 File No.: PS/00445/2020

RESOLUTION OF PUNISHMENT PROCEDURE

Of the procedure instructed by the Spanish Agency for Data Protection and based on

to the following

BACKGROUND

FIRST: On 07/07/2020 it had entry in the Spanish Protection Agency

of Data a claim directed against SPHERE CAPITAL AGENCY OF

VALUES, S.A. (in XXXXXXXX), with CIF A04791943 (hereinafter, SPHERE

CAPITAL or claimed). The grounds on which the claim is based are

following:

"1. Being an investment services company, regulated by the legislation of the

Stock Market, should have a Data Protection Officer. this figure already

does not exist in the Entity.

2. No Data Protection Impact Assessment has been carried out.

3. There is no Code of Conduct in accordance with the provisions of article 40 of the

Regulation (EU) 2016/679.

4. […]" (At this point the claimant makes a complaint about the alleged

improper communication of your personal data to third parties).

CAPITAL SPHERE A.V. is part of a Business Group, also formed by SPHERE

CAPITAL MANAGEMENT SGIIC S.A.U. and VISUAL CHART GROUP S.L."

With your claim, you only provide emails to document the

improper communication of data referred to in point 4 of your claim.

The claimant, in different writings, has made a claim against the other

entities of the business group, mentioned above, requesting that the

confidentiality of the claims "for fear of retaliation from the company".

SECOND: Prior to the acceptance of this claim for processing, it is

transferred to the claimed on 08/12/2020, in accordance with the provisions of the

Article 65.4 of the Organic Law 3/2018, of December 5, on Data Protection

Personal and guarantee of digital rights (hereinafter, LOPDGDD). In this

transfer process, the respondent was asked to provide, among other things, the information and/or

or following documentation:

“- If DPD has been appointed and the Spanish Protection Agency has been notified

of data.

- Copy of the impact assessment carried out or, where appropriate, the reasons why

It is not performed".

On 09/07/2020, the Data Protection Agency received a letter of

response, submitted by LIBERA DIGITAL CONSULTORÍA TECNOLÓGICA, S.L.

(hereinafter LIBERA DIGITAL) on behalf of the claimed entity.

This document states that the defendant is in the process of closing and without

activity since May 2020, although, despite this, they have decided to dispense with the

person dealing with personal data management and outsourcing the function,

which has been entrusted to LIBERA DIGITAL with the task of evaluating the application

regulations and data security.

Regarding the lack of a data protection delegate, it indicates that the company, due to its

characteristics is not identified with any of the cases regulated in article 34 of

the LOPDGDD. It is, as he indicates, a small company that has created a

finance control program with general and small information

scale. And he ends by noting that, if necessary, he will register a DPD.

To improve the management of personal data, it will be checked every two months by

the external entity, a report has been prepared on compliance with the regulations and

Measures have been taken to improve the deficiencies, as well as the safety of the

data.

Finally, it points out that, as a sign of its commitment, it encloses a report

on the technical structure of the company, an impact assessment and a report

about the data processing it performs. It is concluded that there are no risks in the

Resources used.

In the documentation provided, LIBERA DIGITAL is identified as DPD of the

claimed entity.

Attach the following documentation:

1. Protocol of action for the exercise of the rights of the interested party (articles 15

to 22 of Regulation (EU) 2016/679, General Data Protection Regulation, in

hereinafter GDPR); and application form for the exercise of rights.

2. Document called "Risk Analysis" (in duplicate).

3. Document called “Regulatory compliance report”.

4. Document called “Technical and organizational structure of the company”.

5. Document called “Basic data processing”.

THIRD: The claim was admitted for processing by agreement of the Director of

the Spanish Agency for Data Protection dated 03/11/2020.

FOURTH: On 06/08/2021, the Official State Gazette published the

Resolution of the National Securities Market Commission of 05/14/2021, by which

the publication of the revocation and simultaneously the deregistration of the Registry is arranged

Administrative of the aforementioned Commission to SPHERE CAPITAL, as a consequence of the

request for voluntary resignation to the authorization presented by the administrators

bankruptcy appointed by court order, within the procedure of

ordinary contest

FIFTH: On 07/01/2021, by the General Subdirectorate for Data Inspection

access to the information related to the claimed that appears in the RMC. I know

verifies that the entity was established in 2014 and is currently “in

XXXXXXXX”. As corporate purpose is indicated:

The Company shall have as its exclusive corporate purpose the development of activities

allowed to Securities Agencies as investment services companies by the

article 143 of Law 4/2015”.

