

Data protection

Legal Texts GDPR 2016/679 – LQPD 29/2021

Ver. 22.1

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1.1 Legal Notice

IDENTIFYING DATA OF THE INFORMATION SOCIETY SERVICES LENDER

In accordance with the applicable provisions on the processing of personal data and the protection of privacy in the electronic communications sector, we inform you of the following information:

ASSAP ASSEGURANCES, S.A., [hereafter **ASSAP ASSEGURANCES**], is the owner of the web page **assap.ad**, and will act exclusively as the manager of the contents of the present Web, addressed at: AVDA. DE ENCLAR, 26 -AD500 SANTA COLOMA (PRINCIPAT D'ANDORRA), NRT A701485T, Commercial Register number 910245R, is responsible for the management and functioning of the Web previously mentioned.

If you would like to contact us, you can do so by post at the previously mentioned address, or by e-mail at: **info@assap.ad**

INTRODUCTION

This Legal Notice regulates the use of this web page. Access on the web is free except for the cost of the connection through the telecommunications network provided by the access provider hired by users.

ACCEPTANCE

If you use the web, you are considered a user, and this implies full acceptance without any reservation of every and each point in this Legal Notice, published by **ASSAP ASSEGURANCES**, from the moment the user accesses the web. In consequence, the user must read carefully the present Legal Notice every time he or she wishes to use the web, as these may be modified.

INFORMATION ABOUT LINKS

ASSAP ASSEGURANCES is only responsible for its own web and any access to webs by links or any information offered by third parties is not the responsibility of **ASSAP ASSEGURANCES**.

Any use of links or access to a web not owned by **ASSAP ASSEGURANCES** is at the users responsibility and **ASSAP ASSEGURANCES** does not recommend nor guarantee any information obtained by a link through a third party which comes from a web that is not from **assap.ad**, neither is it responsible for any loss, claims or damages derived from the use or bad use of a link or the information obtained through it, including other links or webs, interruption of service or in the access, or trying to use or the incorrect use of a link, even if the connection is via the Web **assap.ad** or by accessing the information by other webs from the same Web page.

LIMITATION OF WARRANTIES AND RESPONSIBILITIES

ASSAP ASSEGURANCES makes every effort to avoid any errors in relation to the contents of this website.

ASSAP ASSEGURANCES adopts the necessary measures and mechanisms to guarantee the security of communications and transactions that occur through the web portal, according to the state of technology and in accordance with the type of transactions and services that are provided. available to users.

ASSAP ASSEGURANCES will not be responsible for any damage that may be caused to the users computer system by any cause beyond or not attributable to this website, including, without limitation, damages caused by interference, omissions, interruptions, viruses computer, telephone breakdowns or disconnections in the operational functioning of the electronic system. Likewise, **ASSAP ASSEGURANCES** will not be liable for any interruption, error or failure that occurs in the system, due to a malfunction of the network or the servers that are connected.

INDUSTRIAL AND INTELLECTUAL PROPERTY, TRADEMARKS

The structure, design and way of presenting the elements (graphs, images, files, logotypes, colour combinations and any element susceptible to protection) are protected by intellectual property laws, owned by **ASSAP ASSEGURANCES**.

It is prohibited to reproduce, transform, distribute, communicate in public, make publicly available and in generally exploit in any form partially or totally the elements referred to in the previous section. These acts of exploitation can only be carried out if authorized by **ASSAP ASSEGURANCES**, and if this were to be the case, there must be explicit reference to the fact that **ASSAP ASSEGURANCES** is the intellectual owner of the material.

Only documental material produced by **ASSAP ASSEGURANCES** is authorized for private use, and in no case, can the material be deleted, changed, eluded or any of the security systems installed be manipulated.

It is forbidden to link to the final pages, the frame and any other similar manipulation. The links must always be to the principal page or homepage **assap.ad**

Distinctive signs (brands, commercial names) belonging to **ASSAP ASSEGURANCES**, are protected by industrial property rights and the use or manipulation of them is forbidden except if there is written authorization by **ASSAP ASSEGURANCES**.

DO NOT SHARE YOUR PERSONAL INFORMATION

ASSAP ASSEGURANCES will never send you an e-mail and neither call you by telephone to ask you for your password or to verify your password belonging to your account and likewise will never ask for your bank account number or credit card and neither any other personal information. If anybody should contact you or send you an e-mail that you have not asked for, you should never give them any of your personal data previously mentioned. Also, you should never respond and communicate to the appropriate authorities in order to proceed with investigating the incident.

IDENTIFY FALSE E-MAILS (“SPOOFING OR PHISHING”)

Ignore all e-mails in which they demand personal information or ones which redirect you to another web page that does not belong to or any societies belonging to the group or in which they ask you to pay via a means which has not being authorized by **ASSAP ASSEGURANCES**, as this could be an attempt at identity theft (“spoofing or phishing”) and must be considered as fraudulent.

