

□ File No.: EXP202206983

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 September 26, 2022, the Director of the Spanish Agency
of Data Protection agreed to start a sanctioning procedure against ALI MARKET (in
hereinafter, the claimed party), through the Transcribed Agreement:

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File No.: EXP202206983

AGREEMENT TO START THE SANCTION PROCEDURE

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

FACTS

FIRST: On 06/20/2022, the CIVIL GUARD - POST

*** LOCATION.1 (hereinafter, the complaining party) sent three Reports-Complaints for
a possible breach of the provisions of the data protection regulations of
personal character by ALI MARKET with NIF Y1834984N (hereinafter, the
denounced party).

The letter of remittance indicates the following:

“At 11:45 a.m. on June 13, 2022, the Patrol of the COMPAÑÍA DE

***LOCATION.2 AND POSITION OF ***LOCATION.2,
inspection

Prosecutor/Administrative in ALI MARKET Food Store (...), an Act is issued

Complaint by:

makes

- Not having at least one badge or poster in the video surveillance area

information in a sufficiently visible place.

- Not having printed materials available to interested parties detailing the

information provided for in articles 15 to 22 of the GDPR, or where to obtain

More information on the processing of personal data.

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Having a video surveillance device in use, and not accrediting the obligation to

have the Record of Treatment Activities.”

SECOND: The denounced party had been sent a letter indicating the

obligations it had in terms of data protection and video surveillance, resulting

notified on 05/07/2022, before the submission of three Records-Complaints of the

CIVIL GUARD - POST OF ***LOCATION.1 for the same facts.

FUNDAMENTALS OF LAW

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Competence

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

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

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

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 Data Protection Agency will be governed by the provisions in Regulation (EU) 2016/679, in this organic law, by the provisions regulations dictated in its development and, insofar as they do not contradict them, with character subsidiary, by the general rules on administrative procedures."

II

The image is a personal data

The physical image of a person, according to article 4.1 of the GDPR, is data personnel and their protection, therefore, is the subject of said Regulation. In article 4.2 of the GDPR defines the concept of "processing" of personal data.

The images generated by a system of cameras or camcorders are data of personal nature, so its treatment is subject to the protection regulations of data.

It is, therefore, pertinent to analyze whether the processing of personal data (image of the natural persons) carried out through the denounced video surveillance system is in accordance with the provisions of the GDPR.

II

alleged infringement

Article 6.1 of the GDPR establishes the assumptions that allow the use of processing of personal data.

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Regarding treatment for video surveillance purposes, article 22 of the LOPDGDD establishes that natural or legal persons, public or private, may carry out carry out the treatment of images through systems of cameras or video cameras in order to preserve the safety of people and property, as well as their facilities.

Article 12.1 of the GDPR indicates that whoever carries out data processing personal, such as the capture of images through a system of video surveillance, must provide the interested parties with the information indicated in the Articles 13 and 14 of the GDPR.

In order that the duty of information provided for in article 12 of the GDPR is complies in a concise and understandable manner for the affected party, the aforementioned article 22 of the LOPDGDD foresees in relation to video surveillance a system of "information by layers".

In this sense, the first layer must refer, at least, to the existence of the treatment (video surveillance), the identity of the person responsible, the possibility of exercising the rights provided for in articles 15 to 22 of the GDPR and where to obtain more information on the processing of personal data.

Second layer information should be easily available in one place accessible to the affected person, whether it is an information sheet at a reception, cashier, etc..., placed in a visible public space or in a web address, and must refer to the other elements of article 13 of the GDPR.

It is not necessary to specify the precise location of the video surveillance equipment.

This duty of information will be understood fulfilled by placing a Information device in a sufficiently visible place, and at least, at the entrances

to monitored areas, whether interior or exterior. In case the space
video surveillance has several accesses must have said hallmark of
video surveillance area in each of them.

This information must be provided in advance -recital 39 of the GDPR-. He

The aim is to make the context of surveillance clear.

Video surveillance obligations

IV.

In accordance with the foregoing, the processing of images through a system
video surveillance, to comply with current regulations, must comply with the
following requirements:

1.- Individuals or legal entities, public or private, can establish a system
video surveillance in order to preserve the safety of people and property,
as well as its facilities.

