



**WIT**

We Innovate Together

Personal data protection policy

August 1, 2018

**WIT ARCHITECTS S.L.P.** is an Organization in which data processing activities are given personal character, which gives it an important responsibility in the design and organization of procedures so that they are aligned with legal compliance in this matter. In the exercise of these responsibilities and in order to establish the general principles that should govern the treatment of personal data in the Company, approves this Data Protection Policy of a personal nature, which notifies its employees and makes available to all its groups of interest.

### 1. Purpose

The Personal Data Protection Policy is a measure of proactive responsibility that have the purpose to assure the fulfilment of the applicable legislation in this matter and relation to this one, respect for the right to honor and intimacy in the processing of personal data of all the people who are related to The Company. In development of the provisions of this Policy of protection of personal data, which are the Principles that govern the treatment of data in the organization and, consequently, the procedures, and the organizational and security that the people affected by this Policy commit themselves to implement in their area of responsibility. With this in the direction will assign the responsibilities to the personnel that participates in the data processing operations.

### 2. Scope of application.

This Personal Data Protection Policy will apply to the Company, to its administrators, managers and employees, as well as all the people who are related to it, with express inclusion of service providers with access to data ("Data Processor")

### 3. Principles of the processing of personal data.

As a general principle, The Company will scrupulously comply with the legislation on protection of personal data and must be able to prove it (Principle of "proactive



responsibility), paying special attention to those treatments that may pose a greater risk to the rights of those affected (Principle of "risk approach).

In relation to the exposed **WIT ARCHITECTS S.L.P.** It will ensure compliance with the following Beginning:

- *Legality, loyalty, transparency and limitation of the purpose.* The data processing should always be informed to the affected party, through clauses and other procedures; and will only be considered legitimate if there is consent to the processing of data (with special attention to the one provided by minors), or has other valid legitimacy and the inalterability of it is in accordance with the Normative
- *Data minimization.* The data processed must be adequate, relevant and limited to what necessary in relation to the purposes of the treatment.
- *Accuracy.* The data must be accurate and, if necessary, updated. In this regard, shall take the necessary measures to have the data deleted or rectified without delay personal statements that are inaccurate with respect to the purpose of the treatment.
- *Limitation of the conservation period.* The data will be maintained in a way that allows the identification of the interested parties during no more time than necessary for the purposes of the treatment.
- *Integrity and Confidentiality.* The data will be treated in such a way as to ensure adequate security of personal data, including protection against unauthorized or illegal treatment and against loss, destruction or accidental damage, by applying the appropriate technical or organizational measures.
- *Data transfers.* It is prohibited to purchase or obtain personal data from illegitimate sources or in those cases in which these data have been collected or transferred contradicting the law or its legitimate origin is not sufficiently guaranteed.
- *Hiring of suppliers with access to data.* Only suppliers that offer sufficient guarantees to apply appropriate technical and security measures in data processing will be chosen for hiring. With these third parties will be documented the due agreement in this regard.
- *International data transfers.* Any processing of personal data subject to European Union regulations that involve a transfer of data outside the European Economic Area must be carried out in strict compliance with the requirements established in the applicable law.



- Rights of those affected. The Company will provide those affected with the exercise of the rights of access, rectification, elimination, limitation of treatment, opposition and portability, establishing for this purpose the internal procedures, and the models for their exercise that are necessary and timely, which must meet, at least, the legal requirements applicable in each case.

The Company will promote that the principles contained in this Policy of protection of character data personnel are taken into account (i) in the design and implementation of all work procedures, (ii) in the products and services offered (iii) in all contracts and obligations formalized or assumed and (ii) in the implementation of how many systems and platforms allow the access of employees or third parties and / or the collection or processing of personal data.

#### 4. Commitment of the workers.

Workers are informed of this Policy and declare themselves aware that personal information is an act of the Company, and in this respect, they adhere to it, committing to the following:

- Carry out awareness training on Data Protection that the Company puts at your disposal.
- Apply the security measures to user's level that apply to their job, without prejudice to design and implementation responsibilities that could be attributed based on their role within **WIT ARCHITECTS S.L.P.**
- Use the formats established for the exercise of Rights by those affected and inform the Company immediately so that the response can be made effective.
- Inform the Company, as soon as it aware, of designations of the provisions of this Policy, of "Personal data security breaches", using the format established for this purpose.

#### 5. Control and evaluation.

An annual verification and evaluation will be carried out, or whenever there are significant changes in data processing, the effectiveness of technical and organizational measures to ensure the safety of the treatment.

**WIT ARCHITECTS S.L.P.**

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