

□ File No.: EXP202207225

RESOLUTION OF TERMINATION OF THE PROCEDURE FOR PAYMENT

VOLUNTEER

Of the procedure instructed by the Spanish Agency for Data Protection and based on
to the following

BACKGROUND

FIRST: On July 15, 2022, the Director of the Spanish Agency for
Data Protection agreed to initiate a sanctioning procedure against the FEDERATION OF
ATTENTION TO THE CITIZENSHIP OF THE WORKERS' UNION UNION (FAC-USO) (in
hereinafter, the claimed party), through the Agreement that is transcribed:

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File No.: EXP202207225

AGREEMENT TO START A SANCTION PROCEDURE

Of the actions carried out by the Spanish Data Protection Agency and in
based on the following

FACTS

FIRST: A.A.A. (hereinafter, the complaining party) dated October 5, 2021
filed a claim with the Spanish Data Protection Agency. The motives
on which the claim is based are as follows:

The claimant states that at the time he exercised the right to delete data
before Union Sindical Obrera (USO), although this Union has sent
various emails, to your professional email address, being
sent on dates May 17, 2018, July 21, 2020, October 15, 2020 and
September 22 and 29, 2021. He indicates that on July 23, 2020 he went to the
aforementioned Union, by email provided, reminding them of the obligation

to delete your personal data, receiving a response on July 30, 2020, apologizing for the mistake, blaming it on using an old database, and signaling that they would correct the situation. However, on October 15, 2020 and September 29, 2021, the complaining party has received new emails from said Labor union.

The complaining party provides a copy of the aforementioned emails, all of them sent or addressed to "USO Social Security". In the text of these communications it is made

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mention to the organizations USO and FEDERATION OF ATTENTION TO THE CITIZENSHIP OF USE (AGE Sector), with NIF ***NIF.1 (hereinafter the part claimed or FAC-USO).

The emails that gave rise to the claim were sent from FAC-USO domains.

This can be seen in the legal notice inserted in one of the emails, which indicates:

"Copyright © 2016 FAC-USE. All rights reserved. Federation Attention to the Citizenship of the Unión Sindical Obrera... Complying with Spanish legislation on data protection and our strict privacy policy, your email address is included in a personal data file owned by the Federation Attention to the Citizenship of the USO (Unión Sindical Obrera), created for the distribution of information related to union activity. If you do not want to receive more information, you can unsubscribe sending an email to: info.age@facuso.com or in writing at any of our provincial delegations.

SECOND: In accordance with article 65.4 of Organic Law 3/2018, of 5

December, of Protection of Personal Data and guarantee of digital rights (in hereinafter LOPDGDD), said claim was transferred to the USO entity, so that proceed to its analysis and inform this Agency within a month of the actions carried out to adapt to the requirements set forth in the regulations of Data Protection.

The transfer, which was carried out in accordance with the regulations established in Law 39/2015, of October 1, of the Common Administrative Procedure of the Administrations Public (hereinafter, LPACAP), was collected on 11/05/2021 as recorded in the acknowledgment of receipt that works in the file.

On 12/02/2021, this Agency received a written response from the entity FAC-USO indicating that the complaining party had already claimed its right to suppression to the Trade Union Section in 2018. You are aware of not being able to send communications to the complaining party.

(...) sends through an internal mail, similar to an intranet, to all the groups trade unions, federations and provincial directorates, lists of all users who there, updated. Received this list, the Trade Union Section remakes the entire list, it is that is, it copies all the data, of the entire generic list, independently, in another place, to be able to separate the contacts by lists individualized and to be able to do manual searches of the contacts that have requested that informative communications not be sent to them. It is a very laborious, costly and excessive, which the Trade Union Section carries out in order to comply with the rights of suppression of the interested party, but that escapes on many occasions to the control of the USO Trade Union Section itself.

FAC-USO shows its willingness to review the protocols and assess channels alternatives for sending informative communications electronically.

THIRD: On January 5, 2022, in accordance with article 65 of the

LOPDGDD, the claim filed by the claimant was admitted for processing.

