

PRIVACY POLICY AND EXERCISE OF RIGHTS BY PERSONAL DATA HOLDERS WITH REGARD WITH UNIVERSIDAD PONTIFICIA COMILLAS

On May 25th, 2018, the Regulation (EU) of the European Parliament and the Council of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, "GDPR")

In compliance with the Regulations' guidelines, Universidad Pontificia Comillas Has designed a privacy policy and established the required means and procedures to execute it.

Such policy is born from the acknowledgement that the University, for exercising their functions, accesses and processes personal data from students, employees and third parties.

This access and processing follows a **principle of minimum standards**, and only those data required to perform university functions shall be collected.

You are therefore informed that the University, as Controller of such data, applies the appropriate technical and organizational measures to guarantee that, by default, only personal data which are **required for each specific data processing purpose** are processed, minimising the amount of personal data that are actually collected, the scope of their processing, their retention period and their accessibility privileges. Such measures guarantee, in particular, that personal data are by default not accessible to an indeterminate number of natural person.

PURPOSES OF DATA PROCESSING

Universidad Pontificia Comillas processes your personal data for the following purposes.

- Management and development of legal and/or contractual relationships, and management of the academic records of students.
- Invoicing management.

- Using the student's image in a purely ancillary or contextual manner, for the purposes of providing corporative information for the University.
- Sending relevant information regarding activities developed by the University.

LEGAL BASES OF DATA PROCESSING

- Subscription, execution and development of legal and/or contractual relationships between the data holder and the University.
- Compliance with legal requirements.
- Legal interest of Universidad Pontificia Comillas.

MEASURES ADOPTED BY UNIVERSIDAD PONTIFICIA COMILLAS IN ORDER TO GUARANTEE SAFETY OF YOUR PERSONAL DATA

The University has adopted the following measures to guarantee respect for data protection from the very beginning:

- A Data Protection Officer has been designed.
- Appropriate safety principles have been set.
- The required document requirements in order comply with the relevant Regulation have been revised.
- The impact that our procedures may have on protection of your personal data.

Pursuant the current regulations regarding personal data protection, the University informs that they are complying with the provisions of the GDPR and of Organic Act 15/1999 of 13 December on Personal Data Protection (hereinafter LOPD as per its Spanish acronym) and expressly with the principles set forth in article 5 of the GDPR and article 4 of LOPD, by reason of which they are processes legally, in good faith and in a transparent manner with regard to the interested party and and in an appropriate and restricted manner with regard to their intended purpose.

UPDATES OF THIS POLICY

This policy has been updated to conform to the provisions of Regulation (EU) of the European Parliament and the Council of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, "GDPR")

Besides, it is hereby stated that such policy may be modified due to potencial changes in the requirements established by the current regulations from time to time, or required by judicial rulings or changes in jurisprudence.

DATA RETENTION POLICY

Data shall be kept for the period required to complete the purposes for which they are collected and to establish any possible liability that may arise from such purposes and the processing of data. The provisions in the documentation and filing regulations shall apply.

You may access the personal data retention policy of the University on the following link: <http://www.comillas.edu/es/protecciondedatos>

DATA CONTROLLER

- Identity: Universidad Pontificia Comillas (hereinafter “the University”).
- Postal address: Calle Alberto Aguilera, 23, 28015 Madrid.
- E-mail address of the Data Protection Officer: dpo@comillas.edu

EXERCISING YOUR RIGHTS

The GDPR recognises personal data holders new rights beyond the traditional rights of access, rectification, cancellation and opposition:

- Right to be forgotten (right of removal)
- Right to limitation to data processing.
- Right to data portability.
- Right to not being subject to individual decision-making

Besides, they shall be entitled to:

- Not being subject to a decisions purely based on automatised processing of your personal data.
- Renewing the consent given.
- Right to submit a complaint before the Spanish Agency for Data Protection when the processing is not deemed to be appropriate to current legislation regarding personal data protection. You may find all necessary information at: www.agpd.es

You may exercise the aforementioned rights and make any inquiry regarding your personal data processing by sending an e-mail to the Data Protection Officer dpo@comillas.edu or a letter to Secretaría General at Calle Alberto Aguilera, 23, 28015 Madrid. For the purposes of answering your request, you must certify your identity by sending a copy of your DNI (Spanish ID document), NIE (Spanish ID document for non-citizens), Passport or equivalent document.