SIXTH: Dated 08/02/2021, by the General Subdirectorate for Data Inspection

the Register of Data Protection Delegates of the AEPD is accessed and

verifies that, as of that date, there is no DPO designated by the entity

claimed.

SEVENTH: On 08/16/2021, the Director of the Spanish Protection Agency

of Data agreed to initiate a sanctioning procedure against the claimed entity, in accordance with

to the provisions of articles 63 and 64 of Law 39/2015, of October 1, of the

Common Administrative Procedure of Public Administrations (hereinafter,

LPACAP), for the alleged infringement of article 37.1 of the RGPD in relation to the

article 34.1 of the LOPDGDD, typified in article 83.4 of the RGPD and article 71

of the LOPDGDD; stating in said agreement that the sanction that could

to correspond would be a warning, without prejudice to what results from the investigation.

In the same agreement to open the procedure, the claimed entity was warned

that if it did not make allegations within the stipulated period, said agreement could be

considered resolution proposal, according to what is established in article 64.2.f) of the

LPACAP.

The notification of the opening agreement sent to SPHERE CAPITAL by the Secretariat

General of the AEPD, through the Electronic Notifications Service and Address

Electronic Enabled, it was expired.

EIGHTH: On 09/23/2021, this Agency received a letter from the entity

claimed in which he states that he could not access the electronic notification of the

agreement to open the procedure due to a problem with the certificate. requested that

said agreement was incorporated again into the “Citizen Mailbox”.

In response to this letter, on the same date of 09/23/2021, the General Secretariat

of the AEPD informed the respondent that the aforementioned agreement was

accessible from the General Access Point (www.060.es) and from the web portal of the

AEPD itself and the corresponding link was inserted, with details of the data that

should be entered to get the document.

There is no record in this Agency of any brief of allegations presented by the respondent

in connection with this proceeding.

NINTH: On 10/22/2021, the instructor of the procedure formulated

resolution proposal in the sense that by the Director of the Spanish Agency

of Data Protection is addressed warning against the claimed entity, by the

infringement of article 37.1 of the RGPD in relation to article 34.1 of the LOPDGDD,

typified in article 83.4 of the RGPD and article 71 of the LOPDGDD, and qualified

as serious for prescription purposes in article 73, letter v), of the LOPDGDD.

TENTH: Notification of the aforementioned proposed resolution, dated 11/08/2021, received

letter from the Bankruptcy Administrator of the claimed entity in which he informs that

this entity agreed, on 03/30/2019, the appointment of a DPO, who was

duly communicated to this Agency.

With his arguments, he provides a copy of the reception receipt issued by the

General Register of Data Protection, dated 04/12/2019. Through this letter,

This Agency informs the requested entity of its inclusion in the list provided for in the

article 34.4 of the LOPDGDD of the information corresponding to the DPD designated by

the same.

ELEVENTH: The Subdirectorate General for Data Inspection collected

the records corresponding to the registration of the DPD appointed by the entity

claimed, verifying that the registration dated 04/12/2019 is recorded and that, after

request of said entity, caused withdrawal on 06/03/2020.

Of the actions carried out in this procedure and the documentation

in the file, the following have been accredited:

PROVEN FACTS

FIRST: The company SPHERE CAPITAL was established in 2014 with the following

corporate purpose: “The Company shall have as its exclusive corporate purpose the development of the

Activities permitted to Securities Agencies as brokerage service companies

investment by article 143 of Law 4/2015”.

SECOND: sphere capital has stated before this Agency that it is in the process of

closure and no activity since May 2020. According to the information in the

RMC, this entity is currently “at XXXXXXXX”.

