

□ File No.: EXP202105653

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 June 9, 2022, the Director of the Spanish Agency for
Data Protection agreed to initiate sanctioning proceedings against LAST LAP, S.L. (in
hereinafter, the claimed party), through the Agreement that is transcribed:

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File No.: EXP202105653

AGREEMENT TO START A SANCTION PROCEDURE

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

FACTS

FIRST: A.A.A. (hereinafter, the complaining party) dated October 31, 2021
filed a claim with the Spanish Data Protection Agency.

The claim is directed against LAST LAP, S.L. with NIF B80891211 (hereinafter, the
claimed party).

The claim is directed against the organizer of the San Silvestre Vallecana because
requires participants, in order to register for the race, to provide their passport
COVID or, failing that, submit a PCR or antigen test done within 72 hours
pre-race.

The result of the test signed by a physician will be required by e-mail 96
hours before the race and will have to be uploaded to the link that will be in said e-mail (art,

10 of the Race Regulations).

Specifically, it refers to the fact that consent is not specifically collected.

and that the data retention period is not reported.

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

December, of Protection of Personal Data and guarantee of digital rights (in

hereinafter LOPDGDD), on December 27, 2021, said claim was transferred

to the claimed party, so that it could proceed with its analysis and inform this Agency in

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within a month, of the actions carried out to adapt to the requirements

provided for 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 December 27, 2021 as

It is stated in the acknowledgment of receipt that is in the file.

On January 26, 2022, in response to the aforementioned request, the entity claimed

stated that it carried out the collection and processing of personal data of the

users interested in participating in the San Silvestre Vallecana race and neither the

claimant, nor any other user, has submitted any request to exercise

data protection rights before the claimed entity.

The entity complained against alleges that the purpose of requesting said personal data is not

other than avoiding possible infections and, in this way, protecting the health of all

participants in the race.

The claimed entity prepared and published a Race Regulation, which all users can find in his web page

(<https://sansilvestrevallecana.com/descargas/ReglamentoPopular.pdf>).

and consult

The basis that legitimizes the treatment of the data of the participants in the race, including your health data, is the execution of the contractual relationship established between registered users and the claimed entity and considers that, in no moment, consent may be the basis that legitimizes this data processing, since, in this case, any registered user could refuse to provide these evidence, participating in the race while infected with COVID-19 and infecting other participants.

He points out that he does not have a Data Protection Delegate, because he is not within the entities obliged to not process data on a large scale, nor of categories special data or data relating to convictions and criminal offenses

Regarding the evidence requested to participate in the race (COVID passport or PCR test or antigens), these evidences have been eliminated once they are no longer necessary, that is, once the race is over, since we understand that there is no no legal obligation to retain such information nor is it possible to receive claims relating to said data processing for the purpose for which were collected (registered users who provided the corresponding evidence already participated in the race).

He concludes by saying that since the next race of the San Silvestre Vallecana will take place on December 31, 2022, if by that time the situation regarding COVID-19, we will analyze the situation and, since it is likely there is no need to request such evidence, it will not be requested or collected or

These health data of future participants will be processed, however, in the event of that is considered necessary or mandatory, unless the AEPD provides otherwise, will also proceed to collect them for the purposes indicated previously.

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THIRD: On January 31, 2022, in accordance with article 65 of the LOPDGDD, the claim filed by the claimant was admitted for processing.

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 the provisions of articles 47 and 48 of the LOPDGDD, the Director of the Spanish Agency for Data Protection is competent to initiate and to resolve this procedure.

II

The RGPD in its article 5, "Principles related to the treatment" says that "The data personal will be:

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

(<<legality, loyalty and transparency>>)"

Article 6 of the RGPD, "Legality of the treatment", specifies in section 1 the assumptions in which the processing of third party data is considered lawful:

"1. The treatment will only be lawful if it meets at least one of the following

conditions:

a) the interested party gave their consent for the processing of their personal data

for one or more specific purposes;

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

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

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

data controller;

d) the treatment is necessary to protect the vital interests of the interested party or another

Physical person.

e) the treatment is necessary for the fulfillment of a mission carried out in the interest

public or in the exercise of public powers vested in the data controller;

f) the treatment is necessary for the satisfaction of legitimate interests pursued

by the data controller or by a third party, provided that said interests

interests do not prevail or the fundamental rights and freedoms of the interest

cases that require the protection of personal data, in particular when the interested

sado be a child.