ASSAP ASSEGURANCES uses the “**assap.ad**” domain for all its e-mails. If you receive an e-mail in a different format, for example: assap.security@hotmail.com, you can be assured that it is a false mail. Some e-mails that use phishing contain links to a web page that uses the word **ASSAP ASSEGURANCES** at their URL, but they will direct you to a web page that is completely different. If you drag your mouse over the link, you will be able to see the associated URL, which will probably have a different format to the correct web pages authorized by **assap.ad**. Even if you click an e-mail that uses phishing and are redirected to a page that resembles “your account” or to any page that asks you to verify or modify your personal information, ignore it and consider it as fraudulent.

INFORM ANY ATTEMPTS AT PHISHING

Send an e-mail to **info@assap.ad** and attach any e-mail that you consider to be false. By attaching these e-mails, you will be helping to locate their origin. If you cannot attach the false mail, forward it to **dpd@assap.ad** and include as much information as possible about it.

1.2 Privacy Policy

RESPONSIBLE

According to the data protection act of **General Regulation (UE) 2016/679 on data protection** and **Law 29/2021 qualified on Protection of Personal Data (LQPD)**, we inform you that personal data given via the forms, and likewise your e-mail address have been included in our file titled **ASSAP ASSEGURANCES, S.A.** [hereafter, **ASSAP ASSEGURANCES**], at the business address of: AVDA. DE ENCLAR, 26 -AD500 SANTA COLOMA (PRINCIPAT D'ANDORRA), NRT A701485T, Commercial Register number 910245R, is responsible for the management and functioning of the Web previously mentioned.

We inform you that the data could be used to send you commercial communications, in any format, and this could be related to any other services offered by our business which might be of interest to you. If you should at any time oppose this type of communications, please send us an e-mail address to **info@assap.ad** indicating the subject as **“Unsubscribe from the distribution list”**.

Likewise, you can exercise the right to **access, rectify, suppression, opposition, portability and limitation**, according to the terms established by **REGULATION (EU) 2016/679** and **LQPD 29/2021** by presenting or sending an application in writing to the email address: **dpd@assap.ad** and with a photocopy of your ID or similar documentation indicating the subject as **“Data protection”**.

POLICY

ASSAP ASSEGURANCES is especially sensitive to protecting the personal data of our users which has been obtained through the services offered on our Web. The present privacy policy informs all the users of **assap.ad**, how the personal data collected from the through the **additional information**, in order that they decide, freely and voluntarily, if they wish to provide the requested information

SECURITY MEASURES

Finally it is reported that **ASSAP ASSEGURANCES**, has adopted in the information system the appropriate technical and organizational measures, in order to guarantee the security and confidentiality of the stored data, thus avoiding its alteration, loss, treatment or unauthorized access; taking into account the state of the art, the costs of application, and the nature, scope, context and purposes of the treatment, as well as risks of probability and variable severity associated with each of the treatments.

RIGHTS OF THE USERS

The person interested in the personal data may exercise his / her rights, in accordance with the General Data Protection Regulation and the Qualified law 29/2021 (LQPD), which are:

A. - The right to **access** is to be exercised annually, except if the party interested shows legitimate accreditation.

ASSAP ASSEGURANCES will proceed to notify its decisions within a timeframe of a month. If it were to be accepted, the interested party would be able to access the previously mentioned information within 10 days after its notification.

B. - The right of **rectification** and **suppression** can be exercised, conforming to the following provisions, whenever the interested party considers that the data collected in our files is *inexact, incomplete, inadequate or excessive*. If this is the case, you can exercise these rights via one of the means previously anticipated.

ASSAP ASSEGURANCES will proceed with the rectification or suppression within 10 days of receiving the

application.

C. - The right of **opposition** may be exercised, in accordance with the following provisions, provided that the interested party wishes to oppose the processing of their personal data, whether or not the data is lawfully treated as being of legitimate interest or relative consent for advertising purposes.

D. - The right of **portability** they may be exercised, in accordance with the following provisions, provided that the interested party considers that the data collected in our treatments must be returned to the data holder or to another third party (Treatment Manager).

E. - The right of **limitation of treatment** may be exercised, prior to opposition right for the treatment of their data, and that until the Opposition Law is not resolved, the treatment of them will be limited.

REGULATION CHANGES

ASSAP ASSEGURANCES reserves the right to modify the present policy with the objective of adapting it to the legislative or precedents changes. Such changes will be communicated within the necessary time on our Web page, and it can ask the affected parties for their consent if it is believed that it does not have the consent according to the present policy.

If you should have any doubt, question or comments referring to the present regulations, please do not hesitate to ask about them by sending a communication to: **info@assap.ad**

1.3 Cookie Policy

The domain **assap.ad** uses automatic "**Cookies**" collection procedures to gather personal information such as the type of browser or operating system, reference page, route, ISSP domain, etc. All this in order to improve the services provided. "**Cookies**" help us adapt this website to your personal needs.

