

□ File No.: EXP202202652

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 April 4, 2023, the Director of the Spanish Agency for
Data Protection agreed to initiate a sanctioning procedure against SECURITAS DIRECT
SPAIN, S.A. (hereinafter, the claimed party), through the Agreement that
transcribe:

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File No.: EXP202202652

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 claiming party) dated January 14, 2022
filed a claim with the Spanish Data Protection Agency. The
The claim is directed against SECURITAS DIRECT ESPAÑA, S.A. with NIF
A26106013 (SECURITAS DIRECT). The reasons on which the claim is based are the following:
following:

The complaining party, a SECURITAS DIRECT customer, states that they have received a
communication by a third party, apparently another client of the entity, in which
ensures that it has received from SECURITAS DIRECT, via email,
personal information concerning the complaining party. among the information

disclosed to this third party, would be the one related to the personal identification data of the complaining party, contractual details, electronic transaction details, as well as such as details of the installation of security devices in your home.

After bringing it to the attention of the company, hoping for some type of compensation they have only offered him an apology without any apparent action being taken.

Along with the claim, the following is provided:

- a mobile screen impression, in which you can see:

a) a telephone number, partially anonymized.

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b) the following text: Hi, I'm A.A.A., we've just talked, and delivery time is 3:30 p.m.

Hello, yes, good afternoon, and delivery time is 3:31 p.m.

c) sending the LOGALTY certificate to the email "****EMAIL.1" with the name

"SECURITAS DIRECT", and the time the message was sent 15:31

- a LOGALTY certificate, dated 12/21/2021, in which you appear as the sender of the notification SECURITAS DIRECT, and as recipients A.A.A., and with STATUS "no delivered, time expired."

- a mobile screen impression, in which you can see:

a) the partially anonymized telephone number

b) the date Tue, December 21. with the following text: "You're welcome. I let you know in any case" sent at 17:31.

c) a new shipment from SECURITAS DIRECT, sent at 18:01, in which the

It can read "we know that your alarm has gone off in the last few days. Luckily, it hasn't

been a real jump. But, do you know how we act in the face of these alarm jumps? As part of the message, it is seen written by the person who forwarded the message "right now" and time 18:10.

- content of the email, sent from SECURITAS DIRECT. CUSTOMERS, with addressee "AAA.", with delivery time 18:01, and containing the of the screen print.

SECOND: In accordance with article 65.4 of Organic Law 3/2018, of 5 December, Protection of Personal Data and guarantee of digital rights (in hereafter LOPDGDD), said claim was transferred to SECURITAS DIRECT, to proceed with its analysis and inform this Agency within a month, of the actions carried out to adapt to the requirements established in the data protection regulations.

The transfer, which was carried out in accordance with the regulations established in Law 39/2015, of October 1, of the Common Administrative Procedure of the Administrations Public (hereinafter, LPACAP), was collected on March 9, 2022 as It appears in the acknowledgment of receipt that is in the file.

On April 8, 2022, this Agency received a written response indicating:

The claimant contracted with SECURITAS DIRECT on November 21, 2021, appearing as contact email in the contract signed with the corresponding commercial address: "***EMAIL.1."

As this is the email provided on the title page of the contract with a of the company, is the one that was included in the systems, and to which the documentation associated with the contract. This documentation is sent through

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a trusted third party, which allows certifying the sending and receiving of the documentation, and which in this case is LOGALTY.

This documentation is:

- Contract of service. This contract is sent secured with password.

- recruitment certificate. This document has been sent without a password. They contribute as document 2, copy of this document.

SECURITAS declares that as of April 25, 2022 this document will be will proceed to send with password as well.

The personal data collected in this contract certificate are: name and surnames, ID and mobile phone. They consider that the email address, at be that of the receiver, it would have no impact.

