

□ File No.: EXP202101826

## 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 August 8, 2022, the Director of the Spanish Agency for  
Data Protection agreed to initiate sanction proceedings against EUROPYMES  
INTEGRAL SERVICES S.L. (hereinafter, the claimed party), through the  
Agreement transcribed:

<<

Procedure No.: PS/00138/2022

IMI Reference: A56ID 322069- A60IC 394915- A60DD 411333- Case Register  
357086

### 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: A.A.A. (hereinafter, the claimant) filed a claim, dated  
March 23, 2021, before the Irish data protection authority (Data  
Protection Commission). The claim is directed against EUROPYMES SERVICIOS  
INTEGRALES, S.L. (hereinafter, EUROPYMES) with NIF B83247627. The reasons in  
on which the claim is based are as follows:

The complaining party states that they have requested the cancellation of their account and the deletion of  
your personal data from the "NOBUNA" service, belonging to EUROPYMES, request

which was reiterated through several emails, since EUROPYMES does not heeded his request. Once the account was finally terminated, the party claimant has received a product update notification email again acquired from EUROPYMES.

Relevant documentation provided by the claimant:

- Copy of a series of emails from August 19 and 20, 2020 between emails \*\*\*EMAIL.1 (hereinafter, email of the complaining party) and \*\*\*EMAIL.2 (hereinafter, NOBUNA's email) that serves for the complaining party to

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request the deletion of your data and identify the email of the complaining party as the mind you have to delete it.

- Copy of mail, dated August 21, 2020, sent from the email of NOBUNA indicating that the claimant's account has already been deleted.

- Copy of mail, dated August 24, 2020, sent from the email of NOBUNA in which the claimant is answered (which previously indicated that still able to access your account) that your account remains active for 30 days and, if in those days you do not access, it will be deleted; but, if you access the account, that account will be canceled account deletion request.

- Copy of a series of emails between the email of NOBUNA and that of the complaining party dated November 13, 2020. In it, the complaining party indicates that,

Even though you have requested deletion of your account in August, you are still receiving notifications from NOBUNA and you can still log into your NOBUNA account; and the

complaining party requests that his account and all the data that NOBUNA has be deleted about his person.

- Copy of an email exchange, dated between November 20 and 23,

2020, in which, from the email of the complaining party, it is confirmed that the party claimant can no longer access their NOBUNA account.

- Copy of email sent from the email of the complaining party to the email of NOBUNA, dated February 21, 2021, in which you indicate that you have received a communication NOBUNA commercial about a plugin.

- Copy of the response email to the claimant, sent from the email of NOBUNA on February 23, 2021. In this email, we apologize to the party complainant and it is indicated that they have carried out verifications and hope that this does not happen again. After this email, the complaining party sends another email requesting confirmation of the deletion of your data, which receives a confirmation from the email of NOBUNA.

- Copy of email sent from the email of the complaining party on March 23, 2021 in which he indicates that he has received another update mail from NOBUNA.

The reply to this email is also sent from NOBUNA's email indicating to ignore this communication and that your data has already been deleted.

SECOND: Through the "Internal Market Information System" (hereinafter IMI System), regulated by Regulation (EU) No. 1024/2012, of the European Parliament and of the Council, of October 25, 2012 (IMI Regulation), whose objective is to favor cross-border administrative cooperation, mutual assistance between States members and the exchange of information, the aforementioned claim was transmitted on the 7th September 2021 and was given a registration date at the Spanish Agency of Data Protection (AEPD) on September 8, 2021. The transfer of this claim to the AEPD is made in accordance with the provisions of article 56

of Regulation (EU) 2016/679, of the European Parliament and of the Council, of

04/27/2016, regarding the Protection of Physical Persons with regard to the

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Processing of Personal Data and the Free Circulation of these Data (in the

hereinafter, GDPR), taking into account its cross-border nature and that this Agency

is competent to act as lead supervisory authority, given that

EUROPYMES has its registered office and sole establishment in Spain.

