

936-031219

□ Procedure No.: PS/00200/2020

RESOLUTION R/00384/2020 TERMINATION OF THE PROCEDURE FOR PAYMENT

VOLUNTEER

In sanctioning procedure PS/00200/2020, instructed by the Agency

Spanish Data Protection to CASTILLA BASKETBALL FEDERATION

AND LEÓN, in view of the complaint filed by A.A.A., and based on the following,

BACKGROUND

FIRST: On August 11, 2020, the Director of the Spanish Agency for

Data Protection agreed to initiate a sanctioning procedure against the FEDERATION OF

BALONCESTO DE CASTILLA Y LEÓN (hereinafter, the claimed party), through the

Agreement that is transcribed:

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Procedure No.: PS/00200/2020

AGREEMENT TO START A SANCTION PROCEDURE

Of the actions carried out by the Spanish Agency for Data Protection and

based on the following

BACKGROUND

FIRST: On August 30, 2017, this Agency entered in writing

presented by A.A.A. (hereinafter, the claimant), against DIARIO DE BURGOS and the

BASKETBALL FEDERATION OF CASTILLA Y LEÓN regarding the dissemination

consent of your data by third parties through the internet.

It states that the writing disseminated by the newspaper in all its formats and disseminated on networks

the name and surname of the complainant appears together with the number of

DNI as well as its rubric and signature.

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And, among other things, attach the following documentation:

A copy of the news is provided in printed format from the DIARIO DE BURGOS dated

\*\*\*DATE.1 with headline “\*\*\*HOLDER.1” and where there is a letter sent by the CLUB

TIZONA BASKETBALL to the CASTILLA Y LEÓN BASKETBALL FEDERATION

dated July 18, 2017 and in which the name and surnames of the complainant appear

next to your ID number and your rubric or signature.

☐ Provide a copy of the acknowledgment of receipt dated July 26, 2017 at 12:20 p.m.

corresponding to a shipment.

☐ Provides a screenshot of a mobile terminal with a message dated Wednesday

July 26 in which there is a pdf document entitled "ESCRITO TIZONA".

☐ Provides a screenshot of the news item in [Diariodeburgos.es](http://Diariodeburgos.es) dated \*\*\*DATE.1 and

the acronym B.B.B. next to the date. The headline of the news is “Tizona “enreda” sobre el

Miraflores” and where there is a copy of the letter sent by the BASKETBALL CLUB

TIZONA to the CASTILLA Y LEÓN BASKETBALL FEDERATION dated to

July 18, 2017 and in which the name and surnames of the complainant appear

next to your ID number and your rubric or signature.

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SECOND: On September 12, 2017, after analyzing the documentation that was in the file, a resolution was issued by the Director of the Spanish Agency for Data Protection, agreeing to file the complaint number E/05214/2017. The resolution was notified to the affected party on September 19, 2017, according to notice of receipt in the file.

THIRD: On September 29, 2017, the affected party has filed a document before the corresponding Public Registry, being registered in the Agency on date 2 October 2017, in which you argue that your personal data has been disclosed such as those referring to name and surnames and DNI in a non-consensual way, which is contrary to the LOPD.

FOURTH: On October 30, 2017, a resolution was issued rejecting the appeal for replacement -RR/00764/2017- filed by the claimant against the Resolution of this Agency issued on September 12, 2017, agreeing to file the complaint number E/05214/2017.

In RR / 00764/2017, the dismissal sense of the resolution of the complaint is justified E/05217/2017, noting that the processing of the claimant's data linked to his status of representative of a sports entity, is outside the scope of application of the LOPD and, therefore, of the scope of action of this AEPD.

## FACTS

FIRST: The claimant files a contentious-administrative appeal before the Court National, (procedure CA/00004/2018), court that declares the resolutions of this Agency, previously indicated, for which the Spanish Agency for the Protection of Data agrees to start preliminary investigation actions, through the file E/06605/2019.

