

THOMIL, S.A. Data Protection Policy

1. Who is responsible for processing your data?

THOMIL, S.A., with corporate address at CTRA. ANDALUCIA KM 18 28320 PINTO (province of MADRID) and Tax ID Number A81765067, is responsible for processing data regarding the different processes involved in the management of our users, customers or suppliers.

For the purpose of our data protection policy, the contact telephone is 916910263 and electronic mail is jesus.acicolla@thomil.es.

2. What type of data about yourself do we have and how have such data been obtained?

The categories of personal data that THOMIL, S.A. processes about its customers and suppliers are:

- ✓ Identification data
- ✓ Postal or electronic addresses
- ✓ Trade information
- ✓ Economic and transaction data

Under no circumstances, we process specially protected data.

All above mentioned data have been obtained directly from you through the sending of a contact form or the submission of a trade offer, contractual proposal, etc. or through your company when providing us with the identification data and other information necessary to carry out the object of the contractual relationship between the parties. You or your company will be responsible for providing us with the updated data in the event of modifications.

3. what is the purpose for us to process your data?

THOMIL, S.A. processes the data provided by the persons concerned with the aim to manage different activities derived from specific procedures referring to sales, after-sales service, management of suppliers, service quality, etc. In this way, we will use your data to carry out some of the following actions:

- a) Sending of information users request through the contact form in our web page or any other means of contact with our company.
- b) Providing potential customers and our customers with offers of products and services that may be of their interest.
- c) Performing the administration, legal and accounts management of our customers and/or suppliers.
- c) Conducting satisfaction surveys, market research, etc. in order to offer you the most appropriate offers, improved service quality, etc.
- e) Staff selection management.
- f) Management of operations with contacts -web users.
- g) Processing rights of those interested in data protection.

We will not develop commercial profiles based on the information provided and consequently, neither will we take automated decisions about you on the basis of a commercial profile.

4. How long will your data be kept?

Personal data regarding natural persons linked to potential customers, customers or suppliers that **THOMIL, S.A.** collects through the various contact forms and/or collection of information will be kept while not requested cancellation by the person concerned. Data provided by our customers and suppliers will be kept during the trade relationship between the parties respecting, in any case, the minimum legal deadlines for the preservation of data depending on the subject matter.

In any case, **THOMIL, S.A.** will keep your personal data for a reasonably necessary period of time, considering our needs to respond to issues or solve problems, make improvements, activate our services and meet the legislation in force. This means that we can keep your personal data for a reasonable period of time, even after stopping using our products or this web page. After this period, your personal data will be deleted from **THOMIL, S.A.** systems.

5. What is the basis of legitimacy for your data processing?

Next, you will find the basis of legitimacy depending on the data processing:

PROCESSING	BASIS OF LEGITIMACY
Accounts management: Management of invoices with customers and/or suppliers	Maintenance, development and monitoring of the contractual relationship between the parties.
Legal management: application of withholding tax, allowances, etc	Maintenance, development and monitoring of the contractual relationship between the parties. Compliance with legal obligations.
Administrative management: Management of logistics, warehouse, deliveries to customers, goods receipt, etc	Maintenance, development and monitoring of the contractual relationship between the parties.
Marketing: Commercial actions on our products or services targeting our customers or those persons who requested information in the past, including conducting satisfaction surveys to our customers.	Free and unambiguous consents of the person concerned (potential customers). We state that the withdrawal of this consent shall, in no case, condition the execution of the contract between the parties. Legitimate interest of the company on the promotion and marketing of products or services similar to those obtained or requested by the persons interested in the past.
Processing of management of operations with contacts – web users	Free and unambiguous consents of the person concerned.
Processing rights of those interested in data protection	Free and unambiguous consents of the person concerned.
Processing of staff selection management	Free and unambiguous consents of the person concerned.

With regard to the referenced basis of legitimacy, you are obliged to provide the personal data. If such data are not provided, your contract will not be executed or the legal obligations from public authorities met.

6. Who will your data be communicated to?

THOMIL, S.A. will never share your personal data with third companies to use such data for their direct marketing actions, unless expressly authorised for that purpose.

We inform you that your data can be provided to Public Administration bodies and relevant authorities in those cases in which THOMIL, S.A. received a legal requirement from those authorities or in the cases that, when acting in good faith, we consider that such action is reasonably necessary to meet a judicial process, to respond to any legal claim or to protect the rights of THOMIL, S.A. or of its customers.

We inform you that your data will not be transferred or communicated to third parties, THOMIL, S.A. being the sole responsible for its processing and custody.

THOMIL, S.A. may provide your personal data to third parties (for example, Internet service providers that help us manage our web page or execute the contracted services, IT support and maintenance companies, logistics companies, business consultancies and tax and accounting consulting, etc). In any case, these third parties shall maintain, at all times, the same security levels as THOMIL, S.A. with regard to your personal data, and, when necessary, shall be linked by legal commitments in order to keep your personal data privately and securely to only use the information following THOMIL, S.A. specific instructions.