FOURTH: Through the General Subdirectorate of Data Inspection, access to the

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following documentation, which is incorporated into the proceedings:

1. Confederal Statutes of the Workers Union Union (USO), obtained from the website "uso.es".

“Chapter IV. Structure of the Workers' Trade Union

Article 14. State Professional Federations and Territorial Unions

1. For the development of its objectives, the Unión Sindical Obrera is structured in Federations Professionals and Territorial Unions...

Article 15. State Professional Federations

1. They group their affiliation, throughout the territory, from the union sections. I know organized in Regional, National or Autonomous City Federations.

2. They may establish sectoral structures internally, providing each sector, in the framework of the statutes of their respective Federation, of autonomy to organize themselves, define the trade union action and manage collective bargaining in its field.

Article 16. Federal Structure

The people affiliated to the USO are framed in the following Professional Federations:

1. Federation of Industry (FI-USO).
2. Federation of Services (FS-USO).
3. Federation of Attention to Citizenship (FAC-USO).
4. Education Federation (FE-USO).

5. Federation of Private Security Workers (FTSP-USO)".

"Article 24. Statutes of the Territorial Unions and Professional Federations

1. Professional Federations and Territorial Unions will be provided with Statutes and

Own regulations that must be registered. In accordance with the provisions of the Organic Law

11/1985, of August 2, on Trade Union Freedom, will have their own legal personality. will define

the corresponding objectives, structure and operation, according to its characteristics and

specificities...".

2. Statutes of the entity Federation Attention to Citizenship (FAC USO), obtained

of the website "****URL.1".

"Chapter I. Name, domicile and scope.

Article 1. With the denomination of the Federation of Attention to the Citizenship of the Union

Sindical Obrera, in acronym FAC-USO, is constituted a trade union organization that declares itself

autonomous within the scope of Spanish territory, integrated into the Trade Union Confederation of the

Unión Sindical Obrera, subscribing to its fundamental objectives and assuming the rights and

duties arising from these Statutes...

The FAC-USO is constituted under current legislation and its headquarters are located in...".

"Article 3. Its territorial scope will be that of Spain, its functional scope being the following:

3.1.- General State Administration:

- State Civil Administration.

- Military Administration (civilian personnel).

- Administration of the Managing Entities and Common Services of the Social Security. -

Justice administration.

- Educational Administration (non-teaching staff).

- Post and Telegraph.

- State Tax Administration Agency.

- Public Service Entities, or Public Law Corporations...".

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“Chapter III. Constitution

Article 6. The FAC-USO brings together the members who provide their services in the different sectors indicated in art. 3 of these Statutes through a relationship of employment of an administrative, labor or statutory nature. It also covers workers from sectors of the private sphere whose public service function and relationship with any of the public sectors advise it”.

3. Privacy Policy of the entity Federation Attention to Citizenship (FAC

USO), obtained from the “***URL.1” website.

“...it is reported that the personal data that is collected directly from the user through through the different resources available in the portals dependent on the FAC-USO (www.***URL.1 (https://www.***URL.1) and formacion.***URL.1 (https://formacion.***URL.1), will be treated confidentially and will be incorporated into the respective files of the which the FAC-USO is responsible, with the purposes detailed in the Regulations of the Spanish Data Protection Agency... and European Data Protection Regulation... not being used for purposes incompatible with these...

Those affected can exercise their rights of access, rectification, cancellation and opposition before the FAC-USO, by email addressed to...”.

FOUNDATIONS OF LAW

Yo

In accordance with the powers that article 58.2 of Regulation (EU) 2016/679

(General Data Protection Regulation, hereinafter RGPD), grants each

control authority and as established in articles 47, 48.1, 64.2 and 68.1 of the LOPDGDD, is competent to initiate and resolve this procedure the Director of the Spanish Data Protection Agency.

Likewise, article 63.2 of the LOPDGDD determines that: "The procedures processed by the Spanish Agency for Data Protection will be governed by the provisions in Regulation (EU) 2016/679, in this organic law, by the provisions regulations issued in its development and, as long as they do not contradict them, with a subsidiary, by the general rules on administrative procedures.

