

□ File No.: PS/00490/2021

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 December 20, 2021, the Director of the Spanish Agency
of Data Protection agreed to initiate a sanctioning procedure against PHARMA
TALENTS, S.L.U. (hereinafter, the claimed party), through the Agreement that is
transcribe:

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File No.: PS/00490/2021

AGREEMENT TO START A SANCTION PROCEDURE

Of the actions carried out by the Spanish Agency for Data Protection
(AEPD) and based on the following

FACTS

FIRST: A.A.A. (hereinafter, the claimant party) dated November 3,
2020 filed a claim with the Spanish Data Protection Agency. The
claim is directed against PHARMA TALENTS, S.L.U. with CIF B86856655 (in
hereafter, PHARMA TALENTS). The grounds on which the claim is based are
following:

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-You have found a database on the Internet in which personal data is included yours and others, including, but not limited to, email, job title, phone etc.

Along with the claim, provide the address of the web page where the claim appears. mentioned database, and screenshot of the result.

(***URL.1)

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), said claim was transferred to the claimed party, to to proceed with its analysis and inform this Agency within a month of the actions carried out to adapt to the requirements set forth in the regulations of Data Protection.

The transfer was sent on 12/16/2021, through the Notification Service Electronic and Electronic Address Enabled, being notified on 12/16/2021.

On 01/15/2021, this Agency received a written response indicating:

-That PHARMA TALENTS is the owner of the web domain ***URL.2, since its creation, being responsible for the treatment with respect to the personal data that is collect through it. This web domain was created by means of a request provision of services, requested by PHARMA TALENTS to the entity EDITIONS XXXXXXXX EMPRESA EDITORIAL, S.L., (hereinafter "XXXXXXX"), being this Entity the one that assumed the responsibility so much of the development, update, maintenance and storage (in particular through Amazon Web Services), of the web domain, as well as the technical security measures applied to the domain, therefore, being under the control of XXXXXXXX the access to the information collected therein.

-Through this web domain, access to information about the sector was allowed health, biotechnology and pharmaceutical. ***URL.2, was configured as a point of online meeting to complement and accompany the debates created in the sector indicated. The use of this domain by PHARMA TALENTS was carried out www.aepd.es

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until the end of 2016, beginning of 2017, leaving the project on stand-by, but continuing the hosting and maintenance of the web, under the services of XXXXXXXX.

-On the occasion of the communication sent by this Agency to PHARMA TALENTS, initiated a new contact with XXXXXXXX by PHARMA TALENTS, in which was requested:

- Immediate deactivation of the domain ***URL.2 to avoid any other access to the information hosted on it.
- Access to the file indicated in the communication from the AEPD, in order to know the number of data holders included in it, as well as the type of data that They are collected.
- Security measures included in the platform, in order to assess the degree of compliance with them, in relation to the personal data included in the same.
- List of access logs that may have been made to the file indicated in the communication from this Agency.
- Copy of the contract for the provision of services that was signed between PHARMA TALENTS

and XXXXXXXX, in the year 2013, by not having a copy of it between the files managed by PHARMA TALENTS.

Following this contact, XXXXXXXX disabled access to the domain and provided a copy of the Excel file, in which it has been possible to verify the number of holders of data included in it, as well as the type of data collected.

-After several additional attempts to obtain from PHARMA TALENTS the rest of necessary information, XXXXXXXX has denied access to this information understanding that, since there is no maintenance of the web domain, they have no obligation to provide the requested information.

-The categories of data that were included in the file are:

- Identification data: name, surnames, email.
- Academic and professional data: training.
- Employment details data: profession, job title, place of work.

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The data collected in the file are contact details of professionals in the sector health, biotechnology and pharmaceutical.

-After receiving the communication from the AEPD, XXXXXXXX was requested to immediate deactivation of the domain, not allowing access to it from then, so the file is no longer accessible to unauthorized third parties.

-PHARMA TALENTS has proceeded to assess the security incident, following the criteria set out in the "Guide for the management and notification of breaches security", approved by the AEPD. After this assessment has not made notification

to the interested parties, given that, from the result of the calculation carried out, no sets forth the obligation in this regard.