The provisions of letter f) of the first paragraph shall not apply to the processing

by public authorities in the exercise of their functions.

2.Member States may maintain or introduce more specific provisions

in order to adapt the application of the rules of this Regulation with regard to the

treatment in compliance with section 1, letters c) and e), setting more precisely

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specifies specific treatment requirements and other measures that guarantee treatment lawful and fair treatment, including other specific treatment situations under chapter IX.

3. (...)''

Article 9 of the RGPD establishes the following:

1. The processing of personal data that reveals ethnic origin is prohibited or racial background, political opinions, religious or philosophical convictions, or affiliation union, and the processing of genetic data, biometric data aimed at identifying unambiguously to a natural person, data relating to health or data relating to sexual life or sexual orientations of a natural person.

2. Section 1 shall not apply when one of the following circumstances occurs-
following:

- a) the interested party gave their explicit consent for the processing of said data for one or more of the specified purposes, except when the Right of the Union or the Member States establishes that the prohibition referred to in the section 1 cannot be lifted by the interested party;
- b) the treatment is necessary for the fulfillment of obligations and the exercise of specific rights of the person in charge of the treatment or of the interested party in the field of Labor law and security and social protection, to the extent that it is so authorized. enact the Law of the Union of the Member States or a collective agreement with under the Law of the Member States that establishes adequate guarantees of the res-protection of the fundamental rights and interests of the interested party;
- c) the treatment is necessary to protect the vital interests of the interested party or another natural person, in the event that the interested party is not qualified, natural or legal, cally, to give your consent;
- d) the treatment is carried out, within the scope of its legitimate activities and with the de-

guarantees, by a foundation, an association or any other organization without for profit, whose purpose is political, philosophical, religious or trade union, provided that the treatment refers exclusively to current or former members of such organizations. organizations or persons who maintain regular contact with them in relation to its purposes and provided that the personal data is not communicated outside of them without the consent of the interested parties;

e) the treatment refers to personal data that the interested party has made manifest-public mind;

f) the treatment is necessary for the formulation, exercise or defense of claims.

tions or when the courts act in the exercise of their judicial function;

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g) the treatment is necessary for reasons of an essential public interest, on the basis of the law of the Union or of the Member States, which must be proportional the objective pursued, essentially respect the right to data protection and establish adequate and specific measures to protect the interests and rights fundamentals of the interested party;

h) the treatment is necessary for the purposes of preventive or occupational medicine, evaluation of the worker's work capacity, medical diagnosis, provision of assistance or treatment of a health or social nature, or management of health care systems and services.

health and social care, on the basis of the Law of the Union or of the Member States.

or by virtue of a contract with a healthcare professional and without prejudice to the conditions tions and guarantees contemplated in section 3;

i) the treatment is necessary for reasons of public interest in the field of health

such as protection against serious cross-border threats to health, or

to ensure high levels of quality and safety of healthcare and

of medicines or medical devices, on the basis of Union Law or

of the Member States to establish appropriate and specific measures to pro-

protect the rights and freedoms of the interested party, in particular professional secrecy,

j) the processing is necessary for archiving purposes in the public interest, research purposes,

scientific or historical information or statistical purposes, in accordance with article 89,

paragraph 1, on the basis of the law of the Union or of the Member States, which

must be proportional to the objective pursued, respect essentially the right to

data protection and establish adequate and specific measures to protect the

interests and fundamental rights of the interested party.

3. The personal data referred to in section 1 may be processed for the purposes cited-

two in section 2, letter h), when their treatment is carried out by a professional

subject to the obligation of professional secrecy, or under your responsibility, in accordance

with the Law of the Union or of the Member States or with the established rules

by the competent national bodies, or by any other person also subject to

also to the obligation of secrecy in accordance with the Law of the Union or of the States.

two members or of the standards established by the competent national bodies.

you.

4. Member States may maintain or introduce additional conditions, including

ive limitations, with respect to the processing of genetic data, biometric data or

health-related data.

III

Article 4.11 of the RGPD defines the consent of the interested party as "any

manifestation of free, specific, informed and unequivocal will by which the

The interested party accepts, either by means of a declaration or a clear affirmative action, the processing of personal data concerning you”.

