

# Privacy Policy

## 1 PRIVACY AND DATA PROTECTION POLICY

In compliance with the provisions of the current legislation, MONDRAGON ASSEMBLY S. COOP. ([www.mondragon-assembly.com](http://www.mondragon-assembly.com), hereinafter, the *Website*) undertakes to adopt the necessary technical and organisational measures, according to the appropriate level of security to the risk of the data collected.

### Laws covered by this privacy policy

This privacy policy is adapted to the current Spanish and European regulations on personal data protection on the Internet. Specifically, it complies with the following standards:

- Regulation (EU) 2016/679 of the European Parliament and 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).
- Act 34/2002, of 11 July, on Services of the Information Society and Electronic Commerce (LSSI-CE).

### Identity of the entity responsible for the processing the personal data

The entity responsible for processing the personal data collected (“Data Processor”) is: MONDRAGON ASSEMBLY S. COOP., NIF-F20165940, registered in the Register of Cooperatives under No. SS-621 on 10/05/1988, and registered in the Register of Cooperatives of the Basque Country under No. 94/86, sheet GUI-195, record 195.

Its contact details are as follows:

Address:

Polígono Industrial Baintxe – Pab. 5A  
20550 ARETXABALETA (Gipuzkoa) · SPAIN  
Contact telephone: +34 943 71 20 80  
Contact email: [info@mondragon-assembly.com](mailto:info@mondragon-assembly.com)

### Registration of Personal Data

The personal data collected by MONDRAGON ASSEMBLY S. COOP. comprise only the collection of the Curriculum Vitae (CV), which the User voluntarily uploads to the Website (**Join us**), following acceptance of this privacy policy, and the identification data for maintaining the distribution list or newsletter (**Contact**). The CV shall be kept on the premises of MONDRAGON ASSEMBLY S. COOP. for a period no longer than that specified in the **personal data retention periods**

## Principles applicable to the processing of personal data

The processing of the User's personal data shall be subject to the following principles contained in Article 5 of the RGPD:

- Principle of legality, loyalty and transparency: the consent of the User shall be required at all times with information completely transparent regarding the purposes for which the personal data are collected.
- Principle of limitation of purpose: personal data shall be collected for specific, explicit and legitimate purposes.
- Principle of minimisation of data: the personal data collected shall only be that strictly necessary in relation to the purposes for which they are processed.
- Principle of accuracy: the personal data should be accurate and always up to date.
- Principle of limitation of the conservation period: the personal data shall be maintained only in a way that allows the identification of the User during the time necessary for the purposes of their processing.
- Principle of integrity and confidentiality: the personal data shall be treated in a way that guarantees its security and confidentiality.
- Principle of proactive responsibility: the Data Processor shall be responsible for ensuring that the above principles are met.

## Categories of personal data

MONDRAGON ASSEMBLY S. COOP. shall only keep only Curriculum Vitae documents and identification data to maintain the distribution list or newsletter. In no case shall special categories of personal data be processed in the context of Article 9 of the RGPD.

## Legal basis for the processing of personal data

The legal basis for the processing of personal data is the consent. MONDRAGON ASSEMBLY S. COOP. undertakes to seek the express and verifiable consent of the User for the processing of their personal data for one or more specific purposes.

The User shall have the right to withdraw their consent at any time. It shall be as easy to withdraw consent as to give it. As a general rule, withdrawal of consent shall not condition the use of the Website.

In cases where the User should or may provide their data through forms for consultation or request information or for reasons related to the content of the Website, they shall be informed in case that the completion of any of them is mandatory, as they are essential for the correct development of the operation performed.

## **Purposes of the processing to which the personal data are destined**

The personal data is collected and managed by MONDRAGON ASSEMBLY S. COOP in order to facilitate, expedite and fulfil the commitments established between the Website and the User or the maintenance of the relationship established in the forms filled in by the latter or when responding to an application or inquiry.

The purpose of the collection and processing of personal data that we request is to select personnel for a position and to send you our publications and promotions of products and services.

## **Periods of retention of personal data**

Personal data shall only be retained for the minimum time necessary for the purposes of its processing and, in any case, only during the following period: 18 months, or until the User requests their deletion.

When the personal data is obtained, the User shall be informed about the period during which the personal data shall be kept or, when that is not possible, the criteria used to determine this period.

## **Recipients of personal data**

The personal data of the User shall not be shared with third parties.

## **Secrecy and security of personal data**

MONDRAGON ASSEMBLY S. COOP. undertakes to adopt the necessary technical and organisational measures, according to the level of security appropriate to the risk of the data collected, so as to guarantee the security of personal data and to prevent accidental or unlawful destruction, loss or alteration of personal data transmitted, preserved or otherwise processed, or unauthorised communication or access to said data.

The Website has an SSL (Secure Socket Layer) certificate, which ensures that personal data is transmitted in a secure and confidential manner, as the data is transmitted between the server and the User, and in feedback, with full encryption.

