

938-0419

Procedure No.: PS/00365/2018

RESOLUTION OF PUNISHMENT PROCEDURE

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

BACKGROUND

FIRST: On May 18, 2018, entry is registered in this Agency

claim made by Mr. A.A.A., on behalf of the Trade Union Section of the

General Confederation of Labor of the City Council of Parla, (hereinafter, the

claimant), against the City Council of Parla, (hereinafter, the claimed), for

violation of the right of confidentiality by maintaining, for quite some time,

at the headquarters of the Department of Social Services of that City Council, located in

the Center "****CENTRO.1", located at ***ADDRESS.1 of Parla, the following situation:

"social workers, educators, mediators and psychologists share
office at the same time that they take care of the families of Parla", which has been happening
Despite having repeatedly communicated to the management of the service the discomfort
derived from "simultaneously serving two families at the same time in each office,
"so that" a neighbor can be listening to the life of another ".

SECOND: On June 18, 2018, the claim was transferred

presented in May 2018 to the Social Services Center "****CENTRO.1" of Parla,

(hereinafter CDCH), requiring you in relation to the same answer to

certain extremes.

In response to which, on July 19, 2018, it is registered as

entry into this Agency in writing from the Chief of the Mayor's Office indicating that

have given the necessary orders so that the competent Department

study and take appropriate measures to remedy the situation. said writing
It is accompanied by the reports issued by the Data Protection Delegate of the
City Council and by the Director of Social Services City Council of Parla in
relation to the facts presented.

The Director of Social Services of the City Council of Parla indicates in this regard that
the situation described is linked to a greater citizen demand for services
from the arrival of the economic crisis, which has caused in the
last 4 years a reorganization of the resources of the Department to give
priority to the immediate attention to the citizen, increasing for it the number of
appointments established in the agendas of the technicians, and therefore the joint use of
the spaces available.

This situation affects the work of different direct care professionals
that share space (offices with 2 tables separated by screens). For another
On the other hand, the loss of municipal spaces allocated to the Department of Welfare
Social forces the concentration of professionals in the available centers,
producing a problem of availability of individual offices.

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The proposals made by the Management of the center to solve
existing space problems (adaptation of existing infrastructures or
rental/new center construction) have been conditioned by the application of the
municipal budget and compliance with the principles of financial sustainability and
budget stability.

He argues that "In February 2018, it was raised, by the Directorate of the Center, to the workers of the department, the study of a proposal that would allow to give a partial solution to the problems of care simultaneous to the citizens, from a new organization of the agendas and days of attention of professionals who share offices, in such a way that the attention of users of the 2 technicians of the same space. This proposal supposes an important change in the organization of work that had been developing at the introduce modifications to already consolidated processes. This proposal was not accepted by the workforce at the meeting held in March 2018, so it was not implemented. “.

Indicates that a project is under study for the reform of a local municipal property for its adaptation as a social services center, which was transferred on 06/01/2018 to the Department of Urban Planning for study and feasibility, as well as the provisional measure consisting of relocating part of the staff from the department to another center to reduce the problem of spaces in the CDCH without affect its current functioning and organization. Alternatives and proposals that have been analyzed in the meetings held by the Directorate of the CDCH in March and April 2018 with representatives of the different sections unions.

It is noted that a copy of this report was sent to the union mail claimant at City Hall.

THIRD: On October 25, 2018, entry is registered in this Agency new claim formulated by the claimant through Don B.B.B., in which reiterate the facts stated.

