

□ File No.: PS/00164/2021

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 July 5, 2021, the Director of the Spanish Agency for
Data Protection agreed to initiate a sanctioning procedure against A.A.A. (onwards,
the claimed party), through the Agreement that is transcribed:

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Procedure No.: PS/00164/2021

AGREEMENT TO START A SANCTION PROCEDURE

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

FACTS

FIRST: The SUPERIOR HEADQUARTERS OF POLICE OF CATALONIA (hereinafter, the
claimant) dated January 14, 2021 filed a claim with the Agency
Spanish Data Protection.

The claim is directed against A.A.A. with NIF ***NIF.1 (hereinafter, the claimed one).

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The Minutes sent by the Higher Police Headquarters of Catalonia indicate what

Next:

“By going to these places, users have been forced to provide their data personal information, both in writing and by providing a copy of your documentation identification, to the employees or people who offer this service so that, with said data, they can reserve an appointment with the administration... on 11/24/2020, by police officers assigned to this Unit, an inspection was carried out office in the call center called "**** LOCUTORIO.1", located on Calle ***ADDRESS.1 of Barcelona, in which the existence of numerous client files (handwritten papers, copies of documentation, appointment receipts prior NIE), which were stored in said establishment with the alleged purpose obtaining prior appointments to carry out different procedures, extending in the place the obligatory act of inspection whose copy is attached to the present writing.

Inside the establishment, a precautionary intervention was carried out on 175 leaves with handwritten annotations/photocopies of documentation containing data and 43 backup copies of previous appointments obtained on behalf of others so many citizens, in order to carry out the corresponding procedures police officers with the holders of that documentation.”

The police report includes the statements of the agency worker who, In addition to stating that they do not inform customers, he ensures that they get rid of all the sheets where said data appears by throwing them in the trash.

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), with reference number E/00719/2021, transfer of said claim to the claimed party on February 22, 2021, to proceed with its analysis and report to this Agency within a month, of the actions carried out

carried out to adapt to the requirements set forth in the data protection regulations.

On March 4, 2021, the respondent responded to the aforementioned request alleging the next:

“The Spanish Administration, for general health reasons, does not enable mechanisms so that citizens can have free and preferential access to various services administrative procedures which caused long waits, loss of documents of identification due to expiration and various other administrative complications for citizens.

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It must be specified that it is an office open to the public where any person can freely access and hire (voluntarily) the service they want.

It is impossible for a business to have this type of personal data and of photocopies of identification documents if the client does not request and agree personally the service to be rendered which is impossible to perform if it is not delivered voluntarily the necessary information to carry it out, service of which gave the client a receipt and a copy of the processed and days later it was communicated and came to the premises to pick up his appointment and the documentation delivered by the customer, at no time was any customer documentation kept once finished the provision of the service or procedure; therefore there is neither improper use nor without the express permission of the client.

FOUNDATIONS OF LAW

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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, regarding the protection of individuals with regard to the processing of personal data and the free circulation of these data (General Data Protection Regulation, hereinafter RGPD) recognizes each control authority, and according to what is established in the articles 47, 64.2 and 68.1 of Organic Law 3/2018, of December 5, on Data Protection Personal and guarantee of digital rights (hereinafter LOPDGDD), the Director of the Spanish Data Protection Agency is competent to initiate 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 4 of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, regarding the protection of natural persons in what regarding the processing of personal data and the free circulation of these data

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(General Data Protection Regulation, hereinafter 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 on personal data or sets of personal data, whether 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;"

Therefore, in accordance with these definitions, the collection of personal data constitutes data processing, for which the data controller

Treatment must comply with the provisions of article 13 of the RGPD.

In relation to this matter, it is observed that the Spanish Agency for the Protection of Data is available to citizens, the Guide for the fulfillment of duty to inform (<https://www.aepd.es/media/guias/guia-model-clausula-informativa.pdf>) and, in case of carrying out low-risk data processing, the free tool Facilitates (<https://www.aepd.es/herramientas/facilita.html>).

