# **Legal Notice**

#### 1. General Information

"Fundación Vodafone España" (hereinafter referred to as the "Foundation"), with legal personality of a foundational nature and therefore non-profit, is a private foundation as provided for in Law 50/2002, of December 26, on Foundations, belonging to the Vodafone Group. The Foundation was established by deed dated November 11, 1994, and registered in the Ministry of Education's Foundation Registry under number 289, on March 5, 1996, and provided with CIF G-81326084. The registered office of the Foundation is located at Avenida de América, 115 28042-Madrid.

# 2. Website Use Regulations

Access to this website sole responsibility of the users. is the Access and navigation on this website imply acceptance and knowledge of the warnings, legal notices, and terms of use stipulated The user agrees to use the services offered on this website diligently, correctly, and lawfully. The user shall be responsible for any damages that the Foundation may suffer, directly or indirectly, as a result of non-compliance with the obligations arising from this legal notice or from the law regarding the use of this website.

#### 3. Intellectual and Industrial Property Rights

The Foundation holds the exploitation rights of the intellectual and industrial property of this website and is also the holder or has the corresponding license for the intellectual, industrial, and image property rights regarding the content available through it. In no case shall the user understand that mere access and navigation through this website implies a waiver, transfer, license, or total or partial assignment of such rights by the Foundation. Likewise, any modification, copying, reuse, exploitation, distribution, alteration, or partial or total decompilation of any of the content and intellectual and industrial property rights included in this website for public or commercial purposes is strictly prohibited, unless prior written consent from the Foundation is obtained.

# 4. Information Update and Modification

The information appearing on this website is current as of the date of its last update. The Foundation reserves the right to update, modify, or delete the information on this website.

#### 5. Links

Users of this website may find links to other websites through various buttons, links, or banners, which are managed by third parties over whom the

Foundation has no authority or human or technical means to know, control, or approve the information, content, products, or services provided by other

websites linked from this website. Consequently, the Foundation has no

responsibility for the content and information provided on those other linked websites. Furthermore, the establishment of any type of link by the Foundation

to another external website does not necessarily imply that there is any type of

relationship, collaboration, or dependence between the Foundation and the

owner of the external website.

6. Liability Exemption

The Foundation does not take responsibility nor guarantees that access to this

website will be uninterrupted or that it is free of errors. In no case shall the Foundation be liable for any losses, damages, or harms arising from access to

and use of the website, including (but not limited to) damages caused to

computer systems or those caused by the introduction of viruses.

7. Jurisdiction and Competence

These general conditions are governed by Spanish law. For any controversy or

litigation, the Courts of Madrid shall have jurisdiction, with express waiver of any

other forum.

Privacy Policy

**Our Privacy Policy** 

In this Privacy Policy, we explain how we collect, use, share, and protect your personal

information as a result of the relationship established with us through our various initiatives (programs, projects, training, events, studies, ...) and/or our Website. This

Privacy Policy will be updated, and any changes will be published on our website

www.skillsuploadjr.eu ("Website").

We appreciate the trust you have placed in us and your collaboration to ensure that we

handle your information with appropriate guarantees and in accordance with current

regulations.

Last Update: July 31, 2019.

Who We Are

We are FUNDACIÓN VODAFONE ESPAÑA, with CIF G81326084. Please note that in

this Privacy Policy:

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- "we/our" means FUNDACIÓN VODAFONE ESPAÑA;
- "third party" means a third person or entity other than you and FUNDACIÓN VODAFONE ESPAÑA; and
- Our registered office is located at Avenida de América, 115, 28042, Madrid. Our main customer service contact email is <u>infofve@vodafone.com</u>. Additionally, various contact channels are available on our Website.

#### **How to Contact Us**

Your opinion is very important to us, so if you have any questions about our Privacy Policy, you can contact us at the address mentioned above.

## **Our Principles**

Respecting your privacy is fundamental to us; therefore, we want to inform you transparently about the processing we may conduct with your personal data so that you can make an informed decision regarding this. We ask that you take a few moments to read this Privacy Policy.

The main objective of our Privacy Policy is to ensure full compliance with current legislation regarding data protection and privacy, as well as the security of your personal data.

#### Personal Information We Collect About You

The information we collect about you and how we do so may vary depending on the different initiatives (programs, projects, training, events, studies, ...) in which you participate or request information about, how you have used them, how you have interacted with us, e.g., by registering on the Website to request information, completing surveys, etc., the use you make of the Website, or information that we have obtained from a third party with your permission to share with us.

Additionally, you should be aware that some of our initiatives (programs, projects, training, events, studies, ...) have a specific Privacy Policy that we will inform you about if you participate in or request information regarding them.