FOURTH: On March 21, 2019, the Director of the Spanish Agency for Data Protection agreed to initiate a sanctioning procedure of WARNING,

to the CITY COUNCIL OF PARLA, for the presumed infraction of article 32.1.b) of the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, regarding the protection of natural persons with regard to the treatment of personal data and the free circulation of these data, (hereinafter RGPD), in its in relation to the provisions of article 5.1.f) of the RGPD, typified in article 83.4.a) of the RGPD, in accordance with the provisions of article 58.2.b) of the same standard. Likewise, in said initial agreement it was indicated that, if the existence of infringement, for the purposes provided in article 58.2.d) of the RGPD the corrective measure that could be imposed on the defendant in the resolution that is adopted would consist of ORDERING the adoption of technical and organizational measures adequate to guarantee the security and confidentiality of the data processed in the spaces in which citizens are served. This measure should be taken where appropriate, within the period indicated, counting from the business day following that of the notification of the sanctioning resolution, and the means of proof must be provided proof of compliance.

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FIFTH: Notification of the aforementioned initiation agreement, dated April 10, 2019 on

The defendant filed a brief with allegations requesting the dismissal of the procedure based, in short, on the following points:

-It is argued that the economic situation of the defendant, and the length of the deadlines administrative, has caused that at the present time they have not been closed completely the problems of lack of confidentiality that gave rise to the procedure sanctioning Without prejudice to which it is maintained that substantial progress has been made in its resolution, estimating that within a period of three months said measures may be completed (first fortnight of July 2019).

- Attached is a report issued on April 4, 2019 by the Director of

Social Services highlighting the provisional measures implemented in the CDCH and describing the measures whose implementation is expected to be completed by the first fortnight of July 2019. Such measures are considered provisional until that the situation of the claimed person allows budgetary provision for the definitive study of the feasibility of a new center to decongest social services currently loaned.

SIXTH: On July 10, 2019, a resolution proposal is formulated in the sense that by the Director of the Spanish Agency for Data Protection imposed on the City Council of Parla, in accordance with the provisions of article 58.2.b) of the RGPD, a sanction of Warning for the commission of an infringement of the article 32.1.b) of the RGPD in its relationship with the provisions of article 5.1.f) of the same rule, typified in article 83.4.a) of the RGPD.

Likewise, it was proposed, in accordance with the provisions of article 58.2.d) of the RGPD, that if the correction of the irregular situation in the

At the time of the resolution, the Director of the Spanish Agency for Data Protection order the respondent to apply the necessary measures to correct the lack of

confidentiality that affects the processing of personal data of the citizens who are attended in the offices or spaces of shared use of the

Social Services Center "****CENTRO.1". For which, the claimed party must, in the period of one month from the day following the notification of the resolution of the procedure, communicate and/or accredit before this Agency:

☐

The effective implementation of technical and organizational measures necessary to guarantee an adequate level of security against the risk of leakage or improper access by non-interested third parties to the personal data of the citizens who are treated at the CDCH, regardless of whether they also

may be users of social services, in order to guarantee the confidentiality of such information.

☐ Submit documentation or any means of proof that allows prove the execution by the defendant of the actions detailed in the report of dated April 4, 2019 attached to the pleadings brief in order to avoid the use common to offices where professionals serve citizens.

SEVENTH: Notification of the aforementioned resolution proposal, dated July 18, 2019

a written statement of the claimant's allegations is registered in this Agency indicating attached report from the Director of Social Services regarding the status of

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execution of the technical and organizational measures that were being adopted to guarantee the security and confidentiality of personal data in the spaces of shared use of the CDCH in which the professionals attended, individually and/or relatives, to the citizens who attended said headquarters.

In said report, as preliminary questions, it is pointed out that the tasks of conditioning of the necessary centers to be able to transfer to different professionals from the CDCH to the center of ***ADDRESS.2 and, subsequently, carry out the allocation of individual offices, have been delayed due to the election of the most suitable dates so that its realization, carried out with minors inconveniences for professionals, who will enjoy their vacations, and avoiding dysfunctions to citizens who attend with less influx in the period summer, with its completion scheduled for the first fortnight of September 2019.

Regarding the proposed measures, the actions to be carried out in the aforementioned centers in the second half of July and August. It is indicated that at Throughout the month of August, six professionals from the CDCH will join the center of ***ADDRESS.2, where they will have an individual office for guarantee confidentiality in the care provided, in such a way that throughout the first fortnight of September all of them will be incorporated into the new center.

