

(Version in force since 20/05/2019)

At IMPORT ARRASATE, S.A. (hereafter, "IASA"), we take care over the personal data that we process and over compliance with the relevant current legislation.

This Privacy Policy governs the collection and processing by IASA of the personal data that you provide to us as a user of the website accessible via the domain name <http://www.ternuagroup.com> (hereafter, the "WEBSITE"), including services which may be available at any time via the WEBSITE. The aforementioned is without prejudice to the specific provisions established in certain sections, forms or services available on the WEBSITE for the purposes of providing you with relevant information and, where applicable, to gather your consent.

IASA reserves the right to modify the PRIVACY POLICY in order to adapt it to new legislation, case law and/or administrative changes, as well as to practices that IASA may engage in via the WEBSITE at any point, taking into account your rights and interests at all times.

In any event, IASA shall provide you with suitable technical resources so that you may access the PRIVACY POLICY in order to ensure proper compliance with the relevant data obligations that we must fulfil pursuant to current data protection law.

1. Who is the Data Controller?

The Data Controller is IMPORT ARRASATE, S.A., a company with registered address at Arrasate-Mondragón (Gipuzkoa, Spain), Polígono Kataide Musakola, Pabellón 25, listed in the Commercial Register of Gipuzkoa under volume 1.230, folio 104, sheet SS-4.588, with tax identification number (C.I.F.) A-20212775.

If you have any questions relative to the PRIVACY POLICY and/or how we process your personal data, you can contact us at the aforementioned postal address or by sending an email to lopd@ternuagroup.com.

2. How have we obtained your data?

The data we process at IASA have been obtained from you by means of (i) the various forms which you complete while browsing our WEBSITE or through other channels (e.g. registering as a user of the WEBSITE (where applicable), contact forms, job vacancy and/or selection process forms, etc.), or (ii) via email queries sent by you. Where you have provided data pertaining to a third party, you guarantee that you have informed said third party of the PRIVACY POLICY and that you have obtained their authorisation to provide their data to IASA for the purposes indicated further on.

3. What type of data do we process?

IASA processes the data which you have provided to us while browsing the WEBSITE, through the relevant forms that we use to formalise our contact with you and/or via email.

In particular, IASA processes the following categories of data:

- Identity and contact details (e.g. name, surname(s), national identity number (D.N.I.), postal and email addresses, phone number, etc.).

- Usernames and passwords for the registered user of the WEBSITE.
- Internet browsing data (e.g. IP address, visits to web pages, connections to wifi networks, etc.).
- Data on personal characteristics, training, employment, etc. (in the case of applications/job offers and/or selection processes at IASA in which you participate voluntarily).

4. For what purpose do we process your personal data and on what legal grounds?

Your data is processed for the following purposes:

- To manage and process your registration as a user of the WEBSITE, when this is possible.
- To manage your access to and use of the content and services provided by IASA to you through the WEBSITE, including blogs, social networks or any other functionality that may be accessible from the WEBSITE at any time.
- To process and manage requests for information, suggestions, complaints or the exercise of rights made via the WEBSITE or by email.
- To manage your job application or registration for a job offer and your participation in the corresponding selection process.

The processing of your personal data by IASA, pursuant to the applicable regulation, is based on the consent granted by you at the time of collecting the personal data provided voluntarily by you via the corresponding mechanisms on the WEBSITE.

Where the processing of data requires your consent, you may withdraw your consent freely at any time, at no cost, under the terms indicated in section 7 that follows.

5. Who do we share your data with?

Your personal data may be communicated to the following third parties:

- Public bodies and administrations to which IASA is under a legal obligation to communicate your data, where applicable.
- Provided your consent has been granted, to entities of the corporate group of which IASA is a member (duly identified via the following link) for the purposes of dealing with requests and queries and/or sending you marketing communications related to said entities and their respective activities or products.

It is not envisaged that your data will be subject to international transfer.

6. How long will we keep your data for?

In general, your personal data shall be kept until such time as you withdraw your consent for the processing of your data or request its erasure, and for as long as necessary to meet IASA's legal obligations.

In any case, IASA has internal data cleansing policies to control the length of time during which it holds personal data. Said data may be erased when they are no longer required and/or suitable for their original purpose.

Your data will be held for a maximum period of two years for the purposes of managing job applications.

7. What are your rights?

Current data protection law grants you a series of rights relative to your personal data. You may exercise these rights while your data are being processed. Your rights are as follows:

- Access to your data: You have the right to access your data to find out what personal data pertaining to you we hold.
- Request rectification or erasure of your data: Under certain circumstances, you have the right to rectify inaccurate data pertaining to you which we process or to request their erasure when, among other reasons, the data are no longer necessary for their original purpose.
- Request restriction of processing of your data: Under certain circumstances, you have the right to request the restriction of processing of your data. In this case, we will only store your data for the purposes of exercising or defending complaints as set out in current data protection law.
- Portability of your data: Under certain circumstances, you have the right to receive the personal data pertaining to you which you have provided to us. The data will be provided to you in a structured, commonly-used, machine-readable format which can be shared with another data controller.
- Object to the processing of your data: Under certain circumstances and for reasons related to your particular situation, you have the right to object to the processing of your data. In this case, we will cease to process your data except where they must be held on compelling legal grounds or for exercising or defending possible complaints.

You also have the right to withdraw your consent at any time, without prejudice to the lawfulness of processing based on the consent originally provided.

You may exercise these rights in writing to IASA at the address indicated in Section 1 or by emailing lopd@ternuagroup.com.

Lastly, you may submit a complaint to the competent control authority (in Spain, the Spanish Data Protection Agency), particularly where you are not satisfied with the exercise of your rights. You can contact the aforementioned authority via their website: www.aepd.es.

8. Security measures

IASA will at all times process your data in a strictly confidential manner and will uphold the mandatory duty of secrecy, pursuant to the provisions of the relevant data protection legislation. IASA will adopt the necessary technical and organisational measures to guarantee the security of your data and to avoid their alteration or loss, or unauthorised access to these, taking into account the state of the technology used, the nature of the data and the risks to which they are exposed.

9. Cookies policy

You can access the IASA Cookies Policy via the following link .