THIRD: On February 3, 2021, the application was admitted for processing.

claim filed by the claimant.

FOURTH: The General Subdirectorate for Data Inspection proceeded to carry out of previous investigative actions to clarify the facts in matter, by virtue of the investigative powers granted to the authorities of control in article 57.1 of Regulation (EU) 2016/679 (General Regulation of Data Protection, hereinafter RGPD), and in accordance with the provisions of the Title VII, Chapter I, Second Section, of the LOPDGDD, having knowledge of the following ends:

The complaining party states that it is accessible through internet (URL ***URL.1) a database that includes both your personal data like other people's. As noted, among other data include (...).

The information contained in the information systems is as follows:

Once the claim is received, the AEPD carries out the following actions:

- On December 1, 2020, it is executed, using the search engine of "Google", a search of the name and surnames of the delimited complaining party to the website "****URL.2". Two results are obtained: through the first of them (***URL.3), entitled "(...)" accesses a web page (format "HTML") that contains data from hundreds of professionals in the health sector

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among which are those of the complaining party; the second result (**URL.4), entitled "(...)", provides access to a file in "Excel" format that contains 8713 records with personal data.

- The first of the documents contains (...) of a total of 8714 "members registered".

- The second, a spreadsheet, includes a list of 8713 records with the following "columns": "(...)". For most records the only data that appear are "(...)". The "(...)" field includes dates from April 29, 2013 until November 26, 2020.

- At this first moment, it can also be seen that the website (**URL.2) lacks a privacy policy, being the only document published of a "legal" nature entitled "TERMS AND CONDITIONS GENERAL TERMS OF ACCESS AND USE OF THE WEBSITE" and dated December 1, 2013. This includes a section dedicated to "Security and privacy" with the following content:

"PHARMA TALENTS will reasonably use the means at its disposal to provide security systems that reasonably protect their systems and the data contained therein against deliberate attacks, malware, etc

However, the User understands and accepts the aspects that the provision of services through the Internet given the open nature, decentralized and global of this communications network.

For this reason, PHARMA TALENTS does NOT guarantee the impregnability of its security systems or the privacy of the information housed in the themselves. PHARMA TALENTS excludes, to the fullest extent permitted by Law, any liability of any kind for security failures in the

WEBSITE and the consequences that could derive from them.”

- In relation to the process of collecting personal data, the document of terms and conditions states that "The User will be obliged to guarantee the veracity and accuracy of the registration data entered in the systems of information of PHARMA TALENTS and carry out as many updates of them were necessary." However, it has not been found existence of forms enabled for the introduction of data on the site internet ***URL.2 nor, consequently, the conditions in which they could find the same.

On the existing relationship between the claimed party and the provider

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The provider states the following about the services contracted in relation to the

internet domain ***URL.2:

(...).

On the security measures implemented prior to the data breach

security

The supplier states that “(…)”

Add the provider that “(…).” And he states that he claimed “(…)” as well as that he

proposed “(…)”. In this regard, it concludes that the claiming “(…)”

Attach the provider (…).

About security breach management

In relation to the management of the security breach that is the subject of this report, the

provider declares that:

(...).

On 05/18/2021 and 07/06/2021 the access tests to the

Internet addresses in which the breach of confidentiality has been specified. What

As a result, it is verified that the personal data is no longer accessible in

the manner referred to by the claimant.

According to the information obtained from the Axesor service, the size of PHARMA TALENTS

is "SME (Microenterprise)", the turnover for the year 2020 (latest presented)

is 889,863 euros, and the result for the 2019 financial year is 186,373 euros.

FOUNDATIONS OF LAW

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Competition

By virtue of the powers that article 58.2 of Regulation (EU) 2016/679 of the

European Parliament and of the Council of April 27, 2016 on the protection of

individuals with regard to the processing of personal data and the free

circulation of these data (RGPD) recognizes each control authority, and according to what

established in articles 47 and 48 of the LOPDGDD, the Director of the AEPD is

competent to initiate and resolve this procedure.