It must be assessed whether the intended purpose can be achieved in another less
intrusive to the rights and freedoms of citizens. Personal data only

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should be processed if the purpose of the processing cannot reasonably be achieved by
other means, recital 39 of the GDPR.

2.- The images obtained cannot be used for a subsequent purpose
incompatible with the one that motivated the installation of the video surveillance system.

3.- The duty to inform those affected provided for in articles 12 must be fulfilled
and 13 of the GDPR, and 22 of the LOPDGDD, in the terms already indicated.

4.- Images of the public thoroughfare cannot be captured, since the treatment of images in public places, unless there is government authorization, only It can be carried out by the Security Forces and Bodies.

On some occasions, for the protection of private spaces, where cameras installed on facades or inside, may be necessary to ensure the security purpose the recording of a portion of the public thoroughfare.

That is, cameras and camcorders installed for security purposes may not be obtain images of public roads unless it is essential for said purpose, or it is impossible to avoid it due to their location. And in such a case extraordinary, the cameras will only be able to capture the minimum portion necessary to preserve the safety of people and property, as well as its facilities.

Installed cameras cannot get images from third-party proprietary space and/or public space without duly accredited justified cause, nor can they affect the privacy of passers-by who move freely through the area.

It is not allowed, therefore, the placement of cameras towards the private property of neighbors with the purpose of intimidating them or affecting their private sphere without cause justified.

In no case will the use of surveillance practices beyond the environment be admitted. object of the installation and in particular, not being able to affect public spaces surroundings, adjoining buildings and vehicles other than those that access the space guarded.

Images cannot be captured or recorded in spaces owned by third parties without the consent of their owners, or, where appropriate, of the people who are in them find.

It is disproportionate to capture images in private spaces, such as changing rooms, lockers or rest areas for workers.

5.- The images may be kept for a maximum period of one month, except in those cases in which they must be kept to prove the commission of acts that threaten the integrity of people, property or facilities.

In this second case, they must be made available to the authority competent authority within a maximum period of 72 hours from the knowledge of the recording existence.

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6.- The controller must keep a record of processing activities carried out under his responsibility in which the information to which he makes reference article 30.1 of the GDPR.

7.- The person in charge must carry out a risk analysis or, where appropriate, an evaluation of impact on data protection, to detect those derived from the implementation of the video surveillance system, assess them and, where appropriate, adopt security measures. appropriate security.

8.- When a security breach occurs that affects the processing of cameras for security purposes, whenever there is a risk to the rights and freedoms of natural persons, you must notify the AEPD within a maximum period of 72 hours.

A security breach is understood to be the destruction, loss or accidental alteration or unlawful transfer of personal data, stored or otherwise processed, or the communication or unauthorized access to said data.

9.- When the system is connected to an alarm center, it can only be

installed by a qualified private security company

contemplated in article 5 of Law 5/2014 on Private Security, of April 4.

The Spanish Data Protection Agency offers through its website

[<https://www.aepd.es>] access to:

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the legislation on the protection of personal data, including the

RGPD and the LOPDGDD (section "Reports and resolutions" / "regulations"),

the Guide on the use of video cameras for security and other purposes,

the Guide for compliance with the duty to inform (both available at the

section "Guides and tools").

It is also of interest, in case of carrying out low-risk data processing, the

free tool Facilitates (in the "Guides and tools" section) that, through

specific questions, allows to assess the situation of the person in charge with respect to the

processing of personal data that it carries out, and where appropriate, generate various

documents, informative and contractual clauses, as well as an annex with measures

indicative security considered minimum.

Possible administrative offense

V

The Records-Complaints are based on the lack of an informative poster of a video-surveilled area

in the ALI MARKET establishment, located at ***ADDRESS.1, and if you do not have

available to customers the rest of the information referred to in the GDPR.

It is also made clear that it does not have a Record of Activities of

Treatment.

Thus, the evidence available at this stage of the procedure

disciplinary action, without prejudice to what results from the investigation of the file,

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constitute solid indications that the denounced party, having cameras installed video surveillance in the establishment, lacks a poster with all the information which, mandatory, must appear in it. It does not have the rest of the information listed in the aforementioned precept that must be provided to its clients, if they request it, as well as well as the corresponding Registry of Treatment Activities.