SECOND: The General Subdirectorate for Data Inspection proceeded to carry out preliminary investigative actions to clarify the facts in question, in

under the investigative powers granted to the supervisory authorities in article 57.1 of Regulation (EU) 2016/679 (General Data Protection Regulation, in hereinafter RGPD), and in accordance with the provisions of Title VII, Chapter I, Section

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second, of Organic Law 3/2018, of December 5, on Data Protection

Personal and guarantee of digital rights (hereinafter LOPDGDD).

THIRD: On February 14, 2020, THE BASKETBALL FEDERATION OF CASTILLA Y LEÓN sends this Agency the following information and statements:

1. That on July 26, 2017 they received a letter sent by the complainant in quality of president of CB TIZONA, coinciding with the one published in DIARIO DE BURGOS.
2. That, in federal procedures, especially when the matter to be resolved affects a third party also belonging to the Federation itself, transfer of the received in writing to the other party to provide the documentation or information that deem appropriate. In this case, the letter was delivered to the CB MIRAFLORES the same day 26.
3. That, in relation to the messages transmitted with the diffusion of the writing, they do not have constancy.
4. That they have no record that from any telephone line of the FEDERATION OF BALONCESTO DE CASTILLA Y LEÓN this document has been sent by WhatsApp.
5. That they will schedule new training and awareness actions for the staff of

face to maintain due diligence and practiced to date.

6. That they will provide training to the members of the Board of Directors in matters of data protection and will again send a reminder to clubs and individuals physical belonging to the different levels (referees and coaches) in this same line.

FOURTH: On February 17, 2020, DIARIO DE BURGOS, S.A. refer to this Agency the following information and statements:

1. That they have published on July 26, 2017 the news related to the whistleblower on paper and digital support for having public significance to local and provincial level.
2. That the complainant is a public figure in the city of Burgos and province because it holds the \*\*\*CARGO.1 and also the \*\*\*CARGO.2 being its data public personals appearing on official public lists.
3. That the processing of the complainant's personal data has been carried out in the context of the publication of information considered of public relevance of the news published in the territorial area in which the news is produced.
4. States that:

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“And it is the media that echoes, through the information received in the newsroom and duly contrasted, of a document presented by Mr. A.A.A. himself related to the TIZONA BASKETBALL CLUB, it is not a writing that remains within your personal sphere as a natural person and without

any significance.

In addition, the jurisprudence of the Supreme Court and National High Court in infinity of Judgments and the Constitutional Court itself have repeatedly affirmed the prevailing nature of the freedoms of expression and information on the protection of personal data in this case of Mr. AAA, the right to freedom of information is exercised by information professionals through of an institutionalized vehicle for the formation of public opinion, as is the case in this particular case, seeing the protection of those other rights weakened constitutional recognized by art. 20.4 CE against the freedoms of expression and information when they are exercised in connection with matters that are relevant public and social interest by a communication medium and refers to truthful information. “

Therefore, it concludes that the published information is completely true, as well as that DIARIO DE BURGOS does not use the WhatsApp system to communicate or spread news or any other information of another nature, and that they have never disseminated or distributed said news by Whatsapp unless unknown persons have taken a photograph of the news published and has been disseminated by this means, and that in no way is responsible for the actions of other people that have nothing to do with this media communication.

FIFTH: On March 6, 2020, a request for information is sent to CLUB BASKETBALL MIRAFLORES, S.A.D.

The notification is made electronically through notific@. According to this system of notification, automatic rejection has occurred after ten days natural from its availability.

The postal address of CLUB BALONCESTO MIRAFLORES, S.A.D. that appears in its privacy policy, this being Polideportivo El Plantío (office on the

fencing room), C/Cascajera s/n, 09007, Burgos and joining the section of investigated entities.

SIXTH: On June 8, 2020, a request for information is sent to CLUB BASKETBALL MIRAFLORES, S.A.D.

The notification is made by postal mail and has the status "Returned to Origin by Surplus (Not picked up at the office)" on 06/22/2020 at 08:10.