According to the information incorporated into the IMI System, in accordance with the

set out in article 60 of the GDPR, the Irish data protection authority

acts as an interested authority, in accordance with the provisions of article 4.22) letter

c) of the GDPR, as it is the supervisory authority before which the claim has been submitted.

claim, without other control authorities having declared themselves interested in

the present procedure.

THIRD: On November 2, 2021, in accordance with article 64.3 of

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

guarantee of digital rights (hereinafter, LOPDGDD), the

claim filed by the claimant.

FOURTH: The General Subdirectorate of Data Inspection proceeded to carry out

of previous investigative actions to clarify the facts in

matter, by virtue of the functions assigned to the control authorities in the

article 57.1 and of the powers granted in article 58.1 of the GDPR, and of

in accordance with the provisions of Title VII, Chapter I, Second Section, of the

LOPDGDD, having knowledge of the following extremes:

In response to a request for information formulated by this Agency, on

February 2022, EUROPYMES provides, among other things, the following information:

1. Indication that the data of NOBUNA users are processed on the basis

of legitimation of article 6.1.b) of the GDPR. Thus, the service offered

NOBUNA is the web distribution of WordPress and WooCommerce themes and plugins

that works under periodic subscription modality, and the emails

sent to the complaining party are part of this service.

2. Indication that NOBUNA does not send its users commercial communications

of any kind, any communication with the user being strictly limited to

the following assessed cases:

- Communications related to the registration or use of your NOBUNA account (see password recovery or login alert).

- Communications related to the management of your subscription and billing of the service.

- Communications related to the management of payment methods.

- Communications related to the renewal of the user's subscription.

- Communications related to wordpress template updates acquired.

3. Indication that the emails sent to the complaining party are not

commercial communications, if not that they are part of the service offered by

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NOBUNA, and that the email data of the complaining party was processed with the same purposes for which it was collected: "indicate the right products acquired that the acquired templates existed necessary updates of the product.". And a screenshot is provided with one of the communications addressed to the claiming party with the title "NOBUNA – A product you bought has been updated" (unofficial translation: "Nobuna – A product you have purchased has been updated"), whose content is as follows:

Hi AAA,

There is a new update for your product.

Beaver Themer WordPress Plugin 1.3.3

<https://www.nobuna.com/product/beaver-themer-wordpress-plugin/>

Log in to download it from your account now:

<https://www.nobuna.com/my-account/>

Any question or inconvenience, do not hesitate to contact us.

Best regards.

If you need to know more about our Plugins and themes, licenses and activation codes please read our FAQ.

We provide support during Mon-Fri and the average response time is 1 to 2 days.

Sometimes it can take more time if we get more support tickets, continuous holidays, etc

Nobuna – Premium WordPress Downloads

(unofficial translation:

"Hello A.A.A.,

There is a new update for your product

Beaver Beaver Themer WordPress Plugin 1.3.3

<https://www.nobuna.com/product/beaver-themer-wordpress-plugin/>

Sign in to download it from your account now:

<https://www.nobuna.com/my-account/>

If you have any questions or inconvenience, do not hesitate to contact us.

All the best.

If you need to know more about our Plugins and themes, licenses and codes of activation, please read our Frequently Asked Questions.

We provide support from Monday to Friday and response times are usually between 1 and 2 days. Sometimes the response can be delayed if we receive more incidents, long vacations etc.

Nobuna – WordPress Premium Downloads”)

4. Copy of the Privacy Policy and the Terms and Conditions of Use that are indicates that they were accepted by the complaining party at the time of registration and sign up for NOBUNA services. The Privacy Policy indicates what following regarding the types of data collected:

Reason for Collection: The data collected enables us to create your account and give you a unique and secure way of logging into your account

Use of Data Collected: We will use this data to:

- enable you to login securely to your account
- send you emails relating to your account and the Nobuna.com service including by way of example, onboarding emails, product updates, and notes:

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- This data is not shared with any third parties.
- If you do not wish to receive these emails please contact us.
- Nobuna.com account passwords are encrypted using Bcrypt; we do not store raw passwords.
- This data is processed and stored within France.