Notwithstanding, as MONDRAGON ASSEMBLY S. COOP. is not able to guarantee the impregnability of the internet or the total absence of hackers or others who may fraudulently access personal data, the Data Processor undertakes to notify the User

without undue delay when a breach of the security of personal data occurs that is likely to entail a high risk for the rights and freedoms of natural persons. In compliance with the provisions of Article 4 of the RGPD, violation of the security of personal data shall mean any breach of security that causes the destruction, loss or accidental or unlawful alteration of personal data transmitted, preserved or otherwise processed, or the unauthorised communication or access to said data.

Personal data shall be treated as confidential by the Data Processor, which undertakes to inform and guarantee through, a legal or contractual obligation, that such confidentiality is respected by its employees, associates, and any person to whom the information accessible is granted.

## Rights derived from the processing of personal data

The User has, in relation to MONDRAGON ASSEMBLY S. COOP., and may, therefore, exercise the following rights acknowledged in the RGPD with the entity responsible for the processing.

- *Right of access:* The User has the right to obtain confirmation as to whether MONDRAGON ASSEMBLY S. COOP. is processing their personal data and, if so, obtain information about their specific personal data and processing that MONDRAGON ASSEMBLY S. COOP. has performed, as well as, among others, the available information on the origin of said data and the recipients of the communications made or planned.
- *Right of rectification:* The User has the right to modify their personal data that prove to be inaccurate or, considering the purposes of the processing, incomplete.
- *Right of suspension (“right to be forgotten”):* The User has the right, provided that the current legislation does not establish otherwise, to request the deletion of their personal data when these are no longer necessary for the purposes for which they were collected or processed; the User has withdrawn their consent to the processing, and this does not have another legal basis; the User is opposed to the processing, and there is no other legitimate reason to continue therewith; the personal data have been processed illicitly; the personal data should be deleted in compliance with a legal obligation; or the personal data have been obtained as a result of a direct offer of the company’s services to a child under 14 years of age. In addition to deleting the data, the Data Processor, considering the available technology and the cost of its application, shall take reasonable measures to inform those responsible who are processing the personal data of the interested party’s request to delete any link relating to that personal data.
- *Right to limitation of processing:* It is the User’s right to limit the processing of their personal data. The User has the right to obtain the limitation of the processing when they challenge the accuracy of their personal data; the processing is illegal; the Data Processor no longer needs the personal data, but the User needs it to make claims; and when the User has opposed the processing.

- *Right to data portability:* In the event that the processing is carried out by automated means, the User shall have the right to receive from the Data Processor their personal data in a structured format, of common use and with mechanical reading, and to transmit them to another data processor. Whenever technically possible, the Data Processor shall transmit the data directly to the other data processor.
- *Right of opposition:* The User has the right not carry out the processing of their personal data or to cease the processing thereof by MONDRAGON ASSEMBLY S. COOP.
- *Right not to be the subject of a decision based solely on automated processing, including profiling:* The User has the right not to be subject to an individualised decision based solely on the automated processing of their personal data, including the preparation of profiles, existing unless otherwise established by the current legislation.

Thus, the User may exercise their rights by means of a written communication addressed to the Data Processor with the reference “RGPD – [www.mondragon-assembly.com](http://www.mondragon-assembly.com)”, specifying:

- Full name of the User and copy of the DNI. In the cases in which the representation is admitted, the identification shall also be required by the same means of the person representing the User, as well as the document accrediting the representation. The photocopy of the DNI may be substituted, by any other means valid in the law that proves the identity.
- Petition with the specific reasons for the request or information to which access is intended.
- Address for the purpose of issuing notifications.
- Date and signature of the requester.
- Any document that certifies the request being formulated.

This request and any other attached document may be sent to the following email address:

Email: [info@mondragon-assembly.com](mailto:info@mondragon-assembly.com)

## **Complaints before the supervisory authority**

In the event that the User considers that there is a problem or violation of the current regulations in the way in which their personal data are being processed, they shall have the right to effective judicial protection and to file a complaint at a supervisory authority, in particular, in the state of their habitual residence, place of work or place of the alleged violation. In the case of Spain, the supervisory authority is the Spanish Agency for Data Protection (<http://www.agpd.es>).

## 2 ACCEPTANCE AND CHANGES TO THIS PRIVACY POLICY

It is necessary that the User has read and is satisfied with the conditions on the protection of personal data contained in this Privacy and Cookies Policy, and that they accept the processing of their personal data so that the Data Processor can proceed thereto in the form, during the deadlines and for the purposes indicated. The use of the Website implies the acceptance of the Privacy and Cookies Policy thereof.

MONDRAGON ASSEMBLY S. COOP. reserves the right to modify its Privacy and Cookies Policy, according to its own criteria, or motivated by a legislative, jurisprudential or doctrinal change of the Spanish Agency for Data Protection. Changes or updates to this Privacy and Cookies Policy shall be notified explicitly to the User.

This Privacy and Cookies Policy was updated for the purposes of adaptation to Regulation (EU) 2016/679 of the European Parliament and 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).