II

The Union Sindical Obrera (USO), for the development of its objectives, is structure in Professional Federations and Territorial Unions.

FAC-USO is a professional federation integrated into the confederal organization USO, endowed with its own Statutes and Regulations. It adopts the legal form of a "union" and, As such, it has its own legal personality and full capacity to act, in accordance with the established in article 4.1 of Organic Law 11/1985, of August 2, on Freedom Union, according to which:

"The unions established under this Law, to acquire legal personality and full capacity to act, must deposit, through their promoters or leaders, their statutes in the public office established for that purpose.

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Regarding the "Responsibility of unions", article 5.1 of the aforementioned Law

Organic sets:

“The unions constituted under the protection of this Law shall be liable for the acts or agreements adopted by their statutory bodies in the sphere of their respective competencies”.

The USO Confederal Statutes themselves establish that it is made up of Professional Federations and Territorial Unions, which "will be endowed with Statutes and Own regulations that must be registered. In accordance with the provisions of the Law Organic Law 11/1985, of August 2, on Freedom of Association, will have legal personality own. They will define the corresponding objectives, structure and operation, according to its characteristics and specificities.

In the same way, the FAC-USO Statutes indicate that with this denomination "the constitutes a trade union organization that declares itself autonomous within the scope of the Spanish territory, integrated in the Trade Union Confederation of the Workers Trade Union, subscribing to its fundamental objectives and assuming the rights and duties arising from these Statutes", which "is constituted under the protection of the current legislation".

On the other hand, FAC-USO is the entity responsible for the personal data collected and treated in their area of responsibility. As stated in the privacy policy inserted on its website ([***URL.1](#)), is responsible for the personal data it collects.

In this case, the responsibility for the facts denounced must be imputed to the FAC-USO, as it is the entity responsible in its field of action, in this case, the General Administration of the State, with capacity and autonomy to organize your activity. FAC-USO itself is responsible for sending the emails electronic devices object of the claim, and FAC-USO is the entity to which the party

The claimant expressed his opposition to the receipt of such emails and the cancellation of his distribution lists.

Article 4 of the RGPD, under the heading "Definitions", provides the following:

“2) «processing»: any operation or set of operations performed on data

personal data or sets of personal data, whether by automated procedures or not,

such as the collection, registration, organization, structuring, conservation, adaptation or

modification, extraction, consultation, use, communication by transmission, diffusion or

any other form of authorization of access, collation or interconnection, limitation, suppression or

destruction”.

In accordance with these definitions, the sending of electronic communications

object of the claim constitutes a treatment of personal data, with respect to the

which the data controller must comply with the principle of legality

established in article 5.1 of the RGPD, according to which personal data will be

“treated in a lawful, loyal and transparent manner in relation to the interested party (legality,

loyalty and transparency).

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Article 6.1 of the RGPD establishes the assumptions that allow the legalization of the

processing of personal data:

"1. The treatment will only be lawful if at least one of the following conditions is met:

a) the interested party gave his consent for the treatment of his personal data for one or

various specific purposes;

b) the treatment is necessary for the execution of a contract in which the interested party is a party

or for the application at the request of the latter of pre-contractual measures;

c) the treatment is necessary for the fulfillment of a legal obligation applicable to the

data controller;

d) the processing is necessary to protect the vital interests of the data subject or another person physical;

e) the treatment is necessary for the fulfillment of a mission carried out in the public interest or in the exercise of public powers conferred on the data controller;

f) the treatment is necessary for the satisfaction of legitimate interests pursued by the responsible for the treatment or by a third party, provided that said interests are not prevail the interests or the fundamental rights and freedoms of the interested party that require the protection of personal data, in particular when the interested party is a child.

The provisions of letter f) of the first paragraph shall not apply to the treatment carried out by public authorities in the exercise of their functions.

IV

In accordance with the evidence available at the present time of agreement to initiate the sanctioning procedure, and without prejudice to what results from the instruction, there are indications about the processing of the personal data of the party claimant without any legal basis that legitimizes it, considering that it requested the the party claimed the deletion of their personal data.