The conduct of the denounced party violates the obligation imposed by article 13 and 30 of the GDPR, so such conduct could constitute both infractions typified in articles 83.5.b) and 83.4.a) of the GDPR.

With respect to the first of the infractions, the aforementioned precept establishes what following:

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

to)

(...)

a) The rights of the interested parties in accordance with articles 12 to 22;

(...)

For mere prescription purposes, article 72.1.h) of the LOPDGDD qualifies as very serious “The omission of the duty to inform the affected party about the treatment of their

personal data in accordance with the provisions of articles 13 and 14 of the Regulation (UE) 2016/679 and 12 of this Organic Law". The limitation period for infringements very serious cases provided for in Organic Law 3/2018 is three years.

For its part, the infringement of article 30 of the GDPR, typified in article 83.4.a) of the GDPR states that "Violations of the following provisions will be penalized, in accordance with section 2, with administrative fines of EUR 10,000,000 as maximum or, in the case of a company, of an amount equivalent to 2% as maximum of the overall annual total turnover of the previous financial year, opting for the highest amount:

a) the obligations of the controller and the person in charge under articles 8, 11, 25 to 39, 42 and 43;
(...)"

For the purposes of the limitation period, article 73.n) of the GDPR qualifies as serious "No have the record of processing activities established in article 30 of the Regulation (EU) 2016/679." The limitation period for serious infringements provided for in Organic Law 3/2018 is two years.

SAW

Sanction proposal

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The corrective powers available to the Spanish Agency for the Protection of data, as a control authority, are established in article 58.2 of the GDPR. Between they have the power to impose an administrative fine in accordance with the

article 83 of the GDPR -article 58.2 i)-, or the power to order the person responsible or processor that the processing operations comply with the provisions of the GDPR, where applicable, in a certain way and within a certain specified term -article 58. 2 d)-.

According to the provisions of article 83.2 of the GDPR, the measure provided for in article 58.2 d) of the aforementioned Regulation is compatible with the sanction consisting of a fine administrative.

In the present case, taking into account the facts exposed and without prejudice to what resulting from the investigation of the procedure, it is considered that the sanctions that would correspond to impose are an administrative fine. The fines imposed must be, in each individual case, effective, proportionate and dissuasive, in accordance with with article 83.1 of the GDPR. In order to determine the administrative fines to impose, the provisions of article 83.2 of the GDPR must be observed, which indicates:

"2. Administrative fines will be imposed, depending on the circumstances of each individual case, in addition to or in lieu of the measures contemplated in Article 58, paragraph 2, letters a) to h) and j). When deciding to impose a fine administration and its amount in each individual case shall be duly taken into account:

a) the nature, seriousness and duration of the offence, taking into account the nature, scope or purpose of the processing operation in question, as well as such as the number of interested parties affected and the level of damages that have suffered;

b) intentionality or negligence in the infraction;

c) any measure taken by the controller or processor to alleviate the damages and losses suffered by the interested parties;

d) the degree of responsibility of the controller or processor, taking into account the technical or organizational measures that they have applied under

of articles 25 and 32;

e) any previous infringement committed by the controller or processor;

f) the degree of cooperation with the supervisory authority in order to remedy the infringement and mitigate the possible adverse effects of the infringement;

g) the categories of personal data affected by the infringement;

h) the way in which the supervisory authority became aware of the infringement, in

particular whether the person in charge or the person in charge notified the infringement and, if so, in what extent;

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i) when the measures indicated in article 58, paragraph 2, have been ordered previously against the person in charge or the person in charge in relation to the same matter, compliance with said measures;

j) adherence to codes of conduct under article 40 or to mechanisms of certification approved in accordance with article 42,

k) any other aggravating or mitigating factor applicable to the circumstances of the case, such as financial benefits obtained or losses avoided, directly or indirectly, through the infringement”.

For its part, in relation to letter k) of article 83.2 of the GDPR, the LOPDGDD, in its article 76, "Sanctions and corrective measures", provides:

"1. The sanctions provided for in sections 4, 5 and 6 of article 83 of the Regulation (UE) 2016/679 will be applied taking into account the graduation criteria established in section 2 of said article.