II

Previous issues

In the present case, in accordance with the provisions of article 4.1 of the RGPD, it consists

the processing of personal data, since PHARMA

TALENTS carries out, among other treatments, the collection, registration, consultation, of data information of natural persons, such as: name, telephone number, address of email etc

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

Article 4 paragraph 12 of the RGPD defines, in a broad way, the "violations of security of personal data" (hereinafter security breach) as "all those breaches of security that cause the destruction, loss or alteration accidental or illicit of personal data transmitted, conserved or processed in another form, or unauthorized communication or access to said data."

In the present case, there is a security breach of personal data in the circumstances indicated above, categorized as a breach of confidentiality, when have been accessible to any user personal data collected in a database of data.

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It should be noted that receiving a complaint about a security breach does not imply the imposition of a sanction directly, since it is necessary to analyze the diligence of those responsible and in charge and the security measures applied.

The security of personal data is regulated in articles 32, 33 and 34 of the RGPD, which regulate both the security of the treatment, the notification of a violation

of the security of personal data to the control authority, as well as the communication to the interested party, respectively.

III

Article 5.1.f) of the RGPD

Article 5.1.f) "Principles related to treatment" of the RGPD establishes:

"1. The personal data will be:

(...)

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

In the present case, it is stated that the personal data of the complaining party, as well as those of other people, in the PHARMA TALENTS database, were unduly exposed to third parties, violating the principles of integrity and confidentiality.

In accordance with the evidence available in this agreement of initiation of the sanctioning procedure, and without prejudice to what results from the instruction, it is considered that the known facts could constitute a

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infringement, attributable to PHARMA TALENTS, for violation of article 5.1.f) of the GDPR.

Classification of the infringement of article 5.1.f) of the RGPD

If confirmed, the aforementioned infringement of article 5.1.f) of the RGPD could lead to the commission of the offenses typified in article 83.5 of the RGPD that under the

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

"The infractions of the following dispositions will be sanctioned, in accordance with the paragraph 2, with administrative fines of a maximum of EUR 20,000,000 or, in the case of a company, an amount equivalent to a maximum of 4% of the global total annual turnover of the previous financial year, opting for the largest amount:

a) the basic principles for the treatment, including the conditions for the consent under articles 5, 6, 7 and 9; (...)"

In this regard, the LOPDGDD, in its article 71 "Infringements" establishes that

"The acts and behaviors referred to in sections 4, 5 and 6 of article 83 of Regulation (EU) 2016/679, as well as those that result contrary to this organic law.

For the purposes of the limitation period, article 72 "Infringements considered very serious" of the LOPDGDD indicates:

"1. Based on the provisions of article 83.5 of Regulation (EU) 2016/679, considered very serious and will prescribe after three years the infractions that suppose a substantial violation of the articles mentioned therein and, in particular, the following:

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a) The processing of personal data violating the principles and guarantees

established in article 5 of Regulation (EU) 2016/679. (...)"

v

Sanction for the infringement of article 5.1.f) of the RGPD

For the purposes of deciding on the imposition of an administrative fine and its amount,

accordance with the evidence available at the present time.

agreement to initiate sanctioning proceedings, and without prejudice to what results from the

instruction, the infringement in question is considered to be serious, for the purposes of

RGPD and that it is appropriate to graduate the sanction to be imposed in accordance with the following

criteria established by article 83.2 of the RGPD:

As aggravating factors:

-The duration of the infringement, since the data has been exposed for at least 5

years, as well as the number of people affected, which amounts to more than 8,000 people. (Art.

83.2.a)

-Negligence in the infringement, since there was no access control to the Web

where the database was published. PHARMA TALENTS had not hired

maintenance of the web page, nor had he ordered its cancellation to the

finish the project. (Art. 83.2.b)

As mitigating factors:

-The speed of reaction of the person in charge as soon as he became aware of the breach,

ordering the immediate removal of the web database. (Art. 83.2.c)

-Cooperation with the control authority, giving a complete response to the request

of information. (Art. 83.2.f)

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

As aggravating factors:

- The continuing nature of the infringement, since the data has been exposed on the Internet for at least 5 years. (Art. 76.2.a)

As mitigating factors:

-

There is no evidence that PHARMA TALENTS has obtained any benefit from the public exposure of personal data on its website. (Art. 76.2.c)

The balance of the circumstances contemplated in article 83.2 of the RGPD and the Article 76.2 of the LOPDGDD, with respect to the infraction committed by violating the established in article 5.1.f) of the RGPD, allows initially setting a penalty of €2,000.00 (TWO THOUSAND euros).