III

Article 13 of the RGPD, a precept that determines the information that must be provided to the interested party at the time of collecting their data, it has:

"1. When personal data relating to him is obtained from an interested party, the responsible for the treatment, at the time these are obtained, will provide all the information indicated below:

- a) the identity and contact details of the person in charge and, where appropriate, of their representative;
- b) the contact details of the data protection delegate, if applicable;
- c) the purposes of the treatment to which the personal data is destined and the legal basis of the treatment;
- d) when the treatment is based on article 6, paragraph 1, letter f), the interests legitimate of the person in charge or of a third party;

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- e) the recipients or the categories of recipients of the personal data, in their case;
- f) where appropriate, the intention of the controller to transfer personal data to a third party country or international organization and the existence or absence of a decision to adequacy of the Commission, or, in the case of transfers indicated in the Articles 46 or 47 or Article 49, paragraph 1, second paragraph, reference to the adequate or appropriate warranties and the means to obtain a copy of these or to the fact that they have been borrowed.

2. In addition to the information mentioned in section 1, the person responsible for the treatment will facilitate the interested party, at the moment in which the data is obtained personal, the following information necessary to guarantee data processing fair and transparent

- a) the period during which the personal data will be kept or, when it is not possible, the criteria used to determine this period;

b) the existence of the right to request from the data controller access to the personal data relating to the interested party, and its rectification or deletion, or the limitation of its treatment, or to oppose the treatment, as well as the right to portability of the data;

c) when the treatment is based on article 6, paragraph 1, letter a), or article 9, paragraph 2, letter a), the existence of the right to withdraw consent in any time, without affecting the legality of the treatment based on the consent prior to its withdrawal;

d) the right to file a claim with a supervisory authority;

e) if the communication of personal data is a legal or contractual requirement, or a necessary requirement to sign a contract, and if the interested party is obliged to provide personal data and is informed of the possible consequences of not provide such data;

f) the existence of automated decisions, including profiling, to which referred to in article 22, sections 1 and 4, and, at least in such cases, information about applied logic, as well as the importance and consequences provisions of said treatment for the interested party.

3. When the controller plans the further processing of data

personal data for a purpose other than that for which they were collected, you will provide the interested party, prior to such further processing, information on that other purpose and any additional information relevant under paragraph 2.

4. The provisions of sections 1, 2 and 3 shall not apply when and in the to the extent that the interested party already has the information.

For its part, article 11 of the LOPDGDD, provides the following:

"1. When the personal data is obtained from the affected party, the person responsible for the

treatment may comply with the duty of information established in article 13 of Regulation (EU) 2016/679, providing the affected party with the basic information to referred to in the following section and indicating an electronic address or other medium that allows easy and immediate access to the rest of the information.

2. The basic information referred to in the previous section must contain, at less:

- a) The identity of the data controller and his representative, if any.
- b) The purpose of the treatment.
- c) The possibility of exercising the rights established in articles 15 to 22 of the Regulation (EU) 2016/679.

If the data obtained from the affected party were to be processed for the preparation of profiles, the basic information will also include this circumstance. In this In this case, the affected party must be informed of their right to oppose the adoption of automated individual decisions that produce legal effects on him or her significantly affect in a similar way, when this right concurs in accordance with the provisions of article 22 of Regulation (EU) 2016/679.”

IV

For its part, article 32 of the RGPD establishes the following:

"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 ensure confidentiality, integrity, availability and resilience

permanent treatment systems and services;

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

quickly in the event of a physical or technical incident;

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

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

2. When evaluating the adequacy of the security level, particular 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

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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.

v

In this case, this Agency has confirmed that the respondent requires his customers who provide their personal data to reserve an appointment for them processing of documentation from the National Police, without indicating any of the aspects required in article 13 of the RGPD, indicated in the legal basis III, that is, when collecting personal data by the person in charge of the treatment, that is to say the claimed, must inform the owner of the same, of the aspects indicated in said precept as the identity and contact details of the person in charge and, in its case, of his representative; the purposes of the treatment to which the data is destined and the legal basis of the treatment, etc.

Therefore, since the respondent does not comply with the information required in the aforementioned article 13 of the RGPD, it could incur in an infringement of the RGPD.

By virtue of the provisions of article 58.2 of the RGPD, the Spanish Agency for Data Protection, as a control authority, has a set of corrective powers in the event of an infraction of the precepts of the GDPR.

