

Cookies and Privacy Policy

PROYECTO CENTINELA S.L.U. (hereinafter CENTINELA), with registered office at C / Sabinar nº2. Bajo, 41 24007 León (Spain), is the owner of this website and the controller of the personal data provided by users via this website.

You are hereby informed and consent to the processing of any data you provide while browsing the website and any data generated by using the website, including, if applicable, any disclosures or international transfers of the data that may take place, for the purposes indicated in the “*Why do we process your personal data?*” section.

If the data provided refers to third party individuals who are not the user, you guarantee that you have gathered these data with the third party's prior consent to communicate their data, and have informed them before providing it about the purposes of the processing, communications and other terms provided in the Information about Data Protection section.

You hereby state that you are above the age of 14. Moreover, if while browsing the website you provide data relating to minors, you, as the parent or guardian of the minor, expressly authorize the processing of these data, including, if applicable, any data concerning health, in furtherance of the purposes described in the information on data protection.

You hereby guarantee the accuracy and truthfulness of the personal data provided, undertaking to keep it duly updated and to notify CENTINELA of any changes.

The use of this website is subject to the Privacy and Processing of Personal Data Policy, to the Conditions of Use and to the Cookies Policy detailed below. Please read them carefully. By accessing this website and using the materials it contains, you acknowledge that you have previously read those policies and terms and conditions, and that you accept them unconditionally.

INFORMATION ABOUT DATA PROTECTION:

CENTINELA takes pains to protect your personal data and process them transparently. To inform you of your rights and enable you to decide how we should process your data, we hereby include information on how we process the data you provide through this website.

Who is responsible for processing your personal data?

Information and/or personal data provided to us, including, if applicable, health information, is included in a file under the management of:

- **Identity:** PROYECTO CENTINELA, S.L.U.
- **Mailing address:** C / Sabinar nº2. Bajo, 41 24007 León (Spain)
- **Contact information for the Data Protection Officer:**
info@seguridadcentinela.es
- **Which information do we keep?**

CENTINELA obtains information about its users. The following data are kept:

- The domain name of the provider (ISP) that gives you access to the network. For example, a user of provider XXX shall be identified with domain xxx.es.
- Time and date of access to our website.
- The Internet address containing the link that directs users to our website.
- Data that enable us to assess you, such as personality data, consumer habits, browsing habits, psychometric data and anonymous resumes.

Why do we process your personal data?

CENTINELA will process the data you provide while browsing and using our website, and the data collected through the corresponding access obtained by recording telephone conversations or other means, including health data, for the following purposes:

- With regard to browsing and using our website, we will process your data to:
 - Offer you more personalized browsing and a better user experience on our website.
 - Prepare statistics about the countries and servers that visit the website most frequently.
 - Identify the busiest times on the website to make the necessary adjustments and avoid access problems.
 - Identify the effectiveness of the different buttons and links that direct users to our server in order to reinforce the ones that offer the best results.
 - Maintain a log of your activity on the website.
- With regard to the forms provided for the purchase, request or pricing of our products, we process your data to:
 - Price and process requests for products offered through this website.
 - Comply with the applicable legal obligations.
 - Conduct statistical studies and calculations, surveys, access analysis and quality control.
- With regard to the contact forms and telephone numbers provided in the website, we process your data to:
 - Process and manage queries and requests you submit through the telephone numbers provided for this purpose.
 - Process and manage any suggestions, complaints or other queries you submit through the corresponding form.
- Furthermore, with regard to any forms on which you have indicated your consent, we process your data to:
 - Send you information and advertising material, including by email, about offers, products, recommendations, services, promotions, gifts and customer loyalty campaigns.
 - Access for marketing them; obtain and store data and access research to adapt our sales offers to your personal profile, irrespective of whether you complete an operation or, if anonymous, your contract has expired; and conduct surveys, gather statistics, analyze access trends and organize draws. In the case of draws, if you are winner we may

- publish your data on this website and process and transfer them to the tax agency in order to issue payment with any anonymous tax withholding.
- Send you electronic newsletters (if you have subscribed through the Subscription Section).

This website is being measured with Google Analytics. Anonymized these solutions use traces on the webpages and anonymous cookies to analyze the information received (for example, number of visits, duration of the visit, behavior on the page, etc.) and, on the basis of the results obtained, use that information to improve the user experience and the digital operational and communication processes.

You will find more information about the privacy policy of **Google Analytics** at http://www.google.com/intl/es_ALL/privacypolicy.html.

How long will we keep your personal data?

