



PRIVACY POLICY

In accordance with **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC** (hereinafter, “**GDPR**”), and with **Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights** (hereinafter, “**LOPDGDD**”), we hereby inform you of our data protection policy.

1. Data controller

Company name:	SEMILLAS FITÓ, SAU
TAX ID NO. (NIF):	A08469215
Postal address:	c/ Selva de Mar, núm. 111 (08019 Barcelona)
Telephone:	+ 34 933036360
Email address:	info@semillasfito.com
Data Protection Officer's (DPO) contact details:	rgpd@semillasfito.com

2. Purpose, legal basis, and data retention period

Below is a table outlining the purpose for which your personal data is processed, that is, the reason Semillas Fitó processes your personal data, along with the legal basis permitting the processing for that purpose and the retention period of your data.

PURPOSE OF THE PROCESSING	LEGAL BASIS	RETENTION PERIOD
Manage your participation in the International Executive Development Program organized by Semillas Fitó jointly with the ESADE Foundation.	Performance of the agreement derived from completing the form provided to participate in the program.	Until the purpose for which the data was collected has been achieved.
Share your data with the ESADE Foundation so that it may evaluate your application and, where appropriate, manage your participation in the program.	Explicit consent given by the data subject.	
If you give us your consent, use your information to provide visibility and promote the International Executive Development Program on Semillas Fitó's social media, website, and specialized industry	Explicit consent given by the data subject.	Until the purposes of the processing mentioned above are achieved, or until the data subject withdraws their consent.



channels where we conduct our activities.		
If you give us your consent, periodically send you informational and/or promotional communications related to Semillas Fitó by electronic means.	Explicit consent given by the data subject.	Until you explicitly notify us of your wish to stop receiving communications.
Manage, where applicable, your rights as a data subject.	Compliance with a legal obligation applicable to Semillas Fitó.	For the time necessary to resolve any requests and/or complaints.

In the event that Semillas Fitó processes your personal data for a purpose other than those listed in the table above, Semillas Fitó will inform you in advance of the new purpose and provide any other relevant information in accordance with applicable law. Where necessary to justify a legitimate processing activity, your consent will also be requested.

Additionally, please note that, beyond the retention periods mentioned above, we will keep your data for the legally required time limits in order to comply with our legal obligations and to manage our rights (such as filing or defending a claim, if applicable), in accordance with our corporate policies regarding document archiving and retention periods.

3. Data recipients: transferees and data processors

We inform you that your data will be **shared** with the ESADE Foundation, located at Avinguda Pedralbes 60-62, 08034 Barcelona, with tax ID G59716761, for the purpose of managing your participation in the International Executive Development Program organized by Semillas Fitó jointly with the ESADE Foundation.

Your data will not be shared with other third parties, except where required by law.

Additionally, we inform you that, in certain cases, your data may be shared with other entities (including companies within the Fitó Group) acting as data processors on behalf of Semillas Fitó. In accordance with Article 28 of the GDPR, a contract has been established to legitimize these entities' access to personal data and to define the obligations that must be observed in processing the data.

International transfers

Semillas Fitó does not carry out international transfers of your personal data.

However, access to your data by Data Processors may necessarily involve the international transfer of data. In any case, such transfers will be carried out based on an adequacy decision (a third country that guarantees an adequate level of protection) or through appropriate safeguards (standard data protection clauses, binding corporate



rules). This information is available to data subjects and can be requested by sending an email to the Data Protection Officer's contact address.

4. Image rights

Within the framework of our Image Rights Policy ("**Policy**"), Semillas Fitó requests your authorization to use images or videos that may be taken or recorded in the context of the International Executive Development Program delivered by the ESADE Foundation.

If the data subject has authorized the transfer of their image rights, the images may be used by Semillas Fitó in accordance with the terms established in the aforementioned Policy.

If consent has not been granted for this purpose, Semillas Fitó commits not to take or publish photographs in which the data subject can be identified. However, to facilitate compliance with the Policy, the data subject is requested, as far as possible, to avoid participating in and/or posing for group photographs.

5. Rights of the data subject

Finally, we inform you that you have the right to obtain confirmation as to whether Semillas Fitó is processing personal data concerning you. You also have the right to access your personal data, request the correction of inaccurate data, or, where applicable, request its erasure when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

In certain circumstances, you may: (i) request the restriction of processing of your data, in which case we will only retain it for the exercise or defense of claims; (ii) object to the processing of your data for reasons related to your particular situation, in which case Semillas Fitó will cease processing your data except for compelling legitimate grounds or for the exercise or defense of possible claims; and (iii) where you have given your consent for a specific purpose, withdraw your consent at any time, without affecting the lawfulness of processing based on the consent given prior to its withdrawal.

You also have the right to receive the personal data concerning you that you have provided to Semillas Fitó in a structured, commonly used, and machine-readable format, and to transmit them to another data controller without Semillas Fitó hindering this process. In this regard, you may request that Semillas Fitó transmit your personal data directly, if technically feasible, to the data controller you indicate in your communication.

Finally, we inform you that you may exercise your rights by sending a request to **Semillas Fitó, SAU** via email at rgpd@semillasfito.com digitally signed (using an electronic ID or other recognized certificate), or by written communication addressed to **Semillas Fitó, SAU**, at Carrer Selva de Mar, No. 111, 08019 Barcelona (Ref. GDPR).

The request must include: your full name; a copy of your national identity document, passport, or other valid identification document, and, if applicable, the identification of your representative along with the document or electronic instrument proving such representation; details of the request being made; an address for notifications; the date and signature of the applicant; and any supporting documents necessary to substantiate



the request. For additional information about your rights, you may visit the website <http://www.agpd.es>

If you believe that the processing of your personal data infringes applicable regulations, or if you are simply not satisfied with the exercise of your rights, you have the right to lodge a complaint with the Spanish Data Protection Agency.