SAW

Article 32 of the GDPR

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

"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:

a) pseudonymization and encryption of personal data;

b) the ability to guarantee the confidentiality, integrity, availability and

permanent resilience of treatment systems and services;

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

quickly in the event of a physical or technical incident;

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

technical and organizational measures to guarantee the security of the

treatment.

2. When evaluating the adequacy of the security level, particular account shall be taken of

takes 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.

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

certification mechanism approved under article 42 may serve as an element

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

present article.

4. The person in charge and the person in charge of the treatment will take measures to guarantee that

any person acting under the authority of the person in charge or the person in charge and

has access to personal data can only process said data following

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

the Union or the Member States.

In the present case, at the time of the breach, PHARMA TALENT did not
had the appropriate measures in place to prevent personal data from being
collected on its website were accessible to anyone, since they were not even
I needed a username and password to access the information contained therein.

In accordance with the evidence available in this agreement of
initiation of the sanctioning procedure, and without prejudice to what results from the
instruction, it is considered that the known facts could constitute a
infringement, attributable to PHARMA TALENT, for violation of article 32 of the RGPD.

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IV

Classification of the infringement of article 32 of the RGPD

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

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

"The infractions of the following dispositions will be sanctioned, in accordance with the
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; (...)"

In this regard, the LOPDGDD, in its article 71 "Infringements" establishes that

"The acts and behaviors referred to in sections 4,

5 and 6 of article 83 of Regulation (EU) 2016/679, as well as those that result

contrary to this organic law.

For the purposes of the limitation period, article 73 "Infringements considered serious"

of the LOPDGDD indicates:

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

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 an adequate level of security when

risk of treatment, in the terms required by article 32.1 of the

Regulation (EU) 2016/679.

(...)

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Sanction for the infringement of article 32 of the RGPD

For the purposes of deciding on the imposition of an administrative fine and its amount,

accordance with the evidence available at the present time.

agreement to initiate sanctioning proceedings, and without prejudice to what results from the

investigation, the infringement in question is considered to be serious for the purposes of RGPD and that it is appropriate to graduate the sanction to be imposed in accordance with the following criteria established by article 83.2 of the RGPD:

As aggravating factors:

-The duration of the infringement, since the data has been exposed for at least 5 years, as well as the number of people affected, which amounts to more than 8,000 people. (Art. 83.2.a)

-Negligence in the infringement, since there was no access control to the Web where the database was published. PHARMA TALENTS had not hired maintenance of the web page, nor had he ordered its cancellation to the finish the project. (Art. 83.2.b)

As mitigating factors:

-The speed of reaction of the person in charge as soon as he became aware of the breach, ordering the immediate removal of the web database. (Art. 83.2.c)

-Cooperation with the control authority, giving a complete response to the request of information. (Art. 83.2.f)

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

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As mitigating factors:

- There is no evidence that PHARMA TALENTS has obtained any benefit from the

public exposure of personal data on its website. (Art. 76.b)

The balance of the circumstances contemplated in article 83.2 of the RGPD and the Article 76.2 of the LOPDGDD, with respect to the infraction committed by violating the established in article 32 of the RGPD, allows initially setting a penalty of €2,000.00 (TWO THOUSAND EUROS).

viii

IMPOSITION OF MEASURES

Among the corrective powers provided in article 58 "Powers" of the RGPD, in the Section 2.d) establishes that each control authority may "order the responsible or in charge of the treatment that the treatment operations are comply with the provisions of this Regulation, where appropriate, in a certain manner and within a specified period...".