(Unofficial translation:

“Reason for collection: The data collected allows us to create your account and offer you a unique and secure way to access your account

Use of the data collected: We will use this data to:

- allow you to log into your account securely
- send you emails about your account and the Nobuna.com service, including, for example, welcome emails, product updates, and

Grades:

- These data are not shared with third parties.
- If you want to stop receiving these emails, please contact us.
- Nobuna.com account passwords are encrypted with Bcrypt; No we store passwords in the clear.
- These data are processed and stored in France.”)

5. Indication that the communications sent to the complaining party occurred due to a failure in the user account deletion system that, upon detecting that the complaining party's account had active templates and plugins for which updates existed, communications were automatically sent about those updates.

6. Indication that the system to unsubscribe users left the account blocked for 30 calendar days and, if the user accessed the account again during those 30 days, the account was reactivated; the part logins



claimant after requesting cancellation caused the reactivation of his account.

7. Indication that the deregistration system has been modified so that each user can

unsubscribe from your Control Panel immediately and definitively without

keep the account locked for 30 days; in such a way that the user no longer

You will not receive any communications, including communications about updates. AND

a screenshot of the Control Panel ("Dashboard") of a user is provided in

where the option "Remove your account with ALL YOUR DATA" appears (translation not

official: "Delete your account with ALL YOUR DATA").

8. Translation into Spanish of the communication that is intended to be sent

to the complaining party in English. It explains the reasons why

He kept receiving emails about updates and is told that, from his

claim, the process of deregistration and deletion of accounts has been modified.

user.

SIGNIFICANT EVIDENCE FOR THE GRADUATION OF THE SANCTION:

Duration of the possible infraction: We have evidence of three communications

(11/13/2020, 02/21/2021 and 03/23/2021) sent by the NOBUNA service after the

first confirmation of the deletion of the account on August 21, 2020.

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Linking the activity of EUROPYMES with the performance of treatment of

personal data: Legal person not used to data processing

personal.

Total annual global business volume: According to consultation carried out in

<https://monitoriza.axesor.es/> on February 7, 2022, the sales of EUROPYMES

SERVICIOS INTEGRALES SL were 165,485 euros and had 1 employee.

Recidivism due to the commission of infractions of the same nature as the facts in issue: There is no evidence that proceedings have been resolved for violations of EUROPYMES in the last year.

Financial benefits obtained or losses avoided through the events in question: They are not appreciated.

The conduct of the affected party could have led to the facts in question: They indicated to the complaining party that if he accessed his account within 30 days after having

If the cancellation is confirmed, the account will be reactivated, and from your emails, it is understood that tried to access your account shortly after you were confirmed unsubscribed. In any case, the complaining party subsequently complied with said requirement and neither produced the effective deregistration of the account.

The entity has diligently regularized the situation: From the NOBUNA service they tried to delete the complaining party's account, albeit to little avail.

FIFTH: On April 25, 2022, the Director of the AEPD signed a proposal draft decision to initiate disciplinary proceedings. following the process established in article 60 of the GDPR, on May 3, 2022 it was transmitted through of the IMI system this proposal for a draft decision as an informal consultation and informed the concerned authorities that they had four weeks from that time to comment

SIXTH: On June 15, 2022, the Director of the AEPD adopted a project decision to initiate disciplinary proceedings. Following the established process in article 60 of the GDPR, on June 21, 2022 it was transmitted through the system IMI this draft decision and the authorities concerned were informed that they had four weeks from that time to raise pertinent objections and

motivated. Within the term for this purpose, the control authorities concerned shall not presented pertinent and reasoned objections in this regard, for which reason it is considered that all authorities agree with said draft decision and are linked by it, in accordance with the provisions of section 6 of article 60 of the GDPR.

This draft decision was notified to EUROPYMES in accordance with the rules established in Law 39/2015, of October 1, on Administrative Procedure Common Public Administrations (LPACAP) on June 17, 2022, as It appears in the acknowledgment of receipt that is in the file.