At FUNDACIÓN VODAFONE ESPAÑA will use your personal data to:

- Satisfy the legitimate interests of Vodafone Foundation in Spain, for example, notifications about our initiatives (programs, projects, training, events, studies, ...). In such cases, we always assess our interests to ensure they do not conflict with your rights. Moreover, in some cases, you have the right to object to such processing. For more information, visit the section "Your Rights" of this Privacy Policy.
- 2. Comply with a legal obligation, such as fulfilling our accounting and tax obligations, or retaining your data to comply with current regulations on data retention, among others.

3. Process your data based on the consent you provided in cases where FUNDACIÓN VODAFONE ESPAÑA does not rely on another legal basis. For example, sending you information from third-party entities with which FUNDACIÓN VODAFONE ESPAÑA has collaboration agreements. In any case, you will always be able to revoke the consent you have provided. For more information, visit the section "Your Rights" of this policy.

We collect your personal information when, for example:

- You register to request any type of information;
- You subscribe to newsletters, alerts, or other services;
- You contact us through our channels;
- You participate in a contest, raffle, or survey;
- You visit or browse our Website or other specific websites for our initiatives (programs, projects, training, events, studies, ...);
- You have given your permission to other third-party entities, such as our collaborators or suppliers, to share your information with us;
- When your information is publicly available, and its use is legally permitted; or
- If you are a beneficiary of any initiative (programs, projects, training, events, studies, ...) in which we collaborate with third parties, and you have given your permission for this to happen.

We also collect information from certain organizations when appropriate and to the extent that we have legal grounds to do so.

We use cookies (small text files stored in your browser) and other techniques such as web beacons (small image files used to track your movements on our website). For more details on how we use these cookies and how to opt-out of these options, please refer to our Cookie Policy on our Website.

The types of information we may have about you include, where applicable:

- Your name, surname, ID number, postal address, phone number and/or mobile number, date of birth, gender, and email address;
- Your data obtained through a contact you make with us through any of our channels: call, if you send an email or letter, or any other record of contact with us;
- Credential information such as access passwords and usernames to access our accounts and services;
- Your preferences for certain initiatives (programs, projects, training, events, studies, ...) if you let us know;
- We will not collect or process information from minors (under 14 years) nor information that could be classified as more sensitive, such as: health, sexual orientation, union affiliation, religion, or race.

#### **How We Use Your Personal Information**

We will use your personal information for the following purposes:

#### 1. To Provide You with Your Service

# Provide you with your services.

Provide you with the necessary information and benefits according to the corresponding initiatives (programs, projects, training, events, studies, ...). This may include third-party services not included in the formalization of your relationship with us.

# User Support

Respond to any questions or concerns you may have about our initiatives (programs, projects, training, events, studies, ...).

#### Informational Messages about Our Initiatives

We will contact you to keep you updated with information about the initiatives available. For example, changes to our terms and conditions or the conclusion of such initiatives.

# 2. For Legitimate Interest

- If you are subscribed to any of our initiatives, FUNDACIÓN VODAFONE ESPAÑA has a legitimate interest in keeping you informed about them.
  We tailor these messages according to the types of initiatives (programs, projects, training, events, studies, ...) you are subscribed to.
- We may send you newsletters, invite you to participate in a survey, or inform you about prize draws or contests.
- If you have expressly authorized us, we will also contact you to inform you about the activities of our collaborators and/or third parties with whom FUNDACIÓN VODAFONE ESPAÑA works.
- Occasionally conduct knowledge and satisfaction surveys about the initiatives carried out by FUNDACIÓN VODAFONE ESPAÑA.
- We will contact you by mail or email, phone, or other available options during the duration of the relationship with you and afterwards.

# **How We Share Your Personal Information**

If necessary, we will share information about you with:

- THE VODAFONE FOUNDATION, primarily for internal reporting purposes;
- Companies that FUNDACIÓN VODAFONE ESPAÑA has contracted or collaborates with to provide services for VODAFONE FOUNDATION or on behalf of FUNDACIÓN VODAFONE ESPAÑA;
- Judges and courts, government agencies, or other public authorities in the event of legal obligation or authorization;

- Third parties where such disclosure is necessary to comply with applicable law or other legal or judicial requirements;
- Third parties for joint initiatives with such third party. These third parties will be responsible for complying with all applicable privacy laws, in case you have authorized us to do so;
- Judges
- We may also need to disclose your information to fulfill our obligations in response to legal requirements from authorities. Your personal data will only be provided when we believe in good faith that we are required to do so under the law and following a thorough assessment of all legal requirements.

#### **Third Parties We Work With**

When you subscribe to FUNDACIÓN VODAFONE ESPAÑA initiatives through a third party or a collaborating organization, we often exchange information with them as part of that relationship to manage your account.