7. Which are your rights as the individual concerned?

Any person has the right to have information if THOMIL, S.A. is processing personal data concerning you or not.

Specifically, the persons concerned may request the **right of access** to their personal data, as well as receive them in a common format and machine reading if processing is carried out by electronic means (**portability right**).

Likewise, the persons concerned may request the **right of rectification** of inaccurate data or **suppression** when, among other reasons, the data are no longer necessary for the purposes they were collected.

In addition, in certain circumstances, the persons concerned may request the **limitation of their data processing**, or in certain circumstances and because of their particular situation, the persons concerned may exercise their **right of opposition** to the processing of their data. THOMIL, S.A. will no longer process such data, except for compelling legitimate reasons, or the exercise or defence of possible claims or in those exceptions set by the regulations in force.

Likewise, we inform you that you have the right to withdraw your consent at any time, without affecting the legality of the processing based on the consent before its withdrawal.

Users are also informed that the above-mentioned rights may be exercised at any time by sending a letter to us using the contact details included in Section 1 "Responsible for processing" in this present policy on Data Protection and Privacy of THOMIL, S.A., by attaching a copy of their National Identification Card. Users have also the right to submit a claim before the Spanish Data Protection Agency, particularly when failed to obtain satisfaction in the exercise of their rights.

Spanish Data Protection Agency

C/ Jorge Juan, 6

28001 – Madrid

Tel. 901100099 / 912663517

8. Protection of data of web page Users

In accordance with the regulation in force (UE) 2016/679, THOMIL, S.A. informs that personal data of the web site Users will be processed for the processing activity indicated in each data collection form in our web page by THOMIL, S.A. Such processing of their data will be covered by their own consent. When pressing the "SEND" button, the user consents to the processing of their data by THOMIL, S.A.

Likewise, we inform you that, except in cases of legal obligation or express consent by the user, THOMIL, S.A. will not transfer your data to third parties. (In the event of transfer, inform about which data and who such data will be transferred to).

Users are also informed that, at any time, they may exercise their rights of access, rectification or suppression of their data, as well as having other rights, which are recognised in this present document and governed by Regulation (UE) 2016/679, and should be notified to THOMIL, S.A., CTRA. ANDALUCIA KM 18 28320, PINTO (province of MADRID), e-mail: jesus.acicolla@thomil.es.

On the other hand, in accordance with Law 34/2002, of 11 July, on Information Society and Electronic Commerce Services, THOMIL, S.A. undertakes not to send advertising via electronic mail without having obtained the recipient's prior express authorisation. Users may choose not to receive advertising by checking the appropriate box.

9. Other relevant information about our Privacy Policy

9.1 Security measures

THOMIL, S.A. meets the security levels required by the European and Spanish regulation in force on data protection considering the state of the art, application costs and nature, scope, context and purpose of the described processing, as well as variable likelihood and severity risks for their rights and freedom as a person.

9.2 Processing personal data of minors

Under RGPD UE 679/2016 and RD 1720/2007, minors over the age of 14 can give their consent to the contract of information society services, such as registration in a forum, filling in a contact form, etc. However, THOMIL, S.A. shall be responsible for checking the veracity of the age indicated by the minor. For processing data of minors under 14, that data collection shall always be carried out under the express consent of their parents or legal guardians.

9.3 Modifications to our Policy on Data Protection and Privacy

Occasionally, THOMIL, S.A. shall modify or correct this section on Data Protection Policy for Users, customers and suppliers. Please, check this section regularly to consult the changes that might have been made and in which way those changes may affect you.

9.4 Why is it necessary to accept this Policy on Data Protection and Privacy?

This section on Data Protection Policy for users, customers and suppliers provides you, in an easily accessible manner, with all the necessary information on the typology of data THOMIL, S.A. keeps on its potential customers, customers and suppliers, its purposes, the rights that data protection regulations recognise to users and the way to exercise those rights. Therefore, we consider that users recognise and accept the processing of their personal data, as described in this present policy, when sending their personal data by our contact means voluntarily and/or with the beginning of the business relationship with our company.

This personal information will only be used for the purposes for which it was provided, and specific national or regional regulations have allowed us to do so.

In any case, we inform you that if you refuse to provide us with the data we require, the development of the contractual relationship between the parties could be hindered, with possible serious consequences when offering the services included in the business contract which has been signed by the contracting party.

For further information on this section on Data Protection Policy for THOMIL, S.A. potential customers, customers and suppliers, please, contact the company using the address provided in the first section "Responsible for Processing" and we will be pleased to help you.

10. Applicable Legislation

These present Conditions are to be ruled, at all times, by the European and Spanish Laws on Personal Data Protection and Privacy.