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Competition and applicable regulations

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In accordance with the provisions of articles 58.2 and 60 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and the free circulation of these data (GDPR), and as established in articles 47, 48.1, 64.2 and 68.1 and 68.2 of Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights (hereinafter, LOPDGDD) is competent to initiate and resolve this procedure the Director of the Agency Spanish Data Protection.

Likewise, article 63.2 of the LOPDGDD determines that: "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

### Previous Questions

In the present case, in accordance with the provisions of article 4.1 of the GDPR, there is the processing of personal data, since EUROPYMES

carries out the collection of, among others, the following personal data of natural persons:

name, surname and email, among others. In addition, it is a treatment

cross-border, since EUROPYMES is established in Spain, although it provides

service to other countries of the European Union.

EUROPYMES carries out this activity in its capacity as data controller,

given that it is the one who determines the ends and means of such activity, by virtue of article 4.7 of the GDPR.

The GDPR provides, in its article 56.1, for cases of cross-border processing,

provided for in its article 4.23), in relation to the competence of the authority of

main control, that, without prejudice to the provisions of article 55, the authority of

control of the main establishment or of the only establishment of the person in charge or of the

The person in charge of the treatment will be competent to act as control authority

for the cross-border processing carried out by said controller or

commissioned in accordance with the procedure established in article 60. In the case

examined, as has been exposed, EUROPYMES has its only establishment in

Spain, so the Spanish Agency for Data Protection is competent to

act as the main supervisory authority.

For its part, article 17 of the GDPR regulates the right to obtain without undue delay of the person in charge of the treatment the deletion of the personal data that concern.

## II

### Right of erasure

Article 17 "Right of deletion" of the GDPR establishes:

"1. The interested party shall have the right to obtain without undue delay from the person responsible for the treatment the deletion of personal data that concerns you, which will be obliged to delete without undue delay the personal data when any of the following circumstances:

to)

the personal data is no longer necessary in relation to the purposes for which were collected or otherwise processed;

b) ..."

In the present case, the claimant registered with the NOBUNA service, belonging to EUROPYMES, on September 12, 2019. On August 18 of 2020, requested by email to the person responsible for the treatment the deletion of his account, who replied on August 21, 2020 that the account had been removed. However, that same day the complaining party communicates that its account is still open. On August 24, 2020, he once again requested the withdrawal of his account in NOBUNA, who that same day answers that the deletion of the complaining party's account if the complaining party does not access their account in a

period of thirty days. On November 13, 2020, the complaining party again receives a notification from NOBUNA regarding his account, so it had not been removed. On November 20, 2020, NOBUNA informs you that your account has been deleted. Subsequently, on February 21, 2021 and March 23 of 2021 the complaining party receives notifications in his email again from the NOBUNA service. On this last date, the claimant returns to communicate that your data has not been deleted, and that you have contacted the authority of data protection, to which the NOBUNA service replies to "ignore" the last notification sent to your email since your data has been deleted.

Therefore, according to the evidence available at this time agreement to initiate disciplinary proceedings, and without prejudice to what results from the instruction, it is considered that the known facts could constitute a infringement, attributable to EUROPYMES, for violation of article 17 of the GDPR.

Classification of the infringement of article 17 of the GDPR

IV.

If confirmed, the aforementioned infringement of article 17 of the GDPR could lead to the commission of the offenses typified in article 83.5 of the GDPR that under the

The heading "General conditions for the imposition of administrative fines" provides:

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Violations of the following provisions will be sanctioned, in accordance with the paragraph 2, with administrative fines of maximum EUR 20,000,000 or, in the case of a company, an amount equivalent to a maximum of 4% of the

total annual global business volume of the previous financial year, opting for the highest amount:

(...)

b) the rights of the interested parties in accordance with articles 12 to 22; (...)"