THIRD: On 05/14/2021, SPHERE CAPITAL has terminated as an agency of securities in the Registry of the National Securities Market Commission, by voluntary resignation to the authorization presented by the insolvency administrators of the company, which is located “in XXXXXXXX”.

FOURTH: SPHERE CAPITAL notified this Spanish Agency for the Protection of Data the designation of a DPO, who was registered in the corresponding list in date 04/12/2019, having been removed from said registry on 06/03/2020, to request of said entity.

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.

Article 63.2 of the LOPDGDD determines that: "The procedures processed by the Spanish Agency for Data Protection will be governed by the provisions of the 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.

II

Article 64.2.f) of the LPACAP establishes that the agreement to initiate a

The sanctioning procedure will be notified to the interested party, stating in said

notification that, if you do not make allegations about the content, it may be

considered motion for a resolution when it contains a precise pronouncement

about the imputed liability.

“f) Indication of the right to make allegations and to be heard in the procedure and of the

deadlines for its exercise, as well as the indication that in case of not making allegations in

the term established on the content of the initiation agreement, it may be considered

motion for a resolution when it contains a precise pronouncement on the

imputed responsibility”.

In this case, the agreement to initiate the sanctioning procedure referred to

this article, warning the entity claimed about the consequences of not

make claims. Said Agreement contains a precise pronouncement on the

responsibility of the claimed entity: the offending conduct is specified, the type

sanctioning entity in which it was subsumable, the circumstances of the responsibility

described and the sanction that, in the opinion of the AEPD, should be imposed, without prejudice to what

result of the instruction.

Thus, in consideration of the foregoing and in accordance with the provisions of article

64.2.f) of the LPACAP, the agreement to initiate this proceeding was considered

Resolution Proposal, since said initial agreement was notified to the

claimed and it has not submitted a brief of arguments.

III

In the present case, the claim made questions the actions of the entity

claimed in relation to the following four issues:

. The lack of designation of a data protection delegate.

. Not having carried out an impact assessment.

. Not having a code of conduct.

. An alleged communication to third parties of personal data relating to the claimant.

It should be noted in this regard that the claimant only provided documentation

in relation to the matter mentioned in point 4 above.

That being the case, the claim must be rejected in relation to the fact that the

claimed does not have an impact assessment related to data protection,

because it is not possible to admit generic claims that do not provide any indication of

infringement.

Regarding the provision of a code of conduct, it should be specified that the article

40 of the RGPD does not configure this issue as an obligation of those responsible and

in charge of the treatment, nor the breach of the provisions of this article

classifies as an infringement in article 83 of the RGPD.

In relation to the last issue mentioned, on the alleged improper communication

of the personal data referred to by the claimant in his writing, it is not

possible to assess the existence or not of this possible illicit communication of the data,

taking into account the confidentiality requested by the claimant regarding his

claim. The impossibility of communicating to the claimed person the identity of the person and

of the alleged facts would prevent the person responsible from presenting the allegations and using

the means of defense that it deems appropriate. The right to presumption of

innocence, recognized in article 24 of the Spanish Constitution, must govern without

exceptions in the sanctioning system and must be respected in the imposition

of any sanctions, since the exercise of the ius puniendi in its various

manifestations is conditioned to the game of the test and to a procedure

contradictory environment in which their own positions can be defended.

Consequently, it is appropriate to analyze only the question relating to the obligation to

the claim to appoint a data protection officer.

IV

Article 37 of the RGPD, whose rubric is entitled "Appointment of the delegate of

data protection" provides that:

"1. The person in charge and the person in charge of the treatment will designate a delegate of protection of

data provided that:

a) the treatment is carried out by a public authority or body, except the courts that

act in the exercise of their judicial function;

b) the main activities of the person in charge or the person in charge consist of operations of

processing that, due to its nature, scope and/or purposes, require observation

habitual and systematic large-scale data subjects, or

c) the main activities of the person in charge or the person in charge consist of the treatment to

large-scale special categories of data under article 9 or personal data

relating to convictions and criminal offenses referred to in article 10.

2. A business group may appoint a single data protection delegate provided

that is easily accessible from each establishment.

3. When the person in charge or the person in charge of the treatment is an authority or organization

public, a single data protection delegate may be appointed for several of these

authorities or bodies, taking into account their organizational structure and size.