2. In accordance with the provisions of article 83.2.k) of Regulation (EU) 2016/679

may also be taken into account:

- a) The continuing nature of the offence.
- b) The link between the activity of the offender and the performance of data processing.
personal information.
- c) The benefits obtained as a consequence of the commission of the infraction.
- d) The possibility that the conduct of the affected party could have included the commission
of the offence.
- e) The existence of a merger by absorption process subsequent to the commission of the
infringement, which cannot be attributed to the absorbing entity
- f) Affectation of the rights of minors
- g) Have, when it is not mandatory, a data protection delegate.
- h) Submission by the person responsible or in charge, on a voluntary basis, to
alternative conflict resolution mechanisms, in those cases in which
there are controversies between those and any interested party”.

Regarding the infringement of article 13 of the GDPR, typified in article 83.5.b) of the
GDPR, the balance of the circumstances contemplated allows to establish as valuation
initial fine of €400 (four hundred euros). On the other hand, if the
violation of article 30 of the GDPR, typified in article 83.4.a) of the GDPR,
It would be appropriate to initially set a fine of €200 (two hundred euros).

VII

possible measures

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If the infringements are confirmed, it could be agreed to impose the adoption on the person responsible appropriate measures to adjust its performance to the regulations mentioned in this act, in accordance with the provisions of the aforementioned article 58.2 d) of the GDPR, according to the which each control authority may "order the person responsible or in charge of the processing that the processing operations comply with the provisions of the this Regulation, where appropriate, in a certain way and within a certain specified term...".

In such a case, in the resolution adopted, this Agency may require the responsible so that within the period to be determined:

- Accredited having proceeded to the placement of the informative badge in the areas video surveillance (at least the existence of a treatment must be identified, the identity of the person responsible and the possibility of exercising the rights provided in said precepts), locating this device in a place sufficiently visible, both in open and closed spaces.
- Evidence that the information to which it is refer to articles 13 and 14 of the GDPR.
- Proof of having the proper Record of Treatment Activities.

It is noted that not meeting the requirements of this body may be considered as an administrative offense in accordance with the provisions of the GDPR, classified as an infraction in its article 83.5 and 83.6, being able to motivate such conduct the opening of a subsequent administrative sanctioning procedure.

Therefore, in accordance with the foregoing, by the Director of the Agency Spanish Data Protection,

VIII

Conclusion

HE REMEMBERS:

FIRST: INITIATE SANCTION PROCEDURE against ALI MARKET, with NIF

Y1834984N, for the alleged infringements of articles 13 and 30 of the GDPR, classified as given in articles 83.5.b) and 83.4.a) of the GDPR.

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

October, of the Common Administrative Procedure of Public Administrations

(LPACAP, hereinafter), the sanctions that may correspond would be €400

(four hundred euros) and €200 (two hundred euros), respectively, without prejudice to the resulting from the instruction.

Likewise, the imputed infractions, if confirmed, may lead to the imposition

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

THIRD: APPOINT as instructor R.R.R. and, as secretary, to S.S.S.,

indicating that any of them may be challenged, if applicable, in accordance with the

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

Legal Department of the Public Sector (LRJSP).

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FOURTH: INCORPORATE into the disciplinary file, for evidentiary purposes, the three

Records-Complaints filed, as well as the documents obtained and generated by the

General Sub-Directorate of Data Inspection in actions carried out with

prior to the initiation of this disciplinary proceeding.

FIFTH: NOTIFY this agreement to ALI MARKET, with NIF Y1834984N,

granting him a hearing period of ten business days to formulate the

allegations and present the evidence it deems appropriate. In his writing of allegations must provide your NIF and the procedure number that appears in the heading of this document

If, within the stipulated period, he 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, on 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 period granted for the formulation of allegations to the present initiation agreement, which will entail a reduction of 20% of the sanctions that should be imposed in this procedure. With the application of this reduction, the penalty would be set at €320 (three hundred and twenty euros) for the violation of article 13 of the GDPR, and €160 (one hundred and sixty euros) for the violation of article 30 of the GDPR, €480 (four hundred and eighty euros) in total, resolving the procedure with the imposition of this sanction.