The personal data provided will be kept for the length of time determined by the following criteria: (i) legal obligation for retention; (ii) duration of the contractual relationship and any responsibilities derived from that relationship; and (iii) request received from the interested party to erase their data in accordance with the applicable provisions.

What are the legal ground for processing your data?

The legal basis for processing your data for the purposes described in the "*Why do we do process your personal data?*" section is the consent that you have granted us for, among other activities, carrying out sales and marketing actions, including communicating your data to other Group companies or any third parties with which they have entered into collaboration agreements.

Furthermore, the legal basis for processing your data is the execution of the contract that we undertake with you or the application of the pre-contractual measures that you request; as well as compliance with any legal obligations that apply to the CENTINELA.

Lastly, the legitimate interest of CENTINELA in offering you more personalized browsing and, among other things, carrying out our insurance activity, offering you new products adapted to your needs, and creating profiles for actuarial and market analysis purposes.

Who will your data be shared with?

PROYETO CENTINELA S.L.U. may disclose your data exclusively for the purposes indicated in the "*Why do we process your personal data?*" section with other companies belonging to CENTINELA Group (www.seguridadcentinela.es).

Likewise, any company belonging to the CENTINELA Group (www.seguridadcentinela.es), subsidiaries and affiliates, may send personal data to any of the aforementioned companies to maintain a comprehensive and centralized management of the relationship of the interested parties with the different companies of

the CENTINELA Group, and so that the interested parties can benefit from accessing your data through any of the companies, always respecting applicable legislation on personal data protection and without having to notify the interested parties of every first communication made.

Within the framework of the communications indicated in the previous paragraph, international data transfers may be made to third countries or international organizations, which may or may not have an adequacy decision from the European Commission on said matters. International transfers to countries that can not guarantee an adequate level of protection will be exceptional and will only be made if they are essential for the development of your relationship with the company.

What are your rights when you provide us with your data?

Under the terms and scope set forth in current regulations, any person has the right to:

- confirm whether CENTINELA is processing personal data that concerns them, and to access said data and the information related to its processing
- request the correction of inaccurate data
- request the erasure of the data when, among other reasons, it is no longer necessary for the purposes for which it was collected, in which case CENTINELA will stop processing the data except for the exercise or defense of possible complaints.
- request the limitation of the processing of their data, in which case they may only be processed with their consent, except for their conservation and use for the exercise or defense of complaints or with a view to protecting the rights of another natural or legal person or for reasons of important public interest of the European Union or of a certain Member State.
- oppose the processing of their data, in which case CENTINELA will stop processing the data, except for the defense of possible complaints.
- receive the personal data concerning that they have provided to CENTINELA, in a structured, commonly used, and machine-readable format, or request that CENTINELA transmit those data directly to another controller, where technically feasible.
- withdraw the consent granted, where appropriate, for the purpose included in the “*Why do we process your personal data?*” section, without affecting the legality of the processing based on the consent prior to the withdrawal.

These rights of access, rectification, erasure, limitation, opposition and portability may be exercised directly by the data subject or their legal or voluntary representative through the following email: info@seguridadcentinela.es or by writing to the Corporate Office for Data Protection and Privacy. C / Sabinar nº2. Bajo, 41 24007 León (Spain). This notification must include a copy of the data subject's national identity document or any equivalent document proving their identity.

If you decide to exercise these rights exclusively regarding the data required to subscribe to newsletters through the Subscription Section, you may do so by clicking on the following link: [Unsubscribe](#).

We also inform you that you may file a complaint with the Spanish Data Protection Agency, especially if you consider that you have not obtained satisfaction in the exercise of your rights, via the website provided for such purposes by the corresponding supervisory authority.

RESPONSIBILITIES

PROYECTO CENTINELA S.L.U. declines all responsibility regarding the information on this website originating from sources beyond the control of the CENTINELA, as well as any content which it has not created itself.

LEGAL DISCLAIMER

The owner of the domain is PROYECTO CENTINELA S.L.U., with tax ID B 24661290, head office at C / Sabinar nº2. Bajo, 41 24007 León (Spain).

CONDITIONS OF USE OF THE WEBSITE

You undertakes to make good use of the website, with good use meaning in accordance with current legislation, good faith and public order.

You also agree not to use the website for fraudulent purposes, and not to perform any action to damage, disable or overload the website, or to prevent, in any way, its normal use and operation.

You are hereby informed that, in the case of non-compliance with the Conditions of Use, the Privacy Policy or any other terms or conditions contained on the website, CENTINELA reserves the right to limit, suspend or block access to the website using any technical measure that it deems necessary.