4. In cases other than those referred to in section 1, the person in charge or the person in charge of the

treatment or associations and other bodies representing categories of

Those responsible or in charge may designate a data protection delegate or must

designate it if required by the law of the Union or of the Member States. The delegate of

data protection may act on behalf of these associations and other organizations that

represent managers or managers.

5. The data protection delegate will be appointed according to their qualities

professionals and, in particular, to their specialized knowledge of law and practice in

matters of data protection and their ability to perform the functions indicated in

article 39.

6. The data protection delegate may be part of the staff of the person in charge or of the

in charge of the treatment or perform its functions within the framework of a contract of

services.

7. The person in charge or the person in charge of the treatment will publish the contact details of the delegate

of data protection and will communicate them to the control authority".

And, by virtue of the authorization conferred by section 4 of the previous precept, the

Article 34 of the LOPDGDD determines, in relation to the appointment of a delegate

of data protection, the following:

"1. Those responsible and in charge of the treatment must designate a delegate of

data protection in the cases provided for in article 37.1 of the Regulation (EU)

2016/679 and, in any case, in the case of the following entities:

[…]

h) Investment services companies, regulated by the Stock Market legislation

Values.

[…]

2. Those responsible or in charge of the treatment not included in the previous paragraph may voluntarily designate a data protection delegate, who will be subject to the regime established in Regulation (EU) 2016/679 and in this organic law.

3. Those responsible and in charge of the treatment will communicate within ten days to the Spanish Agency for Data Protection or, where appropriate, to the regional authorities of data protection, designations, appointments and dismissals of the delegates of data protection both in the cases in which they are obliged to designate as in the case where it is voluntary.

4. The Spanish Data Protection Agency and the regional protection authorities of data will maintain, within the scope of their respective competences, an updated list of data protection delegates that will be accessible by electronic means.

5. In the fulfillment of the obligations of this article, those responsible and in charge of the treatment may establish the full or part-time dedication of the delegate, between other criteria, depending on the volume of processing, the special category of data

treaties or the risks to the rights or freedoms of the interested parties".

The aforementioned precepts establish the obligation of those responsible and in charge of treatment, in certain cases, of designating the figure of the delegate of Data Protection. In the cases that concern a business group, it is allowed the possibility of appointing a single data protection delegate, whenever it is accessible from each establishment. This figure must meet the requirements

determined in article 37.5 of the RGPD and 35 of the LOPDGDD, will hold the position that is included in article 38 of the RGPD and 36 of the LOPDGDD and will perform the functions established in article 39 of the RGPD.

The mandatory assumptions will be those listed in article 37.1.a), b) and c) and when so required by the Law of the Union or of the Member States. In this sense, the LOPDGDD has established, in its article 34, a list of entities that, acting as responsible or in charge, they will be obliged to designate a delegate of data protection.

With regard to the specific case that is the subject of this proceeding, as stated in the the data held in the Mercantile Registry, the corporate purpose of the company claimed was the development of the activities allowed to the Securities Agencies, such as investment services companies, by article 143 of the Consolidated Text of the Stock Market, approved by Royal Legislative Decree 4/2015, of October 23.

The aforementioned precept provides the following:

“The following are investment services companies:

a) Securities companies.

b) Securities agencies.

c) Portfolio management companies.

d) Financial advisory companies”.

In turn, in the Report included in the last annual accounts presented by the company, those relating to the 2018 financial year (which are included in the actions), It was expressly stated that “The Company is governed by its Bylaws, by the Royal Decree 217/2008, of February 15 on the Legal Regime of the companies of investment services and other entities that provide investment services and their successive modifications, by Royal Decree 4/2015 of October 23 (Text recast of the Securities Markets Law) and by the various circulars of the

National Securities Market Commission that develops it".

Regarding the activity carried out, the Report itself states:

"The Company's exclusive corporate purpose is the development of the activities permitted to

Securities Agencies as investment services companies established by the Real

Decree 217/2008, of February 15, on the legal regime of service companies

investment.