SEVENTH: On June 30, 2020, the CLUB postal address is verified BASKETBALL MIRAFLORES, S.A.D.:

□

consulted at [www.rmc.es](http://www.rmc.es) this is: C/ CASCAJERA S/N - SPORTS CENTER OF "THE PLANT" BURGOS.

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consulted at [www.fbcyl.es](http://www.fbcyl.es) this is: C/JUAN ALBARELLOS, 2-1º 09005 BURGOS.

FOUNDATIONS OF LAW

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By virtue of the powers that article 58.2 of the RGPD recognizes to each authority of control, and according to what is established in arts. 47 and 48.1 of the LOPDPGDD, the Director of The Spanish Agency for Data Protection is competent to resolve this process.

II

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

treatment of personal data.

For its part, article 5 of the RGPD establishes that personal data will be:

“a) processed in a lawful, loyal and transparent manner in relation to the interested party

("legality, loyalty and transparency");

b) collected for specific, explicit and legitimate purposes, and will not be processed

subsequently in a manner incompatible with those purposes; according to article 89,

section 1, further processing of personal data for archiving purposes in the interest

public, scientific and historical research purposes or statistical purposes shall not be considered

incompatible with the original purposes ("purpose limitation");

c) adequate, pertinent and limited to what is necessary in relation to the purposes for

those that are processed ("data minimization");

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d) accurate and, if necessary, updated; all measures will be taken

reasonable for the erasure or rectification without delay of the personal data that is

inaccurate with respect to the purposes for which they are processed (“accuracy”);

e) maintained in a way that allows the identification of the interested parties during

no longer than is necessary for the purposes of processing the personal data; the

personal data may be kept for longer periods as long as they are processed

exclusively for archival purposes in the public interest, scientific research purposes or

historical or statistical purposes, in accordance with article 89, paragraph 1, without prejudice to

the application of the appropriate technical and organizational measures imposed by this

Regulation in order to protect the rights and freedoms of the interested party ("limitation of the term



of conservation”);

f) processed in such a way as to ensure adequate security of the data

including protection against unauthorized or unlawful processing and against their

accidental loss, destruction or damage, through the application of technical measures or

appropriate organizational measures (“integrity and confidentiality”).

The controller will be responsible for compliance with the provisions

in section 1 and able to demonstrate it (“proactive responsibility”).”

### III

According to the evidence currently available,

and without prejudice to what results from the investigation, it is considered proven that on the 26th of

July 2017, the claimant proceeded to present the brief containing his

name, surnames and DNI, in his capacity as representative of the BASKETBALL CLUB

TIZONA, S.A.D. before the BASKETBALL FEDERATION OF CASTILLA Y LEÓN, and that

Almost immediately upon its reception by the aforementioned federal body, it began to

circulate on social media.

It is also confirmed that on \*\*\*DATE.1, DIARIO DE BURGOS published in its

printed edition and in its digital formats the document object of conflict, with the data

of the claimant, after having been sent by the FEDERATION OF

CASTILLA Y LEÓN BASKETBALL.

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### IV

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In relation to the DIARIO DE BURGOS, it should be noted that in accordance with the provisions of the

data protection regulations, the processing of personal data is considered lawful, in particular, when it is necessary for the satisfaction of legitimate interests pursued by the data controller or by a third party, provided that said interests are not prevail the interests or fundamental rights and freedoms of the affected party that require the protection of such data.

In relation to the dissemination of personal information in the media communication, it is necessary to take into consideration that article 20 of the Constitution Española protects, in particular, the right to freely express and disseminate thoughts, ideas and opinions through speech, writing or any other means of reproduction and also the right to freely communicate or receive truthful information by any broadcast medium.

The jurisprudence of the Constitutional Court tends to grant a position preference to freedom of expression over other constitutional rights when, Based on the veracity of the information provided, the reported facts are consider to be of public importance. This relevance is projected not only on those who carry out a public activity, but also in those who participate in events that are considered of interest to citizens. The jurisprudence has also determined that the discussion about the veracity of the published information is not incompatible with the pre-eminence of the right to information over the right to Data Protection.

