
- *Work with us by sending curriculum vitae.*

Depending on the purpose for which the data are provided, only the strictly necessary data will be requested.

It is important for the user to be aware of the data provided and the purpose for which it is provided because in so doing, s/he authorizes us to collect, store and use such data for the required purpose and s/he may at any time withdraw the consent provided by the appropriate channels, with the consent of the interested party being the legal basis and legitimacy of the processing of their personal data.

DATA ACCURACY AND TRUTHFULNESS

The user, when providing the data required on forms, is solely responsible for the truthfulness of the data submitted, and guarantees and is accountable for the accuracy, validity and authenticity of the personal data provided and undertakes to keep the data updated.

WHAT RIGHTS DO YOU HAVE OVER THE PERSONAL DATA PROVIDED?

Once the personal information is provided, you will have the right to:

- *ask any question and be informed about how we use the data and obtain **ACCESS** to the data.*
- *request that your information be corrected or **DELETED** or that **RESTRICTIONS** be imposed on its processing.*
- ***OBJECT** to the processing of your data*
- ***WITHDRAW** your consent subject to legal or contractual restrictions.*
- ***DATA PORTABILITY.***

You can exercise these rights at any time, in writing, with proof of your identity, addressed to OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P., Rambla De Catalunya Nº73 1º, 08007 Barcelona (Barcelona), or using the e-mail address: info@otisadvocaten.es.

You can also lodge a complaint with the control authority, in this case, the Spanish Data Protection Agency, if you believe that the processing of your personal data violates the applicable legislation.

DATA SECURITY AND STORAGE

We will retain the data for the time strictly necessary for the provision of the requested service and as long as the owner does not request its deletion, adopting the appropriate technical and organizational measures against unauthorized or illegal processing and against accidental loss, destruction or damage, and doing everything possible to protect and maintain the data securely.

ADDRESSEES OF PERSONAL DATA:

It is not permitted to allow the data transfer except in those cases in which a legal obligation is binding. There is no forecast of international data transfer.

LEGAL ANNOUNCEMENT LSSI – CE

In compliance with Law 34/2002 of July 11, of the Information and E-Commerce Society Services, the Corporate Entity informs that it is the owner of the web site. According to what is required under article 10, subject to Law above mentioned and such informs the following:

The owner of the web site is: OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P.

Tax ID: B64021215 and ESB66687617

Main Office address: Rambla De Catalunya Nº73 1º, 08007 Barcelona (Barcelona)

USERS

The Access and/or use of the site grants you the condition of USER, which you accept, under the General Terms of Use hereby stated. Such Terms will be applied independent of the General Terms of Agreement which in your case are mandatory.

USE OF THE WEBSITE

The web page grants access to a great amount of information, services, programs or data (onwards, “the contents”) in Internet belonging to OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. or its licensors to whom the USER can have access. The USER undertakes the responsibility of the use of the web site. Such responsibility is extended to the necessary registration to access to certain services or contents.

In such registry the USER will be responsible of providing truthful and legal information. As a consequence of this registration, the USER can be provided with a password of which he will be made responsible, compromising to make diligent and confidential use of same. The USER agrees to make the correct use of contents and services which OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. offer through its web site and, being of meaningful but not with limitative character and these shall not be used for:

- (i) Incurring in illicit activities, illegal or opposed to good faith and public order.*
- (ii) Spreading contents or propaganda considered; racist, xenophobic, pornographic-illegal, of terrorism apology or attempting against human rights.*
- (iii) Causing damages on the physical or logical systems of OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. Its suppliers or third parties, introducing or spreading computer virus on the web or any other physical or logic systems which may cause damages such as the mentioned before.*
- (iv) Trying to access and, in your case, using the email accounts of other users and modify or manipulate their messages OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. reserve the right to withdraw any comments or try to access and , in your case, use the email accounts of other users and modify or manipulate their messages reserves the right to withdraw all those comments or input which violate the respect for the dignity of a person, which are discriminatory, xenophobic, racist, that attempt against childhood or infancy, order or public security or that, in our opinion, are not fit for publication. In any case OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. will not be responsible for the opinions given by users through forums, chats or other participation tools.*

INTELLECTUAL AND INDUSTRIAL PROPERTY

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All rights reserved. According to articles 8 and 32.1, second paragraph, of the Intellectual Property Law; reproduction, distribution and public communication are expressly forbidden, including the way of making available, totally or partially the contents of this web page, for business purposes, by any support or technical means, without the authorization of OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. The USER promises to respect the rights of Intellectual and Industrial Property, owned by OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P., will be able to visualize the elements of the site including print, copy or store them in the hard drive or your computer or any other physical support as long as it is solely and exclusively for its personal and private purpose. The USER will refrain from suppressing, altering, eluding or manipulating any protection device or

security system installed in the pages of OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P.

EXCLUSION OF GUARANTEES AND RESPONSABILITIES

OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. will not be responsible, under no circumstance, for damages of any nature caused by mistakes or omissions, lack of responsibility of the site or virus contamination or malicious programs or harmful in its contents, in spite of having taken all necessary technological measures to prevent it.

MODIFICATIONS

OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. reserve the right, without prior notice, to make changes considered necessary thus, being able to change, eliminate or add not only the contents and services rendered by it but also the way in which they are presented or located in the site.

LINKS

In the case that in the web page, links or hyperlinks were made to other internet sites, OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. will not execute any type of control of such sites and contents. OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. under no circumstance will take any responsibility for the contents of some link belonging to another web site, nor guarantee the technical availability, quality, reliability, accuracy, veracity, validity or constitutionality of any material or information contained in none of such hyperlinks or other internet sites.

Likewise, the inclusion of these external connections will not imply any kind of association, merging or participation with the connected entities.

EXCLUSION RIGHTS

OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. reserve the right to deny or withdraw access to site and/or services offered, with no previous notification, on its own or a third party, to those users who do not comply with the current General Conditions of Use.

GENERALITIES

OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. will chase the non-compliance of present conditions, as well as any doubtful use of its site by enforcing all civil and penal actions which might correspond.

OF THE PRESENT CONDITIONS AND DURATION

OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. could modify at any time the conditions hereby determined, being duly published as appearing herewith.

The validity of the conditions above will be according to its exhibition and will be valid until duly published or modified by other.

APPLICABLE LAW AND JURISDICTION

The relationship between OTIS Advocaten Spanje S.L. and OTIS International Lawyers S.L.P. and the USER will be governed by the Spanish regulations in force and any controversy will be submitted to the Courts of the city of Barcelona.