The activities contemplated in its corporate purpose may be carried out by the Company,

in accordance with the applicable regulations, both nationally and internationally

(according to the regulations in this regard), these being the following:

Investment Services:

- The reception and transmission of client orders in relation to one or more instruments

financial.

- Execution of said orders on behalf of clients.

- Discretionary and individualized management of investment portfolios in accordance with the mandates

conferred by customers.

- Placement of financial instruments not based on a firm commitment.

- Investment advice.

Auxiliary services:

- Custody and administration on behalf of clients of the instruments provided for in the RD

217/2008, of February 15.

- Advising companies on capital structure, industrial strategy and issues

as well as advice and other services in relation to mergers and acquisitions

of companies.

- The preparation of investment reports and financial analyzes or other forms of

general recommendation regarding operations on financial instruments.

- Foreign exchange services related to the provision of investment services.

Investment/auxiliary services on instruments not contemplated in article 2 of the

TRLMV:

- Reception and transmission of orders on behalf of third parties in pension plans

(Article 4.1. of RDL 1/2002).

- Advice on investments in pension plans (Article 4.1. of RDL 1/2002).

- The promotion of pension plans (Article 4.1. of RDL 1/2002).

- Discretionary management of portfolios with pension plans (Article 4.1. of RDL 1/2002).

Activities that involve extension of the business:

- Training activity: Courses and training sessions on markets and products

as well as the strategies and tools necessary to function in the

world of financial markets.

Therefore, and despite what was stated by the respondent in his letter of 09/07/2020,

of reply to the transfer of the claim, it is clear that the company was a

"Securities Agency" that held the status of investment service company and

would therefore be obliged to appoint a data protection delegate, since

which is included in the assumption included in article 34.1.h) of the LOPDGDD before

transcribed.

This designation of the data protection officer and his contact details must

be published and communicated to this Data Protection Agency in accordance with

article 37.7 of the RGPD and article 34.3 of the LOPDGDD.

In this case, despite the full applicability of the GDPR since 05/25/2018 and the

validity of the LOPDGDD since 12/07/2018, it is stated that the claimed entity does not

fulfilled the obligations indicated above until 04/12/2019,

date on which the DPO designated by it was included in the register

corresponding, whose appointment had been agreed on 03/30/2019.

Consequently, in accordance with the exposed evidence, available in the

moment in which the opening of the procedure takes place, the aforementioned facts

a violation of the provisions of article 37 of the RGPD, in relation to article

34 of the LOPDGDD, which gives rise to the application of the corrective powers that the

Article 58 of the aforementioned Regulation grants the Spanish Agency for the Protection of

data.

v

In the event that there is an infringement of the provisions of the RGPD, between the

corrective powers available to the Spanish Data Protection Agency,

as a control authority, article 58.2 of said Regulation contemplates the

following:

“2 Each control authority will have all the following corrective powers indicated below:

continuation:

(…)

b) send a warning to any person responsible or in charge of the treatment when the

treatment operations have violated the provisions of this Regulation;”

(...)

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

comply with the provisions of this Regulation, where appropriate, of a given

manner and within a specified time;

(…)

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;".

According to the provisions of article 83.2 of the RGPD, the measure provided for in letter d)

above is compatible with the sanction consisting of an administrative fine.

Without prejudice to the provisions of article 83, the aforementioned GDPR provides for the possibility of

punish with a warning, in relation to what is stated in Considering 148:

“In the event of a minor offence, or if the fine likely to be imposed constituted a

disproportionate burden for a natural person, instead of sanction by fine can

impose a warning. However, special attention must be paid to the nature,

gravity and duration of the infraction, to its intentional nature, to the measures taken to

mitigate the damages suffered, the degree of responsibility or any infraction

previous pertinent, to the way in which the supervisory authority had knowledge of the

infraction, to the fulfillment of measures ordered against the person in charge or in charge, to the

adherence to codes of conduct and any other aggravating or mitigating circumstance”.