Article 58.2 of the RGPD provides the following:

“2 Each supervisory authority shall have all of the following corrective powers listed below:

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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 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 under article 83, in addition to or instead of the measures mentioned in this section, according to the circumstances of each particular case;"

Article 83.5.b) of the RGPD establishes that:

"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 rights of the interested parties pursuant to articles 12 to 22;"

In turn, article 74.a) of the LOPDGDD, under the heading "Infringements considered mild has:

"They are considered minor and the remaining infractions of a legal nature will prescribe after a year. merely formal of the articles mentioned in paragraphs 4 and 5 of article 83 of Regulation (EU) 2016/679 and, in particular, the following:

a)

Failure to comply with the principle of transparency of information or the right of information of the affected party for not providing all the information required by the articles 13 and 14 of Regulation (EU) 2016/679."

SAW

Second, it is found that the respondent gets rid of all the sheets where such personal data appear by throwing them away, which is a lack of security and privacy measures, in accordance with art. 32 of the GDPR, transcribed in foundation IV, which states that "the person in charge and the person in charge of the treatment will apply appropriate technical and organizational measures to guarantee a appropriate level of security.

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Article 83.4 a) of the RGPD establishes that:

Violations of the following provisions 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 of greater amount:

a) the obligations of the person in charge and of the person in charge pursuant to articles 8, 11, 25 a 39, 42 and 43

In turn, article 73.g) of the LOPDGDD, under the heading "Infringements considered bass has:

“According to article 83.4 of Regulation (EU) 2016/679, they will be considered serious and Infractions that suppose a substantial violation will prescribe after two years. of the articles mentioned therein, and in particular the following:

g) The breach, as a consequence of the lack of due diligence, of the

technical and organizational measures that have been implemented as required

by article 32.1 of Regulation (EU) 2016/679.”

7th

In accordance with the precepts indicated, against the infraction of article 13 could

address a warning, in accordance with article 58.2.b) of the RGPD, when collecting

through said form basic data of the users and consider that the fine

administrative that could fall in accordance with the provisions of article 83.5.b) of the

RGPD would constitute a disproportionate burden for the claimed party, whose activity

principal is not directly linked to the processing of personal data, since it does not

There is evidence of the commission of no previous infringement in terms of data protection.

Likewise, if the existence of an infraction is confirmed, in accordance with the provisions of

the aforementioned article 58.2.d) of the RGPD, in the resolution the claimed party may be ordered,

as responsible for the treatment, the adequacy of the information offered to the

users whose personal data is collected from them to the requirements

contemplated in article 13 of the RGPD, as well as the provision of means of

proof of compliance with the requirements.

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On the other hand, in accordance with the precepts indicated, against the infraction of the

article 32 it is considered 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 the following:

☐ In the present case we are before an unintentional negligent action, but above

significant data that allow the identification of a person (article 83.2 b)

☐ Basic personal identifiers are affected (name, a number

identification, the line identifier), according to article 83.2 g)

By the Director of the Spanish Data Protection Agency,

HE REMEMBERS:

1. START A SANCTIONING PROCEDURE AGAINST A.A.A. with NIF ***NIF.1, of
in accordance with the provisions of article 58.2.b) of the RGPD, for the alleged infringement
of article 13 of the RGPD, typified in article 83.5.b) of the RGPD.

2 START SANCTIONING PROCEDURE A.A.A. with NIF ***NIF.1, of
in accordance with the provisions of article 58.2.b) of the RGPD, for the alleged infringement
of article 32 of the RGPD, typified in article 83.4.a) of the RGPD.

3. APPOINT B.B.B. as Instructor. and as Secretary to C.C.C., indicating that
any of them may be challenged, where appropriate, in accordance with the provisions of the
Articles 23 and 24 of Law 40/2015, of October 1, on the Legal Regime of the Sector
Public (LRJSP).

4. INCORPORATE to the disciplinary file, for evidentiary purposes, the claim
filed by the claimant and the documents obtained and generated by the
General Subdirectorate for Data Inspection in relation to said claim;
all of them are part of the file.

5. THAT for the purposes provided in art. 64.2. b) of Law 39/2015, of October 1 and
article 58.2.b) of the RGPD, it would correspond to direct a WARNING, by the
infringement of article 13 of the RGPD, without prejudice to what results from the instruction.

