



Data Protection Policy

This privacy policy establishes the way in which the personal data that the DATA SUBJECT will provide will be managed. This policy is expressly and fully accepted by the DATA SUBJECT from the moment in which, for the use of the site or the services offered by THE DATA MANAGEMENT CONTROLLER (hereafter THE CONTROLLER), their personal data is communicated, given that such communication is always voluntary and will imply an explicit act of acceptance of the conditions of processing of personal data for the purpose informed by THE CONTROLLER.

The DATA SUBJECT is informed that any processing of personal data will be subject to the current legislation in Spain regarding data protection.

For the purposes of the provisions of Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council, regarding the protection of natural persons with regards to the processing of personal data and Spanish Law 3/2018 regarding Personal Data Protection and Digital Rights Guarantee, the details of the data management controller are clearly and transparently shown.

1.- IDENTIFICATION AND CONTACT INFORMATION OF THE DATA MANAGEMENT CONTROLLER AND THE DATA PROTECTION SUPERVISOR

- **Registered name:** GUIL ACCESORIOS DE MÚSICA, S.L.
- **VAT N°:** ESB-96.498.829
- **Registered address:** POL. IND. LA CREU C/ISMAEL TOMÁS ALACREU Nº 28-30 - C.P. 46250 L' ALCÚDIA (VALENCIA) SPAIN
- **Contact email address:** info@guil.es

You can contact the supervisor responsible for Data Protection for THE CONTROLLER on the following email address: m.desantos@movalen.es.

THE CONTROLLER has adopted the appropriate security measures in its facilities, systems and processes. It has established all the technical means at its disposal to avoid the loss, misuse, alteration, unauthorised access and theft of the data provided by the DATA SUBJECT, thus ensuring its integrity and confidentiality.

Failure to provide the requested personal data or non-acceptance of this data protection policy means that it is impossible to carry out the service requested by the DATA SUBJECT.

The personal data provided by the DATA SUBJECT will be kept as long as there is a mutual interest in maintaining the aim of the processing, and for the period necessary to comply with the legal obligations. When the data is no longer necessary for such aims, it will be deleted with security measures sufficient to guarantee its anonymisation or its complete destruction.

2.- HOW HAVE WE OBTAINED PERSONAL DATA?

The personal data that we process has been provided by the DATA SUBJECT via the means of contact featured on our website.

It is up to the DATA SUBJECT to check the veracity and accuracy of the data provided and to communicate any changes which may occur to allow for its updating.



3.- TO WHAT END DO WE PROCESS YOUR DATA?

- Providing the services requested.
- Contact form: allowing you to contact us, and allowing us to respond to your requests for information, quotations and contact with distributors.
- Sending of E-mails: answering your requests; providing services
- Human resources and staff selection
- Sending of commercial information, including our newsletter, via any means, whether electronic (Whatsapp, E-mail, SMS, MMS, etc) or non-electronic (post, etc), providing that the aim of such communication is to maintain the relationship existent between the User and the Controller, as well as carrying out information tasks and other activities inherent to the services it provides.

4.- HOW LONG DO WE PROCESS YOUR DATA?

We keep the personal data provided for the time necessary to carry out the tasks for which it was gathered, as well as for the period when any kind of legal responsibility is applicable.

- Supplying the services requested: the data provided is kept while the commercial relationship lasts, or for the time necessary to fulfil any legal obligations.
- Contact form: once your request has been answered, the data will be deleted, unless the user maintains a contractual relationship with the CONTROLLER
- Sending of E-mails: the personal data will be kept for the correct time in each case, following professional and legal criteria
- Human resources and staff selection: the personal data will be kept for a maximum of 1 YEAR

Sending of commercial information and publicity: the personal data will be kept as long as their deletion from our database is not requested.

5.- HOW IS THE DATA PROCESSING LEGITIMISED?

The legal base for the processing of your data is the execution of a contract, the provision of a service and/or the consent given when accepting our privacy policy.

- Provision of the services requested: execution of a service contract and/or consent of the data subject when accepting our privacy policy
- Contact form: consent of the user by requesting information and sending the form, thus accepting our privacy policy.
- Sending of E-mails: consent of the user by requesting information via the E-mail address
- Human resources and staff selection: consent of the user by sending us their curriculum details, accepting our privacy policy
- Sending of commercial information and publicity: the processing is based on the data subject's consent by ticking our privacy box.



6.- FORWARDING OF USER PERSONAL DATA TO THIRD PARTIES

Under no circumstances will GUIL share your personal information with any other third party without previously informing you and receiving your consent.

The CONTROLLER informs the DATA SUBJECT that any transfer of data that must be made will be brought to their attention by informing them in an explicit, precise and unambiguous way of the recipients of the information, the purpose for which the data will be used, and the nature of the transferred data and, where appropriate, when the legislation establishes it, the DATA SUBJECT will be asked for their explicit, unequivocal, specific and informed consent.

7.- TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

We may use social media as a means of communication and promotion of our services. We do not use the data for non-permitted purposes. We do not accept responsibility for the content, comments, opinions or information, our own or those of third parties, which the users publish on our corporate accounts. Social media companies have their own privacy policies and we recommend that you study these policies before using social media.