After contracting and registering the service, on December 21, 2021, the part claimant contacted SECURITAS, and it is at this time that they have proof of the error in the email of the complaining party, which should be:

“***EMAIL.2”

SECURITAS declares that the data is corrected in the systems in a manner definitive on January 12, 2022.

In addition, SECURITAS reveals that 21 emails were sent emails to the wrong mail. He states that these would be notices or interactions of the customer with the system, such as power outages, performing photoreplays (they state that the photos are not included in the email) and activations and deactivations of the alarm system itself.

They add that only 7 emails of the 21 sent are known to have been opened, in which that, as they affirm, only the name and surname of the client would be included, and the address zip where the system is installed.

The entity wants to indicate that this assumption would not be an incident of security, but from an involuntary, punctual and isolated human error, which has as its origin the introduction, at the time of contracting the alarm system, of a email incorrectly, and that was corrected when it was knowledge.

They also state that they consider it to have been a specific and isolated incident, and therefore They have not communicated this to the regulator.

THIRD: On April 14, 2022, in accordance with article 65 of the LOPDGDD, the claim presented by the claimant party was admitted for processing.

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FOURTH: According to the report collected from the AXESOR tool, the entity SECURITAS DIRECT ESPAÑA, S.A. is a large company incorporated on March 17 of 1989, and with a turnover of €910,599,753 euros in the year 2021.

FUNDAMENTALS OF LAW

Yo

Competence

In accordance with the provisions of articles 58.2 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 and 4.2 of the GDPR, consists of the processing of personal data, since SECURITAS DIRECT collects and stores, among others, the following personal data of natural persons: name and surname, email, ID, among other treatments.

SECURITAS DIRECT carries out this activity in its capacity as the person responsible for the treatment, since it is who determines the purposes and means of such activity, by virtue of of article 4.7 of the GDPR.

Article 4 paragraph 12 of the GDPR defines, in a broad way, "violations of security of personal data" (hereinafter security breach) as "all those security violations that cause the destruction, loss or accidental or unlawful alteration of personal data transmitted, stored or processed otherwise, or unauthorized communication or access to such data."

In the present case, there is a personal data security breach in the

circumstances indicated above, categorized as a breach of confidentiality, by

have been sent by email to another SECURITAS DIRECT customer,

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documentation associated with the contracting carried out by the complaining party, in which contain your personal data.

Within the principles of treatment provided for in article 5 of the GDPR, the

integrity and confidentiality of personal data is guaranteed in section 1.f)

of article 5 of the GDPR. For its part, the security of personal data comes

regulated in articles 32, 33 and 34 of the GDPR, which regulate the security of the

treatment, the notification of a breach of the security of personal data to

the control authority, as well as the communication to the interested party, respectively.

II

Integrity and confidentiality

Article 5.1.f) "Principles relating to processing" of the GDPR establishes:

"1. Personal data will be:

(...)

f) processed in such a way as to guarantee adequate data security

personal data, including protection against unauthorized or unlawful processing and against

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

or organizational procedures ("integrity and confidentiality")."

In the present case, it is clear that the personal data of the complaining party, obtained

in the SECURITAS DIRECT database, were improperly exposed to a

third, by sending a person documentation associated with the contract

made by the complaining party.

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 SECURITAS DIRECT, for violation of article 5.1.f) of the

GDPR.

Classification and qualification of the infringement of article 5.1.f) of the GDPR

IV.

If confirmed, the aforementioned violation of article 5.1.f) 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:

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:

a) the basic principles for the treatment, including the conditions for the

consent under articles 5, 6, 7 and 9; (...)"

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In this regard, the LOPDGDD, in its article 71 "Infractions" 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 "Infractions 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:

a) The processing of personal data in violation of the principles and guarantees established in article 5 of Regulation (EU) 2016/679. (...)"