This obligation to delete personal data entails the impossibility of any further processing of such data. Despite this, the defendant used the e-mail address of the complaining party to send him some informative emails about their activities, which are outlined in the Antecedent First.

The FAC-USO entity itself has admitted the aforementioned circumstance.

The known facts could constitute an infringement, attributable to the party claimed, for violation of the provisions of article 6 of the RGPD, typified in the section 5.a) of article 83 of the RGPD, which under the heading "General conditions

for the imposition of administrative fines” provides the following:

"5. Violations of the following provisions will be sanctioned, in accordance with the section 2, with administrative fines of a maximum of EUR 20,000,000 or, in the case of a company, of an amount equivalent to a maximum of 4% of the total annual turnover of the previous financial year, opting for the highest amount:

a) the basic principles for the treatment, including the conditions for the consent to tenor of articles 5, 6, 7 and 9”.

In this regard, the LOPDGDD, in its article 71 establishes that "They constitute

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infractions the acts and behaviors referred to in sections 4, 5 and 6 of the Article 83 of Regulation (EU) 2016/679, as well as those that are contrary to the present organic law”.

For the purposes of the limitation period, article 72 of the LOPDGDD indicates:

“Article 72. Infractions considered very serious.

1. Based on the provisions of article 83.5 of Regulation (EU) 2016/679, they are considered very serious and will prescribe after three years the infractions that suppose a violation substance of the articles mentioned therein and, in particular, the following:

(...)

b) The processing of personal data without the concurrence of any of the conditions of legality of the treatment established in article 6 of Regulation (EU) 2016/679”.

v

It is appropriate to graduate the sanction to be imposed in accordance with the criteria established by the

articles 83.2 of the RGPD and 76 of the LOPDGDD.

In accordance with the precepts indicated, and without prejudice to what results from the instruction of the procedure, in the present case it is considered that it is appropriate to graduate the sanction to be imposed according to the following criteria:

In an initial evaluation, the criterion of next graduation:

. Article 83.2.b) of the RGPD: "b) the intention or negligence in the infringement".

The negligence appreciated in the commission of the infraction, considering that the claimed party did not take into account the right of suppression exercised, and neither the subsequent warnings that were made by the claimant.

These circumstances reveal the negligent action of the party claimed.

In this regard, what was declared in the Judgment of the High Court is taken into account.

National of 10/17/2007 (rec. 63/2006) that, based on the fact that they are entities whose activity involves continuous data processing, indicates that "... the The Supreme Court has understood that there is imprudence whenever disregards a legal duty of care, that is, when the offender fails to behave with due diligence."

It is an entity that performs personal data processing in a systematic and continuous in the workplace and that extreme care must be taken in the compliance with its data protection obligations.

This Agency understands that diligence must be deduced from facts conclusive, duly accredited and directly related with the elements that make up the infraction, in such a way that it can be deduced that it has occurred despite all the means provided by the responsible to avoid it. In this case, the action of the party complained against

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has this character.

It is also considered that the following circumstance concurs as a mitigating circumstance:

. Article 83.2.a) of the RGPD: “a) the nature, seriousness and duration of the infringement, taking into account the nature, scope or purpose of the operation of treatment in question as well as the number of interested parties affected and the level of damages they have suffered.

The infringement affects only the claimed party.

Considering the exposed factors, the initial valuation that reaches the fine, for the violation of article 6 of the RGPD, is 3,000 euros (three thousand euros).

SAW

If the infraction is confirmed, it could be agreed to impose on the person responsible the adoption of appropriate measures to adjust their actions to the regulations mentioned in this act, in accordance with the provisions of the aforementioned article 58.2 d) of the RGPD, according to the which each control authority may “order the person in charge or in charge of the treatment that the treatment operations comply with the provisions of the this Regulation, where appropriate, in a certain way and within a specified period...”. The imposition of this measure is compatible with the sanction consisting of an administrative fine, as provided in art. 83.2 of the GDPR.

It is warned that not meeting the requirements of this organization may be considered as an administrative offense in accordance with the provisions of the RGPD, typified as an infraction in its article 83.5 and 83.6, being able to motivate such conduct the

opening of a subsequent sanctioning administrative proceeding.

