

## PRIVACY POLICY

### 1. Why is the Privacy Policy necessary?

The **General Data Protection Regulation**<sup>1</sup>, published in May 2016 and in force since 25 May 2018 is directly applicable across the entire European Union. In accordance with the principle of transparency, it requires that Data Subjects be made aware of when and how their personal data is processed.

### 2. Who is responsible for processing your personal data?

The Data Controller responsible for processing your data is **Analistas Financieros Internacionales, S.A.** (hereinafter, "Afi"), as the corporate body that decides how and for what purpose data is processed. Afi is a company with Spanish tax ID number (NIF) A78603206. Its contact details are as follows:

- Registered business address: C/ Marqués de Villamejor, 5, 28006 Madrid (Spain)
- Email: [afi@afi.es](mailto:afi@afi.es), [afi-GDPR@afi.es](mailto:afi-GDPR@afi.es)
- Telephone: (+34) 915 200 100
- Fax: (+34) 915 200 121

### 3. Who is the Data Protection Officer?

Afi has appointed a **Data Protection Officer (DPO)** to liaise with the Spanish Data Protection Agency (AEPD) and citizens vis-à-vis data protection matters. You can contact the Data Protection Officer as follows:

- Registered business address: C/ Marqués de Villamejor, 5, 28006 Madrid (Spain)
- Email: [dpo@afi.es](mailto:dpo@afi.es).

### 4. How did we obtain your data?

Afi obtains personal data directly from the Data Subjects. However, sometimes the personal data processed is from other Afi Group companies when it is data that is not subject to special protection.

### 5. What is the purpose of processing your personal data?

Afi processes personal data for various reasons depending on the source of the data.

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<sup>1</sup> 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.

- Contact data. Data obtained through contact forms is processed to handle your enquiries and requests.
- Data on course, seminar, conference and/or workshop participants. Such data is processed to maintain and develop relationships between parties, and to send information on services, training and events of interest offered by Afi.
- Candidate data. Such data is processed to select candidates and, as the case may be, manage their participation in personnel and/or student selection processes, and to send information on services, training and events of interest offered by Afi.
- Staff data. Such data is processed to manage the employment relationship between parties.
- Client data. Such data is processed to provide the contracted service, bill for it and carry out any necessary tasks to provide the service, and enhance the commercial relationship between the parties by sending information on services, training and events of interest offered by Afi.
- Speaker and partner data. Such data is processed to maintain, develop and control relationships between parties, comply with legal obligations, and to send information on services, training and events of interest offered by Afi.
- Supplier data. Such data is processed to place orders and pay for contracted services.
- Data on minors. If the Data Subject is a minor, **prior consent is required from his/her parents or guardians** before his/her personal data can be entered on any form. **Afi assumes no responsibility for not complying with this requirement.**
- Cookie data. Cookies may be used when a User browses the different screens and webpages of our Platform, in order to identify Users and offer them a better and more personalised service. For further information, please consult the *Cookie Policy* available online.

Entirely automatic decisions will not be taken using the person data collected.



## 6. What is the lawful basis for processing your personal data?

The lawful bases for processing personal data will be one of the following, as applicable in each case:

- Data subject's consent as a lawful basis. When the lawful basis for the final purpose of processing personal data is not one of the legal grounds stipulated below, the Data Subject will be asked for his/her consent to process his/her personal data.

- Contract performance as a lawful basis. Where processing is necessary for the performance of a (service-level, employment, administrative, etc.) contract to which the Data Subject is party or in order to take steps prior to entering into a contract. Reference to the contract will be made in the information provided when the Data Subject's data is collected in each specific case.
- Compliance with a legal obligation as a lawful basis. Where processing is necessary to comply with a legal obligation to which the Data Controller is subject, i.e. an obligation under Union or Member State law. To this end, data will be stored to comply, inter alia, with tax, employment and social security laws and regulations.
- Legitimate interest of the Data Controller or a third party as a lawful basis. Where processing is in the legitimate interests pursued by the Data Controller or by a third party, such interests will be specified in the top layer of information (*General information*, provided when the Data Subject's data is collected). Among others, where personal data is processed for direct marketing purposes, it may be deemed there is a legitimate interest, and in those cases where there is a relevant and appropriate relationship between the Data Subject and the Data Controller in situations such as where the Data Subject is a client or in the service of the Data Controller.

## 7. How long will we keep your data?

Personal data provided will be kept and processed as needed for the purpose for which it was collected and as per the lawful basis for processing it in accordance with applicable legislation.

Your personal data may be held while there is a relationship or unless you exercise your right to erase and/or restrict processing your data.