In turn, during the months of July and August, service professionals social services of the CDCH will serve in individual offices as they are part of the staff from the resort. It is planned that the tasks of painting and replacing the pavement can be finished by September 2, 2019. They reiterate the measures to be adopted regarding the redistribution of existing spaces in the CDCH, which are specified in adapting the two libraries/meeting rooms for use as offices and transform the seven offices currently in shared use into offices for individual use. This redistribution will guarantee a level of adequate security that prevents the violation of the principle of confidentiality in the processing of personal data of citizens who will be served in offices for individual use by professionals from the service department social of the CDCH.

It is added that according to its planning, the outlined measures will be executed throughout the first fortnight of September 2019 in both centers.

EIGHTH: Of the actions carried out, the following have been accredited facts:

1. With dates May 18 and October 25, 2018, they are registered at this Agency both claims made against the City Council of Parla by representatives of the Trade Union Section of the General Confederation

of Labor of said City Council, in which they state that in the Center

“***CENTRO.1”, located in ***DIRECCION.1 of Parla, violates the principle of confidentiality of the data when dealing with personal information of the citizens who come to the center in offices shared by several professionals.

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2. The report issued on May 18,

2018 from the Department of Social Services of the Parla City Council, in which is indicated:

“The Center ***CENTRO.1 (headquarters of municipal social services) is a building with ground floor where there are 5 individual offices of care for social workers of the so-called Reception Unit and First attention. On the first and second floors are the units of social intervention and the unit for the elderly, floors where different professionals share offices during care. Also in the second floor is the Child Protection Unit that has of individual offices for the care of families. next to these spaces there are 4 multipurpose rooms that are used, if necessary for individual, family and/or group care. next to the spaces indicated there are other individual offices for personnel of direction, technical and administrative support.”

3.

The report issued on April 4, 2015, is included in the procedure 2019 by the Director of Social Services of the Parla City Council in which The provisional measures implemented and/or planned until the the situation of the claimed person allows the study to be budgeted

of the feasibility of a new center to decongest the services

social services currently provided. Said report indicates that:

two

Reform and refurbishment work has been carried out in the Center

located at ***ADDRESS.2 (hereinafter CFN), as an action prior to the

adoption of a series of measures whose implementation is proposed in order to

guarantee the security and confidentiality of personal data in the

spaces in which citizens are served in the Center ***CENTRO.1

(hereinafter CDCH). The proposed measures are the following:

1. Transfer different CDCH professionals to the CFN facilities, which

It has individual offices to guarantee confidentiality in the

attention to individuals and families and the development of the work of the

professionals.

2. Redistribute the existing spaces in the CDCH, both the released offices

like other current spaces of common use, among the professionals who

they are currently affected by a shared use of the same space. Is

redistribution will ensure confidentiality in care for patients

citizens through the availability of sufficient spaces for use

individual.

3. The above measures entail requiring the maintenance services of

municipal buildings and the IT department the execution of a

series of tasks to adapt these spaces to their new use and provide

material and technical means to professionals.

4. Its realization will suppose the partial suspension of the attention to the citizen

during its execution.

It is estimated that within a period of three months they may be completed (first

fortnight of July 2019)”

FOUNDATIONS OF LAW

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By virtue of the powers that articles 55.1 and 2, 56.2, 57.1 and 58.2 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, regarding the protection of natural persons with regard to the treatment of personal data and the free circulation of these data, (hereinafter RGPD), recognize each control authority, and as established in arts. 47 and 48.1 of Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (hereinafter LOPDGDD), the Director of the Spanish Agency for Data Protection is competent to resolve this process.