Copyright

All rights reserved. The design of the portal and its source codes, as well as the logos, trademarks and other distinctive signs that appear on it, belong to CENTINELA and are protected by the corresponding intellectual and industrial property rights.

The reproduction, distribution, transformation, manipulation, public communication or any other total or partial, free or onerous use of the texts, images or any other content that appears on the website is strictly forbidden without written authorization from the owners of the copyright.

PROYECTO CENTINELA S.L.U. reserves the right to make any changes, variations, deletions or cancellations in the contents and in the form of presentation it deems necessary at any time and without prior notice, either temporarily or permanently, and you must therefore ensure that you are using the latest version at all times. This power does not grant users any right to receive compensation for damages.

COOKIES POLICY

CENITNELA uses cookies to offer you a better browsing experience that suits your needs and to protect and improve the website. Read this Cookies Policy carefully to learn about the responsible use that CENTINELA makes of them and about the options you have to configure your browser and manage them.

What are cookies?

Cookies are small data files that are generated in the user's computer and that allow us to know your frequency of visits, the most selected content and the security elements that may intervene in controlling access to restricted areas, as well as the viewing of advertising based on criteria predefined by CENTINELA and activated by cookies served by said company or by third parties that provide these services on behalf of CENTINELA.

As a general rule, there are the following types of cookies:

- Based on their expiration:
 - Session: They expire when the session ends.
 - Persistency: They do not expire when the session ends.
- Based on their origin:
 - Origin: Enabled by the website you browse.
 - Third party. They come from other websites.
- Depending on their purpose:
 - Technical: they allow the browsing and use of different services.
 - Customization: they allow access to the service with predefined characteristics.
 - Analysis: they allow the monitoring and analysis of user behavior.
 - Advertising: they allow the management of advertising spaces.
 - Behavioral advertising: they allow the management of advertising spaces. They store information about user behavior.

What kind of cookies do we use and for what purposes?

On this website, the following types of cookies are used, with the following purposes:

1. **Analytical cookies**

They are used to collect user activity statistics. Among others, the number of users visiting the website, the number of pages visited as well as the activity of users on the website and their frequency of use are analyzed.
The information collected is always anonymous in such a way that no link can be established between the information and the individual to whom it refers.
2. **Cookies and authentication**

They are used for the maintenance of the user session during each visit, being dominant in private environments of the website that require a user and password for access.
3. **Cookies used by social networks**

They allow the user to share contents of interest with their social network contacts by ticking the corresponding button (plug-in) on the website.
The plug-ins store and access the user's terminal cookies and allow the social network to identify its users when they interact with the plug-ins.

4. **Cookies used by external content add-ons**

They are necessary for the provision of some types of services and are stored by third parties.

Within this category of cookies are, for example, media player cookies, which are used to store technical data in order to play video or audio content, such as image quality, loading parameters, etc.

5. **Third party cookies for the personalization of advertising spaces**

They make it possible to manage the advertising space that the users view when accessing the website, and they are stored by third parties.

Who accesses the cookie information?

The information stored in the cookies is used exclusively by CENTINELA.

Can cookies be deactivated?

Except in the case of analytical cookies, the use of cookies has an effect on the privacy of users since, as a general rule, it makes it possible to relate content to the connecting IP address and other personal data of the user, such as data given voluntarily.

By accepting this Privacy and Cookies Policy, the user will be consenting to the generation of cookies for the purposes mentioned above.

Notwithstanding the foregoing, if the user wishes to subsequently delete the cookies that have been stored on his/her computer and that require consent, he/she may do so using the tools provided by his/her browser for such purposes. The following links explain how to deactivate cookies, depending on the browser used:

- Firefox: <http://support.mozilla.org/es/kb/habilita-y-deshabilita-cookies-que-los-sitios-we>
- Internet Explorer: <http://windows.microsoft.com/es-es/internet-explorer/delete-manage-cookies>
- Chrome: <http://support.google.com/chrome/bin/answer.py?hl=es&answer=95647>
- Safari: http://support.apple.com/kb/HT1677?viewlocale=es_ES
- Opera: <http://help.opera.com/Windows/8.54/es-ES/cookies.html#privacy-cookie>

If the user does not accept cookies or rejects them later, the functionalities of the website may be reduced.

Changes and updates in the Cookies Policy

CENTINELA can amend this Cookies Policy according to legislative or regulatory requirements, or in order to adapt said policy to the instructions and recommendations dictated by the regulators. We therefore recommend that you periodically review the Cookies Policy.