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In this sense, article 6.1 of the RGPD, establishes that “The treatment will only be lawful if at least one of the following conditions is met:

a) the interested party gave their consent for the processing of their personal data for one or more specific purposes;

b) the treatment is necessary for the execution of a contract in which the interested party is a party or for the application at the request of the latter of measures pre-contractual;

c) the treatment is necessary for the fulfillment of an applicable legal obligation to the data controller;

d) the treatment is necessary to protect the vital interests of the interested party or another Physical person;

e) the treatment is necessary for the fulfillment of a mission carried out in public interest or in the exercise of public powers vested in the person responsible for the treatment;

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

The Spanish legislator has provided itself with the necessary legal measures to face situations of health risk, such as Organic Law 3/1986, of 14 April, of Special Measures in the Matter of Public Health (modified by Real Decree-law 6/2020, of March 10, by which certain measures are adopted urgent in the economic sphere and for the protection of public health, published in the Official State Gazette of March 11, 2020) or Law 33/2011, of March 4, October, General Public Health.

Article 3 of Organic Law 3/1986 states that: "In order to control the communicable diseases, the health authority, in addition to carrying out the actions general preventive measures, may adopt the appropriate measures to control the sick, the people who are or have been in contact with them and the immediate environment, as well as those deemed necessary in the event of

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transmissible risk."

In the same way, articles 5 and 84 of Law 33/2011, of October 4, General of Public Health refer to the previous Organic Law 3/1986, and to the possibility of take additional measures in case of risk of disease transmission.

Therefore, in terms of risk of disease transmission, epidemic, crisis etc., the applicable regulations have granted "the health authorities of the different public administrations" (article 1 Organic Law 3/1986, of April 14) the powers to adopt the necessary measures provided for in said laws when

so required by health reasons of urgency or necessity.

Consequently, from a personal data processing point of view, the

Safeguarding of essential interests in the field of public health corresponds to

the different health authorities of the different public administrations,

who may adopt the necessary measures to safeguard said interests

public health essentials in public health emergency situations (Report

of the AEPD Legal Office N/REF: 0017/2020)

On the other hand, it should be remembered that the sanitary measures adopted by the

health authorities must be subject to judicial ratification, provided for in the

Articles 10.8 and 11.1.i) of the Contentious-Administrative Jurisdiction Law (LJCA), and

cannot be applied by the Administration before the Contentious Chamber

The corresponding administrative is pronounced on the matter.

v

In the present case, the entity claimed when requesting the participants in the race

of San Silvestre, provide the COVID passport or, failing that, present proof

PCR or of antigens done in the 72 hours prior to the race via email, has

processed personal data specially protected in accordance with the

article 9.2 of the RGPD without finding the claimed entity in any of the

assumptions allowed, as indicated in the basis of law II.

In addition, the claimed entity has proceeded to the processing of personal data

lacking legitimacy to do so, thereby violating article 6 of the RGPD, as

as indicated in the foundation of law III.

Thus, this Agency considers that the entity claimed, without prejudice to what

result of the instruction, by requiring a PCR or antigen test done within 72 hours

prior to the race via email, has violated two precepts, first

Article 9.2 of the RGPD, when processing specially protected data, without being in

none of the assumptions allowed in said article indicated as an exception, and in secondly, article 6 of the RGPD, since we are facing a treatment of personal data without legitimacy that justifies said treatment, in accordance with data protection regulations.

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Article 58.2 of the RGPD provides the following: "Each control authority will have of all the following corrective powers indicated below:

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 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;

7th

The infringement of article 9 of the RGPD, for which the claimed party is responsible, is provided for in article 83.5 of the RGPD where it is established that:

"The infractions of the following dispositions will be sanctioned, in accordance with the section 2, with administrative fines of a maximum of 20,000,000 Eur or, in the case of of a company, of 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:

a)

consent under articles 5,6,7 and 9.”

The basic principles for the treatment, including the conditions for the

In turn, the LOPDGDD in its article 72.1.e) qualifies as a very serious infraction,

purposes of prescription, “The treatment of personal data of the categories to which

referred to in article 9 of Regulation (EU) 2016/679 without any of the

the circumstances provided for in said precept and in the article of this Organic Law.”

viii

The violation of article 6 of the RGD is typified in article 83.5 of the

RGPD that, under the heading “General conditions for the imposition of fines

administrative”, says:

“5. Violations of the following provisions will be sanctioned, in accordance with the

section 2, with administrative fines of a maximum of 20,000,000 Eur or, in the case of

of a company, of 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:

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

consent under articles 5,6,7 and 9.”