II

Articles 1 and 2.1 of the RGPD provide the following:

“Article 1. Object

1. This Regulation establishes the rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of such data.
2. This Regulation protects the fundamental rights and freedoms of natural persons and, in particular, their right to data protection personal.
3. The free movement of personal data in the Union may not be

restricted or prohibited for reasons related to the protection of persons

regarding the processing of personal data.

Article 2. Material scope of application

1. This Regulation applies to the treatment in whole or in part

automated processing of personal data, as well as the non-automated processing of data

personal content or intended to be included in a file.”

For these purposes, it is recalled that article 4 of the RGPD, under the rubric

“Definitions”, provides that:

“For the purposes of this Regulation, the following shall be understood as:

1) "personal data": any information about an identified natural person or

identifiable ("the interested party"); An identifiable natural person shall be deemed to be any person

whose identity can be determined, directly or indirectly, in particular by

an identifier, such as a name, an identification number,

location, an online identifier or one or more elements of the identity

physical, physiological, genetic, psychic, economic, cultural or social of said person;

2) "processing": any operation or set of operations carried out

about personal data or sets of personal data, either by procedures

automated or not, such as the collection, registration, organization, structuring,

conservation, adaptation or modification, extraction, consultation, use,

communication by transmission, broadcast or any other form of enabling of

access, collation or interconnection, limitation, suppression or destruction;”

“9) <<recipient>>: the natural or legal person, public authority, service or

another body to which personal data is communicated, whether or not it is a third party.

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However, public authorities that may

receive personal data in the context of a specific investigation in accordance with

with the Law of the Union or of the Member States; the processing of such data by such public authorities shall be in accordance with the rules on data protection applicable to the purposes of the treatment;

10) <<third party>>: natural or legal person, public authority, service or body other than the interested party, the data controller, the person in charge of treatment and of the persons authorized to treat personal data under the direct authority of the person in charge or the person in charge; “

In accordance with the definitions contained in the aforementioned sections 1 and 2 of article 4 of the RGPD in the shared use facilities of the CDCH produces a treatment of personal data of citizens who are attended by the professionals of said center that entails their identification, or makes them identifiable, not only with respect to such professionals but also for the rest of the citizens who can access this information as long as it is not about offices or facilities for individual use.

III

In this proceeding, the defendant is charged with the failure to apply technical and organizational measures necessary to guarantee a level of security adequate to prevent the violation of the principle of confidentiality in the treatment of personal data of the citizens who are attended, in offices and spaces of shared use, by professionals of the department of social services of the CDCH.

This conduct constitutes an infringement of the provisions of article 32.1.b) and 2 of the RGPD, regarding the “Security of the treatment”, establishes that:

"1. Taking into account the state of the art, the application costs, and the nature, scope, context and purposes of the treatment, 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 measures and appropriate organizational measures to guarantee a level of security appropriate to the risk, which in your case includes, among others:

(...)

b) the ability to ensure the confidentiality, integrity, availability and permanent resilience of treatment systems and services;

(...)

2. When evaluating the adequacy of the security level, particular consideration shall be given to taking into account the risks presented by the processing of data, in particular as consequence of the accidental or unlawful destruction, loss or alteration of data data transmitted, stored or otherwise processed, or the communication or unauthorized access to said data. “

Sections 1.f) and 2 of article 5 of the RGPD, under the heading “Principles relating to treatment”, establish that:

"1. The personal data will be:

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c) treated in such a way as to ensure adequate security of the personal data, including protection against unauthorized or unlawful processing and against its loss, destruction or accidental damage, through the application of measures appropriate technical or organizational (“integrity and confidentiality”)

(...)

2. The data controller will be responsible for compliance with the

provided in section 1 and able to demonstrate it (<<proactive responsibility>>)”

Section 2 of the reviewed article

In turn, article 5 of the LOPDGDD, under the heading, "Duty to

confidentiality”, provides that:

1. Those responsible and in charge of data processing as well as all the people who intervene in any phase of this will be subject to the duty of confidentiality referred to in article 5.1.f) of Regulation (EU) 2016/679.
2. The general obligation indicated in the previous section will be complementary of the duties of professional secrecy in accordance with its applicable regulations.
3. The obligations established in the previous sections will remain even when the relationship of the obligor with the person in charge or person in charge had ended of the treatment.