#### **International Data Transfers**

We may need to transfer your information to THE VODAFONE FOUNDATION or service providers in countries outside the European Economic Area (EEA). The EEA consists of countries belonging to the European Union, as well as Switzerland, Iceland, Liechtenstein, and Norway: these countries are considered to have equivalent data protection and privacy laws. These data transfers may happen if our servers (i.e., where we store the data) or our service providers are located in non-EEA countries.

If FUNDACIÓN VODAFONE ESPAÑA sends your information to a country that is not part of the EEA, we will ensure that your information is protected appropriately. We will always ensure the existence of an appropriate contract covering the data transfer. Additionally, if it is determined that the country does not have laws equivalent to EU data protection standards, we will require the third party to enter into a legal agreement reflecting those standards. Also, when necessary, we will seek prior authorization from the Spanish Agency for Data Protection to be authorized for the international transfer.

# **How Long We Keep Your Personal Information**

We will store your information for the time specified by law. If not required by law, we will only keep it for as long as necessary. Generally, once you have ceased to be linked with FUNDACIÓN VODAFONE ESPAÑA, we will keep your information for a period of ten (10) years.

We may contact you about initiatives developed by FUNDACIÓN VODAFONE ESPAÑA during this time if you have not voluntarily opted out of receiving any type of informational communication from us.

## **Keeping Your Personal Information Secure**

We have specialized security teams that continuously review and improve our security measures to protect your personal information from unauthorized access, accidental loss, disclosure, or destruction.

Internet communications (such as emails) are not secured unless they are encrypted. Your communications may pass through an indefinite number of countries before delivery, given the nature of the Internet itself.

We cannot accept any responsibility for unauthorized access or loss of personal information that is beyond our control. We will never ask you for any personal information online through unofficial communication means. You are responsible for keeping your personal and account information secure and for not sharing it with others. If you have any doubts, please contact us before providing your information.

Our Website may provide links to third-party websites. We are not responsible for the security or content of these websites. Please ensure you read the privacy policy and cookie policy of these companies before using or entering personal information on their websites. The same applies to any third-party website or content you connect to use our products and services.

You may choose to disclose your information in certain ways, such as social media plugins (including those offered by Google, Facebook, Twitter, or Pinterest) or using third-party services that allow you to publicly post reviews or other information. A third party may use this information. Social media plugins and applications are operated by the social network itself and are subject to their own terms of use and privacy and cookie policies. You should ensure that you are familiar with these terms.

## **Your Rights**

Below, we explain the data protection rights you have and how you can exercise them:

# Right to Rectification of Personal Data

You have the right to rectify information stored about you if it is not accurate. If the information we hold needs to be updated, or you believe it may be incorrect.

#### Right to Access Personal Data

You have the right to request a copy of the personal data that FUNDACIÓN VODAFONE ESPAÑA holds about you.

#### Right to Data Portability

You have the right to transfer the data that you have provided to us under certain circumstances.

#### Right to Object to the Use of Personal Data

You have the right, in certain circumstances, to object to the processing of your personal information by VODAFONE FOUNDATION IN SPAIN.

# Right to Erasure

FUNDACIÓN VODAFONE ESPAÑA strives to process and retain your data only as long as we need it. In some circumstances, you have the right to request the erasure of your personal data that we have on file. This data will be retained in a blocked state and accessible only by certain people in case we need it to handle any claims or respond to our obligations.

# Right to Restriction

You have the right to request the limitation of the processing of your data so that FUNDACIÓN VODAFONE ESPAÑA can store your data but not use it. This right can only be exercised under certain circumstances, such as:

- You inform us of the inaccuracy of your personal data, during the time necessary for us to verify its accuracy;
- The processing is unlawful and you do not want us to erase your personal data;
- You have objected to any processing that FUNDACIÓN VODAFONE ESPAÑA carries out based on legitimate interest, during the time we need to verify that your right prevails over that interest;
- FUNDACIÓN VODAFONE ESPAÑA no longer requires the personal data for the purposes of processing, but you need it for the formulation, exercise, or defence of claims;

You can exercise your rights as described above by writing with a photocopy of your ID to VODAFONE FOUNDATION IN SPAIN, referencing "Data Protection," at Avenida de América, 115, 28042, Madrid or via the email address infofve@vodafone.com.

#### **How to File a Complaint**

If you want to contact us regarding your rights or if you wish to file a complaint about how we use your personal information, please contact us at <a href="mailto:infofve@vodafone.com">infofve@vodafone.com</a>.

You can also send any claim to the Spanish Data Protection Agency. For more information, please consult www.agpd.es.

We will do everything in our power to resolve your complaint in the shortest time possible.