The LOPDGDD in its article 72.1.b) qualifies this infraction, for prescription purposes,

as a very serious infringement, “The processing of personal data without the concurrence

any of the conditions of legality of the treatment established in article 6 of the

Regulation (EU) 2016/679.”

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In order to determine the administrative fines to be imposed, the provisions of articles 83.1 and 83.2 of the RGPD, precepts that indicate:

“Each control authority will guarantee that the imposition of administrative fines under this Article for infringements of this Regulation indicated in sections 4, 9 and 6 are in each individual case effective, proportionate and dissuasive.”

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

- a) the nature, seriousness and duration of the offence, taking into account the nature nature, scope or purpose of the treatment operation in question, as well as the number number of interested parties affected and the level of damages they have suffered;
- b) intentionality or negligence in the infringement;
- c) any measure taken by the controller or processor to pa-allocate the damages suffered by the interested parties;
- d) the degree of responsibility of the person in charge or of the person in charge of the treatment, gives an account of the technical or organizational measures that have been applied by virtue of the articles 25 and 32;
- e) any previous infringement committed by the person in charge or the person in charge of the treatment;
- f) the degree of cooperation with the supervisory authority in order to remedy the infringement and mitigate the possible adverse effects of the infringement;
- g) the categories of personal data affected by the infringement;
- h) the way in which the supervisory authority became aware of the infringement, in particular

whether the person in charge or the person in charge notified the infringement and, if so, to what extent.

gives;

i) when the measures indicated in article 58, section 2, have been ordered

previously against the person in charge or the person in charge in question in relation to the

same matter, compliance with said measures;

j) adherence to codes of conduct under Article 40 or to certification mechanisms

fication approved in accordance with article 42, and

k) any other aggravating or mitigating factor applicable to the circumstances of the case,

such as financial benefits obtained or losses avoided, directly or indirectly.

mind, through infraction.”

Regarding section k) of article 83.2 of the RGPD, the LOPDGDD, article 76, “Sanctions and

corrective measures”, provides:

“two. In accordance with the provisions of article 83.2.k) of Regulation (EU) 2016/679, also

may be taken into account:

a) The continuing nature of the offence.

b) The link between the activity of the offender and the performance of data processing

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personal.

c) The profits obtained as a result of committing the offence.

d) The possibility that the conduct of the affected party could have induced the commission of the crime.

infringement.

e) The existence of a merger by absorption process subsequent to the commission of the

infringement, which cannot be attributed to the absorbing entity.

f) Affectation of the rights of minors.

g) Have, when not mandatory, a data protection delegate.

h) Submission by the person in charge or person in charge, on a voluntary basis, to

alternative conflict resolution mechanisms, in those cases in which

there are controversies between them and any interested party.”

In accordance with the transcribed precepts, and without prejudice to what results from the instruction

of the procedure, in order to set the amount of the fine sanction to be imposed on LAST

LAP, S.L. as responsible for an infringement typified in article 83.5.a) of the RGPD, in

an initial assessment, they are considered concurrent in the present case, as

aggravating factors, the following factors:

☐

Number of stakeholders affected

The link between the activity of the offender and the performance of

☐

personal data processing.

Therefore, based on the foregoing,

By the Director of the Spanish Data Protection Agency,

HE REMEMBERS:

FIRST: START SANCTION PROCEDURE against LAST LAP, S.L. with

NIF B80891211, in accordance with the provisions of article 58.2.i) of the RGPD, by the

alleged infringement of article 9 of the RGPD, typified in article 83.5.a) of the RGPD

and for prescription purposes, by article 72.1 e) of the LOPDGDD.

SECOND: INITIATE PUNISHMENT PROCEDURE against LAST LAP, S.L. with

NIF B80891211, in accordance with the provisions of article 58.2.i) of the RGPD, by the

alleged infringement of article 6 of the RGPD, typified in article 83.5.a) of the RGPD

and for prescription purposes, by article 72.1 b) of the LOPDGDD.