In this case, it is accredited that the information of a nature personal and intimate that has been treated in offices or spaces of use shared by CDCH professionals, and concerning natural persons applicants or beneficiaries of the social services provided in said center, has result accessible to third parties present in those shared spaces in their condition, also, as users of such services. In this way the attention simultaneously to citizens in offices shared by several professionals has not guaranteed the confidentiality of personal information concerning users of those services, since their personal data, together with information referred to aspects of his intimate and family life, have been accessible to the rest of people served in these spaces of common use.

Notwithstanding the existence of difficulties arising from the lack of availability of sufficient facilities to be able to serve in offices individuals the increase in the demand for social services produced in recent

years, as well as the incidence that the lack of resources poses on its resolution.

economic, there is no doubt that in the offices or spaces shared by professionals of the CDCH there has been a treatment of data concerning the natural persons requesting or receiving social services that has violated the principle of confidentiality, and that brought cause of the lack of adoption and implementation by the respondent of the necessary security measures to prevent the personal information processed by the professionals of the center in said dependencies, including aspects that affected privacy personal or family members of the citizens served, could be known by third parties users of those services present in those shared spaces.

The respondent, in his capacity as responsible for said treatment, should have applied, proactively, the technical and organizational measures that were appropriate to assess and guarantee an adequate level of security for the probable risks of diverse nature and seriousness linked to the types of

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processing of personal data carried out that may affect, among others, the principle of confidentiality. For these purposes, it is recalled that articles 24.1 of the RGPD establishes the following regarding the obligations to be fulfilled by the person in charge of the treatment:

“Article 24. Responsibility of the data controller

1. Taking into account the nature, scope, context and purposes of the treatment

as well as the risks of varying probability and severity for the rights and

freedoms of natural persons, the data controller will apply measures

appropriate technical and organizational measures in order to guarantee and be able to demonstrate that the processing is in accordance with this Regulation. These measures will be reviewed and

They will update when necessary.”

It is also stated in the procedure that this common use of spaces by various professionals has been taking place in said center, as can be deduced from the reports submitted to the procedure, at least in the last four years, and has continued happening until the second fortnight of July 2019, moment from of which, and taking advantage of his return from vacation, the incorporation of six professionals from the CDCH to the center located in c/ Fuente Nueva. East move, in turn, will facilitate the redistribution of spaces in the CDCH, allowing transform offices for common or shared use into spaces for individual use once the painting tasks and replacement of the pavement of the center have been completed, early September 2019, without prejudice to the fact that said individual use of dispatches has already been taking place at the CDCH since the beginning of July taking advantage of the greater availability of the same due to the enjoyment of the period holiday by the professionals who provide services in the center.

IV

Sections b), d) and i) of article 58.2 of the RGPD, "Powers", provide the

"2 Each supervisory authority shall have all of the following powers

Next:

corrections listed below:

(...)

b) sanction any person responsible or in charge of the treatment with warning when the processing operations have violated the provisions of this Regulation;"

(...)

"d) order the person responsible or in charge of the treatment that the operations of treatment comply with the provisions of this Regulation, where appropriate, in a specified manner and within a specified period;"

"i) impose an administrative fine in accordance with article 83, in addition to or in
instead of the measures mentioned in this paragraph, depending on the circumstances
of each particular case;

For the purposes of determining the sanction that could entail the
mentioned infraction, the following precepts must be taken into account:

Article 83 of the RGPD, under the heading "General considerations for the
imposition of administrative fines", establishes in section 2.d) that:

"two. Administrative fines will be imposed, depending on the circumstances

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of each individual case, in addition to or as a substitute for the measures contemplated
in 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:

(...)

d) the degree of responsibility of the person in charge or of the person in charge of the
treatment, taking into account the technical or organizational measures that have
applied under articles 25 and 32;"

The aforementioned article 83 states in section 4.a) that:

"4. Violations of the following provisions will be sanctioned, in accordance
with paragraph 2, with administrative fines of a maximum of EUR 10,000,000 or,
in the case of a company, an amount equivalent to a maximum of 2% of the
global total annual turnover of the previous financial year, opting for
the largest 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.”