At this stage of the procedure, the imposition of a fine is deemed appropriate. administrative, however, the Spanish Agency for Data Protection, in the resolution that puts an end to this procedure, may order the adoption of measures, as established in article 58.2.d) of the RGPD and in accordance with the derived from the instruction of the procedure, if necessary, additionally to the imposition of an administrative fine.

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Therefore, in accordance with the foregoing, by the Director of the Agency Spanish Data Protection,

HE REMEMBERS:

FIRST: START A SANCTIONING PROCEDURE against PHARMA TALENTS, S.L.U., with CIF B86856655, for the alleged infringement of Article 5.1.f) of the RGPD typified in Article 83.5 of the RGPD

START SANCTION PROCEDURE against PHARMA TALENTS, S.L.U., with NIF B86856655, for the alleged infringement of Article 32 of the RGPD, typified in the Article 83.4 of the RGPD.

SECOND: APPOINT B.B.B. and, as secretary, to C.C.C., indicating that any of them may be challenged, as the case may be, in accordance with established in articles 23 and 24 of Law 40/2015, of October 1, on the Regime Legal Department of the Public Sector (LRJSP).

THIRD: INCORPORATE to the disciplinary file, for evidentiary purposes, the claim filed by the claimant and its documentation, as well as the documents obtained and generated by the Subdirector General for Inspection of Data in the actions prior to the start of this sanctioning procedure.

FOURTH: 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 would be 2,000 euros (TWO THOUSAND euros) for each of the infractions observed, without prejudice to what results from the investigation.

FIFTH: NOTIFY this agreement to PHARMA TALENTS, S.L.U., with CIF B86856655, granting him a hearing period of ten business days to formulate the allegations and present the evidence it deems appropriate. In his writing of allegations you must provide your NIF and the procedure number that appears in the header of this document.

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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, you may recognize your responsibility within the term granted for the formulation of allegations to the this initiation agreement; which will entail a reduction of 20% of the sanction to be imposed in this proceeding. With the application of this reduction, the penalty would be established at 1,600.00 euros, for each of the imputed infractions, resolving the procedure with the imposition of this sanction. (3,600.00 euros in total)

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 its amount. With the application of this reduction, the sanction would be established at 1,600.00 euros, for each of the infractions imputed, (3,600.00 euros in total) and its payment will imply the termination of the process.

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 this case, if it were appropriate to apply both reductions, the amount of the penalty would be established at 1,200.00 euros, for each of the imputed infractions, (2,400.00

euro in total).

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.

In case you chose to proceed to the voluntary payment of any of the amounts indicated above (1,600.00 euros or 1,200.00 euros, for each of the imputed infractions), you must make it effective by depositing it in account no.

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Data Protection in the banking entity CAIXABANK, S.A., indicating in the concept the reference number of the procedure that appears in the heading of this document and the reason for the reduction of the amount to which it avails itself.

Likewise, you must send proof of payment to the General Subdirectorate of Inspection to proceed with the procedure in accordance with the quantity entered.

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

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.

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Director of the Spanish Data Protection Agency

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SECOND: On December 24, 2021, the claimed party has proceeded to payment of the sanction in the amount of 2,400 euros making use of the two reductions provided for in the Start Agreement transcribed above, which implies the acknowledgment of responsibility.

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

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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 as established in art. 47 of the Organic Law 3/2018, of 5

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

hereinafter LOPDGDD), the Director of the Spanish Agency for Data Protection

is competent to sanction the infractions that are committed against said

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

Telecommunications (hereinafter LGT), in accordance with the provisions of the

article 84.3 of the LGT, and the infractions typified in articles 38.3 c), d) and i) and

38.4 d), g) and h) of Law 34/2002, of July 11, on services of the society of the information and electronic commerce (hereinafter LSSI), as provided in article 43.1 of said Law.

II

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

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

"Termination in sanctioning procedures" provides the following:

"1. 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."

In accordance with the above, the Director of the Spanish Agency for the Protection of Data

RESOLVES:

FIRST: TO DECLARE the termination of procedure PS/00490/2021, of

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

SECOND: NOTIFY this resolution to PHARMA TALENTS, S.L.U.

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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

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

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