Penalty proposal for infringement of article 5.1.f) 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 appropriate to graduate the sanction to be imposed in accordance with the following criteria established in article 83.2 of the GDPR:

As aggravating factors:

- The nature, seriousness and duration of the infringement, taking into account the nature, scope or purpose of the processing operation in question such as the number of interested parties affected and the level of damages that have suffered (section a): for having transferred the personal data of the party claimant (name and surname, telephone number, DNI among others), to a third party not authorized to do so, having been sent 21 emails with the data corresponding to the contracting carried out with SECURITAS DIRECT.

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

following criteria established in section 2 of article 76 "Sanctions and measures

corrective measures" of the LOPDGDD:

As aggravating factors:

- The linking of the activity of the offender with the performance of treatment of

personal data (section b): the entity SECURITAS DIRECT is an entity

accustomed to the processing of personal data.

The balance of the circumstances contemplated in article 83.2 of the GDPR and 76.2 of

the LOPDGDD, with respect to the offense committed by violating what is established in the

Article 5.1.f) of the GDPR, allows an initial penalty of 30,000 euros (thirty

a thousand euros).

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SAW

Treatment safety

Article 32 "Security of treatment" of the GDPR establishes:

"1. Taking into account the state of the art, the application costs, and the

nature, scope, context and purposes of processing, as well as risks of

variable probability and severity for the rights and freedoms of individuals

physical, the person in charge and the person in charge of the treatment will apply technical and

appropriate organizational measures to guarantee a level of security appropriate to the risk,

which may include, among others:

- a) the pseudonymization and encryption of personal data;

- b) the ability to ensure confidentiality, integrity, availability and resilience

permanent treatment systems and services;

c) the ability to restore the availability and access to the personal data of

quickly in the event of a physical or technical incident;

d) a process of regular verification, evaluation and assessment of the effectiveness of the

technical and organizational measures to guarantee the security of the treatment.

2. When evaluating the adequacy of the security level, particular consideration will be given to

take into account the risks presented by data processing, in particular as

consequence of the destruction, loss or accidental or illegal alteration of data

personal information transmitted, preserved or processed in another way, or the communication or

unauthorized access to such data.

3. Adherence to an approved code of conduct pursuant to article 40 or to a

certification mechanism approved under article 42 may serve as an element

to demonstrate compliance with the requirements established in section 1 of the

present article.

4. The controller and the processor shall take measures to ensure that

any person acting under the authority of the controller or processor and

have access to personal data can only process such data by following

instructions of the person in charge, unless it is obliged to do so by virtue of the Law of

the Union or of the Member States.

In the present case, at the time of the breach, it cannot be said that

SECURITAS DIRECT has the appropriate measures to avoid the incident, in

the extent to which you submitted the documentation unencrypted or any other method that

prevent unauthorized access, with personal data of a client, related to the

contracting their services to another client. SECURITAS DIRECT has stated

have implemented the sending of this documentation through a password, but it

has done after the event occurred.

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Therefore, from all of the foregoing, it has been verified that SECURITAS DIRECT does not had the appropriate measures in place to prevent a situation such as this from occurring. the case at hand.

Therefore, in accordance with the evidence available in this agreement to initiate the disciplinary procedure, and without prejudice to what is of the instruction, it is considered that the known facts could constitute an infraction, attributable to SECURITAS DIRECT, for violation of article 32 of the GDPR.

Classification of the infringement of article 32 of the GDPR

VII

If confirmed, the aforementioned infringement of article 32 of the GDPR could lead to the commission of the offenses typified in article 83.4 of the GDPR that under the

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

Violations of the following provisions will be sanctioned, in accordance with the paragraph 2, with administrative fines of maximum EUR 10,000,000 or, in the case of a company, an amount equivalent to a maximum of 2% of the total annual global business volume 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; (...)"

In this regard, the LOPDGDD, in its article 71 "Infractions" 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 73 "Infractions considered serious" of the LOPDGDD indicates:

"Based on what is established in article 83.4 of Regulation (EU) 2016/679, are considered serious and will prescribe after two years the infractions that suppose a substantial violation of the articles mentioned therein and, in particular, the following:

(...)

f) The lack of adoption of those technical and organizational measures that result appropriate to guarantee a level of security appropriate to the risk of the treatment, in the terms required by article 32.1 of Regulation (EU) 2016/679". (...)