Article 73.f) of the LOPDGDD provides that: “Depending on what is established in the article 83.4 of Regulation (U.E.) 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 are appropriate to guarantee a level of security appropriate to the risk of the treatment, in the terms required by article 32.1 of the Regulation (EU) 2016/679.

In parallel, article 83.7 of the RGPD establishes that:

“7. Without prejudice to the corrective powers of the control authorities in

Under Article 58(2), each Member State may lay down rules

on whether it is possible, and to what extent, to impose administrative fines on authorities and public bodies established in that Member State.

In turn, regarding the “Regime applicable to certain categories of responsible or in charge of the treatment“, sections 1.c), 2, 4 and 5 of article 77 of the LOPDGDD determine that:

“1. The regime established in this article will be applicable to treatments of which they are responsible or entrusted:

c) The General Administration of the State, the Administrations of the autonomous communities and the entities that make up the Local Administration.

(...)

2. When the managers or managers listed in section 1

committed any of the offenses referred to in articles 72 to 74 of

this organic law, the data protection authority that is competent will dictate

resolution sanctioning them with a warning. The resolution will establish

also the measures that should be adopted to stop the behavior or correct it.

the effects of the infraction that had been committed.

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The resolution will be notified to the person in charge or in charge of the treatment, to the body on which it reports hierarchically, where appropriate, and those affected who have the condition of interested party, if any.

(...)

4. The data protection authority must be informed of the resolutions that fall in relation to the measures and actions referred to the previous sections.

5. They will be communicated to the Ombudsman or, where appropriate, to the institutions analogous of the autonomous communities the actions carried out and the resolutions issued under this article.”

In accordance with the foregoing, the defendant is responsible for the commission of an infringement of the provisions of article 32.1.b) of the RGPD in its relation to the provided in article 5.1.f) of the same rule, typified in article 83.4.a) of the cited legal text and classified as serious for prescription purposes in article 73.f) of the LOPDGDD, and may be sanctioned, in accordance with the provisions of the article 58.2.b) of the RGPD, with a warning.

In this case, the respondent has shown in his writings of allegations the technical and organizational measures adopted in the CDCH in order to guarantee an adequate level of security that prevents the violation of the principle of confidentiality in the processing of personal data of citizens who are treated at that headquarters, and which has involved carrying out a series of actions tending to redistribute the spaces of common use in which the citizens by the professionals of the department of social services of the CDCH in

offices for individual use, and whose completion is scheduled for the first fortnight of September.

In view of which, it is estimated that the respondent has adopted, and are currently being implemented, the technical and organizational measures necessary to guarantee the confidentiality and security of personal data concerning the natural persons served in the offices that were being used jointly by various CDCH professionals, which does not preclude consider responsible for the infraction described to the defendant in view of the facts that have been tested.

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: IMPOSE the PARLA CITY COUNCIL, with NIF P2810600C, of

In accordance with the provisions of article 58.2.b) of the RGPD, a sanction of Warning for the commission of an infringement of article 32.1.b) of the RGPD in its in relation to the provisions of article 5.1.f) of the same rule, typified in the article 83.4.a) of the RGPD.

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SECOND: NOTIFY this resolution to the PARLA CITY COUNCIL, with NIF P2810600C.

THIRD: In accordance with the provisions of article 50 of the LOPDPGDD, the

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

LOPDPGDD, 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.

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Director of the Spanish Data Protection Agency