Therefore, in accordance with the foregoing, by the Director of the Agency

Spanish Data Protection,

HE REMEMBERS:

FIRST: START A SANCTION PROCEDURE against the FEDERATION OF

ATTENTION TO THE CITIZENSHIP OF THE WORKERS' UNION UNION (FAC-USO), with

NIF ***NIF.1, for the alleged infringement of article 6 of the RGPD, typified in article

83.5.a) of the same legal text.

SECOND: APPOINT B.B.B. and, as secretary, to C.C.C.,

indicating that any of them may be challenged, as the case may be, in accordance with

established in articles 23 and 24 of Law 40/2015, of October 1, on the Regime

Legal Department of the Public Sector (LRJSP).

THIRD: INCORPORATE to the disciplinary file, for evidentiary purposes, the

claim filed by the claimant and its documentation, as well as the

documents obtained and generated by the Subdirector General for Inspection of

Data in the actions prior to the start of this sanctioning procedure.

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FOURTH: THAT for the purposes provided in art. 64.2 b) of Law 39/2015, of 1

October, of the Common Administrative Procedure of the Public Administrations, the

sanction that could correspond would be 3,000 euros (three thousand euros), without prejudice

of what results from the instruction.

Likewise, the imputed infraction, if confirmed, may lead to the imposition of

measures in accordance with the provisions of the aforementioned article 58.2 d) of the RGPD.

FIFTH: NOTIFY this agreement to the FEDERATION OF ATTENTION TO THE CITIZENSHIP OF THE WORKERS' UNION (FAC-USO), granting it a term hearing of ten business days to formulate the allegations and present the tests you deem appropriate. In your statement of arguments, you must provide your NIF and the procedure number that appears in the heading of this document.

If within the stipulated period it does not make allegations to this initial agreement, the same may be considered a resolution proposal, as established in article 64.2.f) of Law 39/2015, of October 1, of the Common Administrative Procedure of Public Administrations (hereinafter, LPACAP).

In accordance with the provisions of article 85 of the LPACAP, you may recognize your responsibility within the term granted for the formulation of allegations to the this initiation agreement; which will entail a reduction of 20% of the sanction to be imposed in this proceeding. With the application of this reduction, the penalty would be established at 2,400 euros (two thousand four hundred euros), resolving the procedure with the imposition of this sanction.

Similarly, you may, at any time prior to the resolution of this procedure, carry out the voluntary payment of the proposed sanction, which will mean a reduction of 20% of its amount. With the application of this reduction, the penalty would be established at 2,400 euros (two thousand four hundred euros) and its payment will imply the termination of the procedure.

The reduction for the voluntary payment of the penalty is cumulative with the corresponding apply for the acknowledgment of responsibility, provided that this acknowledgment of the responsibility is revealed within the period granted to formulate arguments at the opening of the procedure. The voluntary payment of the referred amount

in the previous paragraph may be done at any time prior to the resolution. In

In this case, if it were appropriate to apply both reductions, the amount of the penalty would be set at 1,800 euros (one thousand eight hundred euros).

In any case, the effectiveness of any of the two reductions mentioned will be conditioned to the abandonment or renunciation of any action or resource in via administrative against the sanction.

In case you chose to proceed to the voluntary payment of any of the amounts indicated above (2,400 euros or 1,800 euros), you must make it effective by depositing it in account number ES00 0000 0000 0000 0000 0000 open to name of the Spanish Agency for Data Protection in the bank

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CAIXABANK, S.A., indicating in the concept the reference number of the procedure that appears in the heading of this document and the cause of reduction of the amount to which it is accepted.

Likewise, you must send proof of payment to the General Subdirectorate of Inspection to proceed with the procedure in accordance with the quantity entered.

The procedure will have a maximum duration of nine months from the date of the start-up agreement or, where appropriate, of the draft start-up agreement.

Once this period has elapsed, it will expire and, consequently, the file of performances; in accordance with the provisions of article 64 of the LOPDGDD.