Penalty proposal for infringement of article 32 of the GDPR

VIII

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

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draft decision to initiate disciplinary proceedings, and without prejudice to what

resulting from the instruction, it is considered appropriate to graduate the sanction to be imposed according to in accordance with the following criteria established in article 83.2 of the GDPR:

As aggravating factors:

- The nature, seriousness and duration of the infringement, taking into account the nature, scope or purpose of the processing operation in question such as the number of interested parties affected and the level of damages that have suffered (paragraph a): In the present case, SECURITAS DIRECT did not have implemented the necessary measures according to the risk, to carry out the shipment of documentation with personal data via email, which affected the less than 1,650,000 interested parties, from the beginning of the activity until April 25 of 2022.

Likewise, it is considered appropriate to graduate the sanction to be imposed in accordance with the following criteria established in section 2 of article 76 "Sanctions and measures corrective measures" of the LOPDGDD:

As aggravating factors:

- Linking the activity of the infringer with the performance of data processing personal information (section b): the SECURITAS DIRECT entity is an entity accustomed to processing of personal data.

The balance of the circumstances contemplated in article 83.2 of the GDPR and 76.2 of the LOPDGDD, with respect to the offense committed by violating what is established in the Article 32 of the GDPR, allows initially setting a penalty of €20,000 (twenty thousand euro).

IX

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, 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...". The imposition of this measure is compatible with the sanction consisting of an administrative fine, according to the provisions of art. 83.2 of the GDPR.

It is noted that not attending to the possible order to adopt measures imposed by this body in the sanctioning resolution may be considered as a administrative offense in accordance with the provisions of the GDPR, classified as 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,

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HE REMEMBERS:

FIRST: INITIATE SANCTION PROCEDURE against SECURITAS DIRECT

ESPAÑA, S.A., with NIF A26106013, for the alleged violation of articles 5.1.f) and 32 of the GDPR, typified, respectively, in articles 83.5 and 83.4 of the GDPR.

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

indicating that they may be challenged, if applicable, 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 into the disciplinary file, for evidentiary purposes, the claim filed by the claimant and its documentation, as well as the documents obtained and generated by the Sub-directorate General of Inspection of

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

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, the sanction that could correspond would be:

- For the alleged violation of article 5.1.f) of the GDPR, typified in article 83.5 of said regulation, an administrative fine of 30,000 euros
- For the alleged infringement of article 32 of the GDPR, typified in article 83.4 of said regulation, an administrative fine of 20,000 euros

FIFTH: NOTIFY this agreement to SECURITAS DIRECT ESPAÑA, S.A., with NIF A26106013, granting a hearing period of ten business days so that Formulate the allegations and present the evidence that you consider appropriate. In its pleadings must provide your NIF and the procedure number that appears at the top 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 sanction that should be imposed in this proceeding. With the application of this reduction, the sanction would be established at 40,000 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 40,000 euros and its payment will imply the termination of the procedure, without prejudice to the imposition of the corresponding measures.

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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 this case, if both reductions were to be applied, the amount of the penalty would remain established at 30,000 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 previously indicated 40,000 euros or 30,000 euros, you must make it effective by entering the account number IBAN: ES00-0000-0000-0000-0000-0000 open in the name of the Spanish Data Protection Agency in 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 cause of reduction of the amount to which it receives.

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.

Mar Spain Marti

Director of the Spanish Data Protection Agency

935-080323

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SECOND: On April 21, 2023, the claimed party has proceeded to pay the sanction in the amount of 30,000 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.

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FUNDAMENTALS OF LAW

Yo

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 EXP202202652, in

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

SECOND: NOTIFY this resolution to SECURITAS DIRECT ESPAÑA,

S.A.

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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