The preferential value of the freedoms of expression and information reaches its highest level, according to the Constitutional Court, when they are exercised by the information professionals through the publication of information considered of public relevance through an institutionalized vehicle of opinion formation which prevents this Agency from carrying out additional weighting of the proportionality that, given its organic nature, would necessarily imply a

modality of administrative control over the contents of the published information

by means incompatible with our institutional system.

In relation to the publication of images in journalistic information, it is

It is also necessary to consider that Organic Law 1/1982, of May 5, on Protection

Civil Law of the Right to Honour, to personal and family privacy and to one's own image, in its

Article 8.2, establishes certain limitations in the protection of these rights if the

broadcast images were captured during a public act or in places open to the

public. These limitations also extend to cases in which the image of a

particular person appears as merely incidental to an event or occurrence

public.

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Regarding the origin of the published data, which can be diverse, it must be

It should be noted that the media, in the exercise of their constitutional rights, are

empowered to exercise their right to non-disclosure of their sources, in accordance with

what is included in section d) of article 20 of our Magna Carta, which recognizes the

right to professional secrecy for information professionals, in development of the

recognition provided for in article 19 of the Universal Declaration of Human Rights

Humans.

However, those affected may exercise the right of deletion provided for in the

data protection regulations, without prejudice to the rights granted by the aforementioned Law

Organic 1/1982, which can be exercised before the competent jurisdictional instance.

Those affected may also exercise, before the media, the

right provided for in Organic Law 2/1984, of March 26, regulating the right of rectification, which is referred to in article 85 of Organic Law 3/2018, of 5 December, of Protection of Personal Data and guarantee of digital rights, and that is outside the powers of this Agency.

v

In relation to the CASTILLA Y LEÓN BASKETBALL FEDERATION

It is verified that they sent the document with the claimant's personal data to the DIARIO DE BURGOS, and therefore is responsible for the violation of the confidentiality when sending said document with the claimant's personal data to the cited newspaper, for which it is considered that it has violated article 6.1 for a illicit treatment of the personal data of the claimant, in relation to article 5.1 f) of the RGPD, which governs the principles of integrity and confidentiality of personal data, as well as the proactive responsibility of the data controller to demonstrate its compliance.

SAW

Article 72.1.b) of the LOPDGDD states that "according to what is established in the article 83.5 of Regulation (EU) 2016/679 are considered very serious and will prescribe the three years the infractions that suppose a substantial violation of the articles mentioned therein and, in particular, the following:

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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

Article 58.2 of the RGPD provides the following: "Each supervisory authority shall have all of the following corrective powers listed below:

b) sanction any person responsible or in charge of the treatment with a warning

when the treatment operations have violated the provisions of this

Regulation;

d) order the person in charge or in charge of the treatment that the operations of

treatment comply with the provisions of this Regulation, where appropriate, in accordance with

a certain way and within a specified period;

i) impose an administrative fine under article 83, in addition to or instead of

the measures mentioned in this section, according to the circumstances of each case

particular;

viii

This infraction can be sanctioned with a fine of €20,000,000 maximum or,

in the case of a company, an amount equivalent to a maximum of 4% of the volume

of total annual global business of the previous financial year, opting for the one with the highest

amount, in accordance with article 83.5 of the RGPD.

Likewise, it is considered appropriate to graduate the sanction to be imposed in accordance with

the following criteria established by article 83.2 of the RGPD:

As aggravating the following:

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☐ In the present case we are dealing with unintentional, but significant, negligent action.

goes (article 83.2 b)

☐ Basic personal identifiers are affected, according to the article

83.2g)

Therefore, based on the foregoing,

By the Director of the Spanish Data Protection Agency,

HE REMEMBERS:

FIRST: START SANCTION PROCEDURE against the FEDERATION OF

BALONCESTO DE CASTILLA Y LEÓN, with NIF G09103458, in accordance with the

provided for in article 58.2.b) of the RGPD, for the alleged infringement of article 6 of the

RGPD, typified in article 83.5.a) of the RGPD in relation to article 72.1 b) of the

LOPDGDD.

