

Privacy policy statement

Data protection policy for clients, contacts and suppliers

Last update: 04/05/2018

Data privacy and confidentiality of information are both important aspects for I ThinkUPC. This data protection policy establishes how we process personal data obtained from our clients, contacts and suppliers. It may vary over time due to potential changes in legislation, jurisprudence, or the criteria applied by the Spanish Agency of Data Protection (AEPD) and/or the competent authority at the time. For this reason, we reserve the right to amend this policy to adapt it to any new legislation or jurisprudence in force when the website is accessed.

1. Identification of the data controller

The controller responsible for processing the data of clients, contacts and suppliers is: I THINKUPC, SL, single-member company; tax identification number (CIF): B66869033; address: c/ Gran Capità, 2-4, edificio Nexus I, planta 0, 08034 Barcelona; contact email:: privacy@ithinkupc.com.

2. Purpose of data processing, legal basis and retention periods

In the company, we process the personal data of our contacts, clients and suppliers for the following purposes:

2.1. POTENTIAL CLIENTS AND CONTACTS: we process the data of potential clients for commercial research activities, the management of offers and quotes, and contracts and their subsequent commercial follow-up.

- The legal basis for processing data is: (1) the consent of the data subject, which is deduced from their previous interest and/or established commercial and/or pre-contractual relationship and acceptance of this policy, and (2) the company's legitimate interest in offering products and services.
- The retention period: data will be retained until the user requests that they are deleted.

2.2. CLIENTS: we process client data to manage the contracted service, and for administrative, financial and accounts management.

- The legal basis for processing data is the existence of a contractual relationship to provide the requested services.

- The retention period: in all cases, data will be retained for the duration of the contractual relationship and subsequently within the legal deadlines established in civil law in relation to contractual obligations, and in accounting and tax law.

2.3. SUPPLIERS: we process data to manage suppliers; e.g. manage contracts, orders, and payments, and maintain a database of contacts for potential future contracts and/or collaboration.

- The legal basis for processing data is the existence of a contractual relationship.
- The retention period: in all cases, the data will be retained for the duration of the contractual relationship and subsequently within the legal deadline established in civil law in relation to contractual obligations, and in accounting and tax law.

2.4. COMMERCIAL ACTIVITY AND MARKETING: the company will process contact data to send commercial communications if it has obtained consent to do so, or a previous contractual relationship exists.

- The legal basis for processing data is consent: when personal data is gathered, the person concerned will be asked to consent to receiving information via email, post, text message or any other channel about the company's products and services. The person concerned may withdraw their consent at any time by stating that they do not wish to receive any more commercial communications, following the instructions indicated at the bottom of every communication sent by the company.

If the person is already a client and/or supplier of the company, the legal basis for processing data is the contractual relationship that has been established, protected by the Information Society Services and Electronic Commerce Act. The communications will be sent via email and the recipient will be given the option to cancel the emails in each communication that is sent.

- Retention period: data shall be retained indefinitely unless the data subject requests its deletion.

3. Recipients of personal data

The company will disclose its data to others in the following cases:

- Legal obligation: to the tax authority for tax payment purposes, and to judges and courts that request data by judicial means.
- Data disclosure required to execute the contracted services: to financial entities to receive and make any necessary payments, insurance companies to manage insurance policies, and debt collection companies to recover debts that have not been paid.

4. Rights of data subjects

Any person has the right to obtain information on the data that are being processed. Below, we specify the user's rights:

- The individuals concerned have the right to access their personal data and to request rectification of incorrect data or deletion of data that are no longer needed for the purposes for which they were gathered, among other reasons.
- In certain circumstances, the individuals concerned can request that the processing of their data is restricted. In this case, data will only be retained to make or defend claims.
- In certain circumstances and for reasons relating to their particular situation, the individuals concerned could oppose the processing of their personal data. The company will stop processing these data, except for overriding legitimate interests or to defend any potential claims.
- Portability: the person concerned shall have the right to receive any personal data about them that they have provided to IThinkUPC, in a structured, commonly used, machine-readable format, when: a) the data processing is based on consent or on a contract, and b) the data processing is undertaken by automated means.

The individuals concerned have the right to make a claim before the supervisory body (AEPD: www.agpd.es) if the rights specified here have been breached.

To exercise the above rights, the person concerned can contact IThinkUPC by post or email at the address indicated in Section 1. In the request, the following information should be given:

1. Applicant information (name and surnames)
2. Contact address
3. Right that the individual wishes to exercise
4. Specific data to which the request refers

Within one month, we will deal with the request and communicate the result via the same channel that the interested party used initially.

5. Security of data processing

Considering the state of the art, the costs of implementation, the nature, scope, context and purposes of data processing and the risks, of varying probability and severity, to the rights and freedoms of individuals, the company shall implement suitable technical and organisational measures to ensure a level of security that is appropriate to the risk. These measures shall prevent the destruction, loss, and accidental or illegal modification of any personal data that are transmitted, retained or processed, or the communication of or unauthorised access to these data.

In relation to the above, we would like to remind you that our services are certified by Aenor with ISO 27001, which ensures the maintenance and continuous improvement of a system for managing information security. The security management system and associated security controls maintain the confidentiality, integrity and availability of information through the implementation of risk management processes, and provide the persons concerned with confidence and peace of mind.