SAW

Failure to comply with the provisions of articles 37 of the RGPD and 34 of the

LOPDGDD, supposes the commission of an infraction typified in section 4.a) of the

article 84 of the RGPD, which under the heading “General conditions for the imposition

of administrative fines” provides the following:

"4. Violations of the following provisions will be sanctioned, in accordance with the

section 2, with administrative fines of a maximum of EUR 10,000,000 or, in the case of a company, of an amount equivalent to a maximum of 2% of the total annual turnover of the previous financial year, opting for the highest amount:

a) the obligations of the person in charge and the person in charge pursuant to articles 8, 11, 25 to 39, 42 and 43; [...]".

In this regard, the LOPDGDD, in its article 71 establishes that "They constitute infractions the acts and behaviors referred to in sections 4, 5 and 6 of the Article 83 of Regulation (EU) 2016/679, as well as those that are contrary to the present organic law".

For the purposes of the limitation period, article 73, letter v), of the LOPDGDD indicates:

"Based on the provisions of article 83.4 of Regulation (EU) 2016/679, they 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:

v) Failure to comply with the obligation to appoint a data protection officer when their appointment is required in accordance with article 37 of Regulation (EU) 2016/679 and the article 34 of this organic law".

In the present case, it is considered appropriate to address a warning to the respondent, in accordance with the provisions of article 58.2 b) of the RGPD, in relation to the indicated in Considering 148, cited above.

It is taken into account, in particular, that, according to what appears in the Annual Report and in the Audit Report that accompanies the annual accounts corresponding to the financial year 2019, the company responsible was intervened by the CNMV from 20

March 2020 and requested the voluntary bankruptcy, finding

currently “in XXXXXXXX”, according to the information available in the

Central Mercantile Registry; and is deregistered from the Registry of the Commission

National Securities Market, by voluntary waiver of the authorization submitted

by bankruptcy administrators.

On the other hand, the infringement may lead to the imposition of the person responsible for the

obligation to adopt measures to adjust its actions to the aforementioned regulations

in this act, in accordance with the provisions of the aforementioned article 58.2 d) of the RGPD,

according to which each control authority may "order the person in charge or in charge

of the treatment that the treatment operations comply with the provisions of the

this Regulation, where appropriate, in a certain way and within a

specified period […]”.

However, for the same reason stated, that is, considering the cessation of activity

of the claimed, it is not considered appropriate in this case, the application of the provisions of

the aforementioned article 58.2 d) of the RGPD.

Therefore, in accordance with the applicable legislation and having assessed the criteria for

graduation of sanctions whose existence has been proven,

the Director of the Spanish Data Protection Agency RESOLVES:

FIRST: ADDRESS A WARNING to the entity SPHERE CAPITAL AGENCY

OF SECURITIES, S.A. (in XXXXXXXX), with CIF A04791943, for an infraction of the

article 37.1 of the RGPD in relation to article 34.1 of the LOPDGDD, typified in

article 83.4 of the RGPD and article 71 of the LOPDGDD, and classified as serious to

effects of prescription in article 73, letter v), of the LOPDGDD.

SECOND: NOTIFY this resolution to the entity SPHERE CAPITAL

SECURITIES AGENCY, S.A. (in XXXXXXXX).

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 in accordance with art. 48.6 of the

LOPDGDD, and in accordance with the provisions of article 123 of the LPACAP, the

Interested parties may optionally file an appeal for reconsideration before the

Director of the Spanish Agency for Data Protection within a month from

counting from the day following the notification of this resolution or directly

contentious-administrative appeal 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.

Finally, it is pointed out that in accordance with the provisions of art. 90.3 a) of the LPACAP,

may provisionally suspend the firm resolution in administrative proceedings if the

The interested party expresses his intention to file a contentious-administrative appeal.

If this is the case, the interested party must formally communicate this fact by

writing addressed to the Spanish Agency for Data Protection, presenting it through

Electronic Register of the Agency [https://sedeagpd.gob.es/sede-electronica-

web/], or through any of the other registers provided for in art. 16.4 of the

aforementioned Law 39/2015, of October 1. You must also transfer to the Agency the

documentation proving the effective filing of the contentious appeal-

administrative. If the Agency was not aware of the filing of the appeal

contentious-administrative within a period of two months from the day following the

notification of this resolution would end the precautionary suspension.

Sea Spain Marti

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