## 8. Do we transfer your data to third parties?

Data **will not be transferred to third parties** except in the following instances:

- Where there is a legal obligation to do so, for example, to the tax or social security authorities, to banks and financial institutions, to public law-enforcement authorities and other similar bodies, and/or to supervisory authorities, etc.
- Transfers to Spanish Afi Group companies to perform administrative and management tasks associated with the aforesaid purposes (human resources, administration, legal affairs, etc.) and that are carried out by the Group's central services.
- Staff data may also be transferred to Group companies' suppliers to manage the payroll and workforce (tax and/or personnel management firms).

Personal data will remain the responsibility of the company provided with said data, irrespective of whether the data was transferred as per the aforementioned terms.

We also hereby inform you that part of the systems used are located in EU and non-EU third countries, and therefore international data transfers occur. Afi has put appropriate measures in place to ensure such data is given the same protection as that required in accordance with the GDPR. In any event, transfers will only be possible if they do not override the Data Subject's rights, freedoms and interests.

## 9. What are your rights?

Data Subjects may exercise free of charge the following rights in relation to the processing of their data:

- Right to request access to personal data.
- Right to ask for data to be rectified or erased when, among other reasons, the data is not required for contract performance.
- Right to request restriction of processing of data, in which case, we will only keep the data to exercise or defend claims or if failure to process the data could result in some form of judicial, legal or contractual liability.
- Right to object to processing, in which case Afi will cease processing the data unless there are compelling legal grounds or to exercise or defend any possible claims, and we will duly lock the data for as long as necessary while any legal obligations remain.
- Right to data portability. A Data Subject may request and receive the data concerning him/her that he/she has provided, or request that the data be transmitted to another data controller of his/her choice, in a structured, commonly used and machine-readable format.
- Right to withdraw the consent given, at any time, without effecting the lawfulness of processing based on prior consent before withdrawal.

To exercise their rights, Data Subjects can send the form attached as an annex ("EXERCISING RIGHTS"), along with a copy of their Spanish ID cards (DNI) or equivalent documents, indicating the right they wish to exercise to the following addresses:

- Email: [afi-GDPR@afi.es](mailto:afi-GDPR@afi.es)
- Postal address: Afi Escuela de Finanzas, S.A.  
C/ Marqués de Villamejor, 5  
28006 Madrid – Spain

Afi Escuela will deal with their requests as soon as possible and, in any event, within a month from receiving the request. That period may be extended by a further two months

where necessary, taking into account the complexity and number of requests. Afi will notify the Data Subject of any extension within the first month of receiving the request.

If a Data Subject is unsuccessful in exercising his/her rights, he/she may contact the **Data Protection Officer** ([dpo@afi.es](mailto:dpo@afi.es)). He/she may also lodge a complaint with the competent data protection authority, without prejudice to taking any legal action. The contact details of the **Spanish Data Protection Agency** are as follows:

- Website: <https://sedeagpd.gob.es/sede-electronica-web/>
- Postal address: Agencia Española de Protección de Datos  
C/ Jorge Juan, 6  
28001 Madrid – Spain
- General information: <http://www.agpd.es/>

#### **10. Do we have security measures in place?**

Yes. Afi adopts and updates all the technical and organisational measures necessary to ensure personal data is processed in accordance with the requirements of Spanish and European data protection laws.

#### **11. Can the Privacy Policy be amended?**

Yes. Afi reserves the right to amend its Privacy Policy, in accordance with prevailing applicable legislation. Any amendment to the Policy will be published on the Platform, and we therefore recommend that you frequently consult the terms and conditions of the Policy.



**ANNEX**

**MODEL I**

**EXERCISING OF RIGHTS BY A DATA SUBJECT**

Analistas Financieros Internacionales, S.A.  
C/ Marqués de Villamejor, 5  
28006 Madrid – Spain

Mr/Ms ....., of legal age,  
with Spanish ID document (DNI) or equivalent document number ..... a  
copy of which is attached, hereby

**REQUESTS**

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....., pursuant to the provisions of the General Data Protection Regulation.

I also hereby ask for a reply to this request be sent as follows (*complete at least one*):

- By post .....
- By email.....

....., .....20.....

Signed:

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DATA SUBJECT

**MODEL II**

**EXERCISING OF RIGHTS BY A REPRESENTATIVE**

Analistas Financieros Internacionales, S.A.  
C/ Marqués de Villamejor, 5  
28006 Madrid – Spain

Mr/Ms ....., of legal age,  
with Spanish ID document (DNI) or equivalent document number .....,  
representing and in the name of Mr/Ms .....,  
with Spanish ID document (DNI) or equivalent document number ....., hereby

**R E Q U E S T S**

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....., pursuant to the provisions of the General Data Protection Regulation.

I also hereby ask for a reply to this request be sent as follows (*complete at least one*):

- By post .....
- By email.....

A copy of the Spanish ID cards (DNI) or equivalent documents of the Data Subject and of his/her representative, and proof of representation are attached.

....., .....20.....

Signed:

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REPRESENTATIVE