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6. THAT for the purposes provided in art. 64.2. b) of Law 39/2015, of October 1 and article 58.2.b) of the RGPD, it would be appropriate to impose a penalty of 3,000 euros (three thousand euros) for the infringement of article 32 of the RGPD, without prejudice to what results from The instruction.

7. NOTIFY this Agreement to A.A.A.

with NIF ***NIF.1, indicating

expressly his right to a hearing in the procedure and granting him a term of TEN WORKING DAYS to formulate the allegations and propose the evidence that consider appropriate. In your statement of allegations you must provide your CIF and the procedure number at the top of this document.

8. That, if the existence of an infringement of article 13 of the RGPD is confirmed, the effects provided for in article 58.2 of the RGPD the corrective measure that could prevail over A.A.A. with NIF ***NIF.1, in the resolution, would consist under the provided in article 58.2 d) of the RGPD, the adoption of the necessary measures to update your "Privacy Policy" to current regulations on protection of personal data, -Regulation (EU) 2016/679 (RGPD)-, adapting the information offered to the requirements contemplated in article 13 of the RGPD, and must provide users, prior to the collection of their personal data, all the information required in the aforementioned precept, for which the claimed party must take into account the provisions of article 6 of the RGPD in relation to the legality of the treatment, as well as what is indicated in article 5 of the RGPD in relation to the purpose of the treatment and term of conservation of the data.

Said measures would have to be adopted, where appropriate, within a period of one month computed from the date on which the sanctioning resolution is notified, and must

Proof of compliance must be provided.

9. That, if the existence of an infringement of article 32 of the RGPD is confirmed, informs that, in accordance with the provisions of article 85.1 LPACAP, it may acknowledge their responsibility within the term granted for the formulation of allegations to this initial agreement, which will entail a reduction of 20% of the total penalty to be imposed in this proceeding, equivalent in this case to 600 euros. With the application of this reduction, the sanction would be established at 2,400 euros, resolving the procedure with the imposition of this sanction.

Similarly, you may, at any time prior to the resolution of this procedure, carry out the voluntary payment of the total proposed sanction, in accordance with the provisions of article 85.2 LPACAP, which will mean a reduction of 20% of the amount of the same, equivalent in this case to 600 euros.

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With the application of this reduction, the total sanction would be established at 2,400 euros and its payment will imply the termination of the procedure.

The reduction for the voluntary payment of the penalty is cumulative with the corresponding apply for the acknowledgment of responsibility, provided that this acknowledgment of the responsibility is revealed within the period granted to formulate arguments at the opening of the procedure. The voluntary payment of the referred amount in the previous paragraph may be done at any time prior to the resolution. In this case, if it were appropriate to apply both reductions, the amount of the total penalty would be set at 1,800 euros.

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 (2,400 euros or 1,800 euros), in accordance with the provisions of the Article 85.2 referred to, we indicate that you must make it effective by entering the restricted account number ES00 0000 0000 0000 0000 0000 opened in the name of the Spanish Data Protection Agency at Banco 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 welcomes

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.

Likewise, in accordance with articles 64.2.f) and 85 of Law 39/2015, of 1 October, of the Common Administrative Procedure of the Public Administrations

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(LPACAP), you are hereby informed that if you do not make representations to this agreement within the term

initially, it may be considered a resolution proposal.

You are also informed that according to the provisions of article 85.1 of the LPACAP, may acknowledge its responsibility within the term granted for the formulation of allegations to this initial agreement, being able, in that case, to resolve the procedure with the imposition of the appropriate sanction.

In accordance with the provisions of article 64.2 of the LOPDGDD, the procedure will have a maximum duration of nine months from the date of the initial agreement.

Once this period has elapsed, it will expire and, consequently, the file of performances.

In accordance with the provisions of articles 55, 57.1 and 58.2 of the RGPD, the competence to resolve this Warning Procedure corresponds to the Director of the Spanish Data Protection Agency.

Finally, it is pointed out that in accordance with the provisions of article 112.1 of the LPACAP,

There is no administrative appeal against this act.

Sea Spain Marti

Director of the Spanish Data Protection Agency

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SECOND: On July 31, 2021, the claimed party has proceeded to pay the sanction in the amount of 1,800 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/00164/2021, of in accordance with the provisions of article 85 of the LPACAP.

SECOND: NOTIFY this resolution to A.A.A.

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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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