THIRD: 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).

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FOURTH: INCORPORATE to the disciplinary file, for evidentiary purposes, the claim filed by the claimants and their documentation, the documents obtained and generated by the General Subdirectorate for Data Inspection during the investigation phase, as well as the report of previous Inspection actions.

FIFTH: THAT for the purposes provided in art. 64.2 b) of Law 39/2015, of 1 October, of the Common Administrative Procedure of the Public Administrations, the sanction that could correspond for the infringement of article 9 of the RGPD would be 10,000 euros (ten thousand euros) without prejudice to what results from the instruction.

SIXTH: THAT for the purposes provided in art. 64.2 b) of Law 39/2015, of 1 October, of the Common Administrative Procedure of the Public Administrations, the sanction that could correspond for the infringement of article 6 of the RGPD would be 6,000 euros (six thousand euros) without prejudice to what results from the instruction.

SEVENTH: NOTIFY this agreement LAST LAP, S.L. with NIF B80891211 granting him a hearing period of ten business days to formulate the pleadings and submit any evidence you deem appropriate. In his writing of allegations you must provide your NIF and the procedure number that appears in the

header of this document.

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

In accordance with the provisions of article 85 of the LPACAP, in the event that the sanction to be imposed was a fine, it may recognize its responsibility within the term granted for the formulation of allegations to this initial agreement; it which will entail a reduction of 20% of the sanction to be imposed in the present procedure. With the application of this reduction, the first sanction would be established at 8,000 euros, and the second penalty at 4,800 euros resolving the procedure with the imposition of this sanction.

Similarly, you may, at any time prior to the resolution of this procedure, carry out the voluntary payment of the proposed sanction, which will mean a reduction of 20% of the amount of this. With the application of this reduction, the first sanction would be established at 8,000 euros, and the second sanction in 4,800 euros, and its payment will imply the termination of the procedure.

The reduction for the voluntary payment of the penalty is cumulative with the corresponding apply for the acknowledgment of responsibility, provided that this acknowledgment of the responsibility is revealed within the period granted to formulate arguments at the opening of the procedure. The voluntary payment of the referred amount in the previous paragraph may be done at any time prior to the resolution. In In this case, if it were appropriate to apply both reductions, the amount of the penalty would be established in the first sanction in 6,000 euros (six thousand euros) and the second in 3,600 euros (three thousand six hundred euros)

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

If you choose to proceed to the voluntary payment of any of the amounts indicated previously, 8,000 or 6,000 euros, in the first sanction and 4,800 or 3,600 euros, in the second sanction, you must make it effective by depositing it in account number ES00 0000 0000 0000 0000 opened in the name of the Spanish Agency for the Protection of Data in Banco CAIXABANK, S.A., indicating in the concept the number of reference of the procedure that appears in the heading of this document and the cause of reduction of the amount to which it is accepted. Also, you must send the proof of admission to the Subdirector General for Inspection to continue with the procedure in accordance with the amount entered.

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

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

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 Agency for Data Protection.

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SECOND: On June 17, 2022, the claimed party has proceeded to pay

the sanction in the amount of 9600 euros making use of the two reductions provided in the Startup Agreement transcribed above, which implies the recognition of the responsibility.

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

FOUNDATIONS OF LAW

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In accordance with the powers that article 58.2 of Regulation (EU) 2016/679 (General Data Protection Regulation, hereinafter RGPD), grants each control authority and as established in articles 47 and 48.1 of the Law Organic 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 Data Protection Agency.

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

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

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

"Termination in sanctioning procedures" provides the following:

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

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

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

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

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

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

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

compensation for damages caused by the commission of the infringement.

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

competent body to resolve the procedure will apply reductions of, at least,

20% of the amount of the proposed sanction, these being cumulative with each other.

The aforementioned reductions must be determined in the notification of initiation

of the procedure and its effectiveness will be conditioned to the withdrawal or resignation of

any administrative action or recourse against the sanction.

The reduction percentage provided for in this section may be increased

regulations."

According to what was stated,

the Director of the Spanish Data Protection Agency RESOLVES:

FIRST: TO DECLARE the termination of procedure EXP202105653, of

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

SECOND: NOTIFY this resolution to LAST LAP, S.L..

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.

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 www.aepd.es

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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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