In the same way, it 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 sanctions would be established at €320 (three hundred and twenty euros) for the infringement of article 13 of the GDPR, and €160 (one hundred and sixty euros) for the infringement of article 30 of the GDPR, €480 (four hundred and eighty euros) in total, and its payment will imply the termination of the procedure.

The reduction for the voluntary payment of the penalty is cumulative to the corresponding apply for acknowledgment of responsibility, provided that this acknowledgment of the responsibility is revealed within the period granted to formulate allegations at the opening of the procedure. 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 both reductions were to be applied, the amount of the penalty would remain established at €240 (two hundred and forty euros) for the violation of article 13 of the GDPR and €120 (one hundred and twenty euros) for that of article 30 of the GDPR, €360 (three hundred and sixty euros) in total.

In any case, the effectiveness of any of the two aforementioned reductions will be conditioned to the withdrawal or resignation of any action or appeal via administrative against the sanction.

In the event that you choose to proceed with the voluntary payment of any of the amounts indicated above, you must make it effective by depositing it into account no.

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ES00 0000 0000 0000 0000 0000 opened in the name of the Spanish Agency for Protection of Data in the banking entity CAIXABANK, S.A., indicating in the concept the reference number of the procedure that appears in the heading of this document and the reason for the reduction of the amount to which it accepts.

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

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

After this period, its expiration will occur and, consequently, the file of performances; in accordance with the provisions of article 64 of the LOPDGDD.

Finally, it is noted that in accordance with the provisions of article 112.1 of the

LPACAP, there is no administrative appeal against this act.

Mar Spain Marti

Director of the Spanish Data Protection Agency

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SECOND: On October 15, 2022, the claimed party has proceeded to pay of the sanction in the amount of 360 euros making use of the two reductions provided for in the initiation Agreement transcribed above, which implies the recognition of 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 appeal via against the sanction and acknowledgment of responsibility in relation to the facts referred to in the Commencement Agreement.

FOURTH: In the previously transcribed initiation agreement, it was indicated that, if Once the infringement is confirmed, it could be agreed to impose on the controller the adoption of adequate measures to adjust its performance to the regulations mentioned in this act, in accordance with the provisions of the aforementioned article 58.2 d) of the GDPR, according to the which each control authority may "order the person responsible or in charge of the processing that the processing operations comply with the provisions of the this Regulation, where appropriate, in a certain way and within a certain specified term...".

Having recognized the responsibility for the infringement, the imposition of the measures included in the Initiation Agreement.

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Competence

In accordance with the powers that article 58.2 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter GDPR), grants each control authority and as established in articles 47, 48.1, 64.2 and 68.1 of the 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 Data Protection Agency will be governed by the provisions in Regulation (EU) 2016/679, in this organic law, by the provisions regulations dictated in its development and, insofar as they do not contradict them, with character subsidiary, by the general rules on administrative procedures."

II

Termination of the procedure

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

Common for Public Administrations (hereinafter, LPACAP), under the heading

"Termination in disciplinary proceedings" provides the following:

"1. Initiated a disciplinary procedure, if the offender acknowledges his responsibility,

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

2. When the sanction has only a pecuniary 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 presumed perpetrator, in any moment 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 offence.

3. In both cases, when the sanction is solely pecuniary in nature, the

The competent body to resolve the procedure will apply reductions of at least 20% of the amount of the proposed penalty, these being cumulative among themselves.

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 resource against the sanction.

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

According to what has been stated,

the Director of the Spanish Data Protection Agency RESOLVES:

FIRST: DECLARE the termination of procedure EXP202206983, in accordance with the provisions of article 85 of the LPACAP.

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SECOND: ORDER ALI MARKET to notify the

Agency adopting the measures described in the fundamentals of law of the Initiation Agreement transcribed in this resolution.

THIRD: NOTIFY this resolution to ALI MARKET.

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

Resolution will be made public once the interested parties have been notified.

Against this resolution, which puts an end to the administrative process as prescribed by

the art. 114.1.c) of Law 39/2015, of October 1, on Administrative Procedure

Common of Public Administrations, interested parties may file an appeal

administrative litigation before the Administrative Litigation 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 for in article 46.1 of the

referred Law.

Mar Spain Marti

Director of the Spanish Data Protection Agency

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