SECOND: APPOINT instructor to R.R.R. and, as secretary, to S.S.S., indicating that

any of them may be challenged, where appropriate, in accordance with the provisions of the

Articles 23 and 24 of Law 40/2015, of October 1, on the Legal Regime of the Sector

Public (LRJSP).

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

claim filed by the claimants and their documentation, the documents

obtained and generated by the Subdirectorate General for Data Inspection during the

of investigations, as well as the report of previous inspection actions.

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

of the Common Administrative Procedure of the Public Administrations, the sanction that

could correspond would be 5,000 euros (five thousand euros) without prejudice to what is

of instruction.

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FIFTH: NOTIFY this agreement to the BASKETBALL FEDERATION OF CASTILLA Y LEÓN, with NIF G09103458 granting a hearing period of ten days

able to formulate the allegations and present the evidence that it considers convenient. In your brief of allegations you must provide your NIF and the number of procedure at the top 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 the Public Administrations (hereinafter, LPACAP).

In accordance with the provisions of article 85 of the LPACAP, in the event that the sanction to be imposed was a fine, it may acknowledge its responsibility within the term granted for the formulation of allegations to this initial agreement; what it will take coupled with a reduction of 20% of the sanction to be imposed in the present process. With the application of this reduction, the sanction would be established in €4,000 (four thousand 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 entail the reduction of 20% of its amount. With the application of this reduction, the sanction would be established at €4,000 (four thousand euros), and its payment will imply the termination of the process.

The reduction for the voluntary payment of the sanction is cumulative to the one

It is appropriate to apply for the acknowledgment of responsibility, provided that this acknowledgment of responsibility is revealed within the period granted

to formulate arguments at the opening of the procedure. The voluntary payment of amount referred to in the preceding paragraph may be made at any time prior to the resolution. In this case, if it were appropriate to apply both reductions, the amount of the penalty would be set at €3,000 (three thousand euros).

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

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In the event that you choose to proceed with the voluntary payment of any of the amounts indicated above 4,000 or 3,000 euros, you must make it effective by depositing it in account number ES00 0000 0000 0000 0000 0000 opened in the name of the Spanish Data Protection Agency at Banco 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 avails itself.

Likewise, you must send proof of payment to the General Subdirectorato 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. elapsed that term will produce its expiration and, consequently, the filing of actions; of in accordance with the provisions of article 64 of the LOPDGDD.

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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: On August 22, 2020, the claimant has proceeded to pay the

SECOND

sanction in the amount of 3000 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.

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By virtue of the powers that article 58.2 of the RGPD recognizes to each authority of control, and as established in art. 47 of the Organic Law 3/2018, of 5

December, of Protection of Personal Data and guarantee of digital rights (in hereinafter LOPDGDD), the Director of the Spanish Agency for Data Protection is competent to sanction the infractions that are committed against said

Regulation; infractions of article 48 of Law 9/2014, of May 9, General

Telecommunications (hereinafter LGT), in accordance with the provisions of the article 84.3 of the LGT, and the infractions typified in articles 38.3 c), d) and i) and 38.4 d), g) and h) of Law 34/2002, of July 11, on services of the society of the information and electronic commerce (hereinafter LSSI), as provided in article 43.1 of said Law.

## 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. A sanctioning procedure has been initiated, if the offender acknowledges his responsibility, the procedure may be resolved with the imposition of the sanction to proceed.

2. When the sanction is solely pecuniary in nature or fits impose a pecuniary sanction and another of a non-pecuniary nature but it has been justified 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 each. The aforementioned reductions must be determined in the notification of initiation of the procedure and its effectiveness will be conditioned to the withdrawal or Waiver 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 PS/00200/2020,

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

SECOND: NOTIFY this resolution to the BASKETBALL FEDERATION

OF CASTILE AND LEON.

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

Director of the Spanish Data Protection Agency

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