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

"The acts and behaviors referred to in sections 4,

5 and 6 of article 83 of Regulation (EU) 2016/679, as well as those that result contrary to this organic law".

For the purposes of the limitation period, article 72 "Infracciones considered very serious" of the LOPDGDD indicates:

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

(...)

k) The impediment or the obstruction or the repeated non-attention of the exercise of the rights established in articles 15 to 22 of Regulation (EU) 2016/679 (...)"

Penalty for violation of article 17 of the GDPR

V

For the purposes of deciding on the imposition of an administrative fine and its amount,

In accordance with the evidence available at the present time of

agreement to start disciplinary proceedings, and without prejudice to what results from the instruction, it is considered that the balance of the circumstances contemplated in the

Article 83.2 of the GDPR and 76.2 of the LOPDGDD, with respect to the offense committed

by violating the provisions of article 17 of the GDPR, it allows initially setting a

penalty of €1,000 (one thousand euros).

SAW

imposition of measures

If the infringement is confirmed, it could be agreed to impose on the person responsible the adoption of adequate measures to adjust its performance to the regulations mentioned in this act, without prejudice in accordance with the provisions of the aforementioned article 58.2 d) of the GDPR, according to which each control authority may "order the person responsible or processor that the processing operations comply with the provisions of this Regulation, where applicable, in a certain way and within a specified period...". The imposition of this measure is compatible with

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the sanction consisting of an administrative fine, according to the provisions of art. 83.2 of the GDPR.

Likewise, the measures that could be adopted in the resolution that puts an end to the procedure, in relation to the exercise of rights of the interested parties, will be application in all the countries of the European Union in which EUROPYMES operates.

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,



HE REMEMBERS:

FIRST: INITIATE SANCTION PROCEDURE for EUROPYMES SERVICES

INTEGRALES, S.L., with NIF B83247627, for the alleged violation of article 17 of the GDPR, typified in article 83.5 of the GDPR.

SECOND: 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).

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

documentation from IMI that has given rise to the previous actions of investigation, as well as the documents obtained and generated by the Subdirector General of Data Inspection in the actions prior to the start of this disciplinary procedure and documentation from IMI on the project decision.

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

October, of the Common Administrative Procedure of Public Administrations

sanction that could correspond would be 1,000 euros (one thousand euros), without prejudice to the resulting from the instruction.

FIFTH: NOTIFY this agreement to EUROPYMES SERVICIOS

INTEGRALES, S.L., with NIF B83247627, granting it a hearing period of ten

business days for him to formulate the allegations and present the evidence he deems convenient. In your statement of allegations you must provide your NIF and the number of procedure 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).

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Pursuant to article 85 of the LPACAP, a proceeding

disciplinary measure, if the offender acknowledges his responsibility, the problem may be resolved procedure with the imposition of the appropriate sanction.

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 sanction that should be imposed in this proceeding. With the application of this reduction, the sanction would be established at 800 euros, 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 sanction would be established at 800 euros 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

set at 600 euros.

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 (800 euros or 600 euros), you must make it effective through your deposit in the account number ES00 0000 0000 0000 0000 0000 opened in the name of the Spanish Data Protection Agency at the bank 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 reducing the amount to which welcomes.

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 procedure will have a maximum duration of nine months from the date of the initiation agreement or, where appropriate, of the draft initiation agreement.

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.

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Mar Spain Marti

Director of the Spanish Data Protection Agency

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SECOND: On August 17, 2022, the claimed party has proceeded to pay of the sanction in the amount of 800 euros making use of one of the two reductions provided for in the Startup Agreement transcribed above. Therefore, there has not been acknowledgment of responsibility.

THIRD: The payment made entails the waiver of any action or resource in the against the sanction, in relation to the facts referred to in the Commencement Agreement.

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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 and 48.1 of the Law Organic 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights (hereinafter, 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: "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

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.

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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 EXP202101826, in

in accordance with the provisions of article 85 of the LPACAP.

SECOND: NOTIFY this resolution to EUROPYMES SERVICIOS

INTEGRALES S.L.

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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