In compliance with articles 14, 41 and 43 of the LPACAP, it is noted that, in what

successively, the notifications sent to you will be made exclusively in a electronically by appearance at the electronic headquarters of the General Access Point of the Administration or through the unique Authorized Electronic Address and that, if not access them, their rejection will be recorded in the file, considering the processing and following the procedure. You are informed that you can identify before this Agency an email address to receive the notice of commissioning disposition of the notifications and that the lack of practice of this notice will not prevent that the notification be considered fully valid.

Finally, it is pointed out that in accordance with the provisions of article 112.1 of the LPACAP, there is no administrative appeal against this act.

Sea Spain Marti

Director of the Spanish Data Protection Agency

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SECOND: On July 26, 2022, the claimed party has proceeded to pay the sanction in the amount of 1800 euros making use of the two reductions provided in the Startup Agreement transcribed above, which implies the recognition of the responsibility.

THIRD: The payment made, within the period granted to formulate allegations to the opening of the procedure, entails the waiver of any action or resource in via administrative action against the sanction and acknowledgment of responsibility in relation to the facts referred to in the Initiation Agreement.

FOUNDATIONS OF LAW

Yo

In accordance with the powers that article 58.2 of Regulation (EU) 2016/679

(General Data Protection Regulation, hereinafter RGPD), grants each

control authority and as established in articles 47, 48.1, 64.2 and 68.1 of the

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Organic Law 3/2018, of December 5, on the Protection of Personal Data and

guarantee of digital rights (hereinafter, LOPDGDD), is competent to

initiate and resolve this procedure the Director of the Spanish Protection Agency

of data.

Likewise, article 63.2 of the LOPDGDD determines that: "The procedures

processed by the Spanish Agency for Data Protection will be governed by the provisions

in Regulation (EU) 2016/679, in this organic law, by the provisions

regulations issued in its development and, as long as they do not contradict them, with a

subsidiary, by the general rules on administrative procedures."

II

Article 85 of Law 39/2015, of October 1, on Administrative Procedure

Common to Public Administrations (hereinafter, LPACAP), under the rubric

"Termination in sanctioning procedures" provides the following:

"1. Started a sanctioning procedure, if the offender acknowledges his responsibility,

the procedure may be resolved with the imposition of the appropriate sanction.

2. When the sanction is solely pecuniary in nature or it is possible to impose a

pecuniary sanction and another of a non-pecuniary nature, but the

inadmissibility of the second, the voluntary payment by the alleged perpetrator, in

any time prior to the resolution, will imply the termination of the procedure,

except in relation to the replacement of the altered situation or the determination of the

compensation for damages caused by the commission of the infringement.

3. In both cases, when the sanction is solely pecuniary in nature, the competent body to resolve the procedure will apply reductions of, at least, 20% of the amount of the proposed sanction, these being cumulative with each other.

The aforementioned reductions must be determined in the notification of initiation of the procedure and its effectiveness will be conditioned to the withdrawal or resignation of any administrative action or recourse against the sanction.

The reduction percentage provided for in this section may be increased regulations."

According to what was stated,

the Director of the Spanish Data Protection Agency RESOLVES:

FIRST: TO DECLARE the termination of procedure EXP202207225, of in accordance with the provisions of article 85 of the LPACAP.

SECOND: NOTIFY this resolution to the FEDERATION OF ATTENTION TO THE CITIZENSHIP OF THE WORKERS' UNION (FAC-USO).

In accordance with the provisions of article 50 of the LOPDGDD, this

Resolution will be made public once it has been notified to the interested parties.

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Against this resolution, which puts an end to the administrative procedure as prescribed by the art. 114.1.c) of Law 39/2015, of October 1, on Administrative Procedure

Common of the Public Administrations, the interested parties may file an appeal contentious-administrative before the Contentious-administrative Chamber of the

National Court, in accordance with the provisions of article 25 and section 5 of the fourth additional provision of Law 29/1998, of July 13, regulating the Contentious-Administrative Jurisdiction, within a period of two months from the day following the notification of this act, as provided in article 46.1 of the aforementioned Law.

Sea Spain Marti

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