8.- USER REGISTER

The website has a public area, visible to anyone who enters the site, and private areas, visible only when the USER has registered with the site: in this case, the USER must keep their access key strictly confidential. To this end:

- The access profiles and passwords used must be confidential, personal and non-transferrable. The owner of the password is responsible for the use made of it.
- The user must not keep their access key in any legible form on a hard drive, paper or any other kind of support which may be accessible.

The user will change their password in the following circumstances:

- If they suspect that somebody has breached their security
- If the password is known to another user or they suspect it might be.

By virtue of the foregoing, the USER is obliged to notify the CONTROLLER immediately about any fact which facilitates undue use of the identifying signs and/or passwords, such as theft, loss or unauthorised access, so that they may be cancelled immediately. If such facts are not communicated, the CONTROLLER cannot be held responsible for any undue use of the identifying signs or passwords by unauthorised third parties.

9.- MINORS

Underage users must not supply any data at all via <https://www.guil.es>. In any case, the Controller is not responsible for the truth and accuracy of the data filled in by the User, and for this reason cannot check their age.



10.- EXERCISING YOUR RIGHTS OF ACCESS, RECTIFICATION, CANCELLATION OR SUPPRESSION, OPPOSITION OR LIMITATION TO THE PROCESSING OR PORTABILITY

We inform you that you can exercise your rights of access, rectification, deletion, limitation of processing, or opposition to processing, as well as the right to transfer of data by contacting the Data Management Controller by any means subject to law, accompanied by a copy of official document that identifies you by writing to: GUIL ACCESORIOS DE MÚSICA, SL, with postal address POL. IND. LA CREU C/ ISMAEL TOMÁS ALACREU Nº 28-30 - CP 46250 L'ALCÚDIA (VALENCIA) SPAIN, or by sending an email to info@guil.es, indicating in the Subject line: DATA PROTECTION RIGHTS, and sending a copy of your identity document. If you consider that our data management does not comply with current regulations, you can submit a claim to the control authority at agpd.es.

The request must contain the name, surname of the DATA SUBJECT, copy of a document that proves your identity (such as passport or identity card) and, in the cases that are admitted, identification document of the person who represents them, as well as a document proving the representation, a document in which the petition is specified, address for the purposes of notifications, date and signature of the applicant and supporting documents of the petition he formulates.

If the request does not meet the specified requirements, corrections will be required. Regarding the right of access, it will only be denied when the request is made by a person other than the affected party. No consideration will be required for the exercise of rights.

In the case that consent has been granted for a specific purpose, the right to withdraw said consent can be exercised at any time, without affecting the legality of the processing based on the prior consent to its withdrawal.

The DATA SUBJECT is informed of the right that he has to file a claim with the Spanish Agency for Data Protection (AEPD) and / or request his protection, in particular, when he considers that he has not obtained satisfaction from THE CONTROLLER, in the exercising your rights, through the electronic site of their web portal (www.agpd.es), or by writing to their postal address (C / Jorge Juan, 6, 28001-Madrid).

The DATA SUBJECT declares that they have been informed of the conditions on Protection of Personal Data in the terms established in Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council, regarding the protection of natural persons with regards to the processing of personal data, granting your consent to the processing of your personal data in relation to the purposes described above, in the manner and for the purposes indicated in this Privacy Policy.

THE CONTROLLER reserves the right to modify its data protection policy according to its criteria, or because of a change in legislation, jurisprudence or business practice.

If THE CONTROLLER includes any modification, the new text will be published on this website, where the DATA SUBJECT can obtain information of the current data protection policy.

The Controller has taken the necessary security measures in their installations, systems and processes. They have used all the technical means at their disposal to prevent the loss, misuse, alteration, unauthorised access and theft of the data provided by the DATA SUBJECT, thus protecting their integrity and confidentiality.

11.- USE OF GOOGLE reCAPTCHA

To ensure the security of our website and prevent misuse of our forms by automated bots, we use the reCAPTCHA service provided by Google Ireland Limited ("Google").

Data Controller: ABSOLUT STRATEGY CONSULTING, S.L. is the Data Controller responsible for the personal data collected through this service. Google acts only as our Data Processor, processing the information in accordance with our instructions and pursuant to the Data Processing Addendum (DPA) established between both parties.



Data Collected: The use of reCAPTCHA involves the analysis of various types of information (such as the user's IP address, time spent on the website, or mouse movements) in order to distinguish between human users and automated systems. This information is transmitted to and processed by Google.

Legal Basis: The processing is based on our legitimate interest (Article 6(1)(f) of the GDPR).

Purpose: To analyze user behavior in order to prevent abuse, spam and automated attacks on forms and user accounts.

Data Transfers: The data is transferred to and stored on Google servers located in the United States.

Retention Period: Personal data collected through reCAPTCHA will be retained only for as long as strictly necessary to analyze the user's interaction and determine whether the traffic is legitimate or automated. As a general rule, this information is processed in real time or retained by Google for a short period, for a maximum of six months for service improvement purposes, after which it is deleted or anonymized.