What are cookies?

A "**Cookie**" is a small file that is stored on the user's computer and allows us to recognize him. The set of "**Cookies**" helps us improve the quality of our website, thus allowing us to personalize to a certain extent the navigation of each user on our website. "**Cookies**" are currently essential for the operation of the Internet, providing innumerable advantages in the provision of interactive services, facilitating the navigation and usability of our website.

Please note that "**Cookies**" cannot harm your equipment and, in return, that they are activated help us to identify and resolve errors and improve the navigability of our website by providing a better experience.

Cookies are used to:

- Make sure that web pages work properly.
- Store your preferences, like language or font size.
- Find out about the user's browsing experience.
- Compile anonymous statistical information, like which pages the user has visited or how long they have spent on the website.

Type, purpose and operation

Depending on their permanence, Cookies can be divided into two categories: session cookies and persistent cookies. The former expires when the user closes the browser. Whereas the latter expire when their aim is achieved or when they are deleted manually.

In addition, depending on their aim, Cookies can be classified as follows:

- **Required:** those that are strictly necessary and essential for the correct functioning of the Website. They are normally generated once the user visits the website or logs in and are used as a form of identification on the website with the following objectives:
 - They keep the user identified in such a way that, if they leave the website, exit the browser or device and then visit the page at a later time, they continued to be identified, which makes browsing easier as they do not have to identify themselves over again.
 - They confirm whether or not the User is authorized to access certain services or areas of the Website.
- **Preferred:** These enable the Website to record information related to the way that it behaves and its appearance - such as the language or the region where it is located.
- **Statistical/analytical:** These are used to analyses and improve the browsing experience, optimize the functioning of the website, and see how visitors interact, by collecting and reporting information - usually anonymously, but sometimes also uniquely and unmistakably identifying the user - in order to obtain reports on the interests of users in the services offered by the website.
- **Marketing:** These cookies collect information about adverts shown to website users. There are two types:
 - **Anonymous:** These collect information only about the advertising spaces shown on the Website, regardless of the user who browses without not expressly identifying him or herself.
 - **Custom:** They collect the user's personal information from the website on behalf of a third party, in order to customize ad spaces.

- **Geolocation:** These cookies are used to determine the country of the user when they visit a service on a website, in order to offer content and services suitable to their location.

Adequate privacy / Cookie management

For more information about the appropriate configuration of cookies and the activation, restriction and / or disabling options, you should go to the help section of your browser to learn more:

Google Chrome	http://support.google.com/chrome/bin/answer.py?hl=es&answer=95647
Internet Explorer	http://support.microsoft.com/es-es/help/17442/windows-internet-explorer-delete-manage-cookies
Mozilla Firefox	http://support.mozilla.org/es/kb/habilitar-y-deshabilitar-cookies-que-los-sitios-we
Apple Safari	http://support.apple.com/kb/ph5042

The user must know that, when disabling Cookies, some of the features and services may be disabled or have a different behaviour than expected, such as, for example, staying identified, keeping purchases in the cart, its location, etc. among others and that its navigation is notably degraded.

Updating of the Cookies Policy

The data controller may modify this Cookies Policy based on legislative or regulatory requirements, or in order to adapt said policy to the instructions issued.

1.4 Additional Information

PROTECTION OF PERSONAL DATA GDPR (UE) 2016/679 – LQPD 29/2021		
Additional Information		
Responsible	Identification of the Person in charge of Treatment.	ASSAP ASSEGURANCES, S.A. A701485T AV. D'ENCLAR, 26 – AD500 SANTA COLOMA (PRINCIPAT D'ANDORRA) +376 729 200 info@assap.ad
DPD	DPD Contact	TECNODRET, S.L. dpd@assap.ad
UE Representative	Identification and contact of the UE Representative	Mallafre Consultors, SL.U. e-mail: representant.ue@mallafre-consultors.cat
Purposes	Description of the treatment	In accordance with the “ <i>principle of limitation of purpose</i> ”, the data collected will be processed exclusively for specific, explicit and legitimate purposes and will not be further processed in a manner incompatible with said purposes. We inform you of the existence of automated decisions, including the creation of profiles in order to improve your user experience and provide
	Conservation time	The personal data provided will be kept as long as the commercial / commercial relationship is maintained as long as you do not request its deletion. We inform you that in accordance with the legal provision, we are obliged to keep them for tax and accounting reasons, and to make them available to a competent public entity that so requests.
	Automated decisions	The report on the existence of automated decisions, including the elaboration of profiles in order to enhance the user's experience and provide information, services or products adapted to the specific
Legitimation	Legal basis of treatment	The legal bases for the treatment of your data are legitimized in the collection of the same, stating if it is a legal, contractual, public interest, legitimate interest or your explicit consent requirement.
Recipients	Recipients of the assignment	The personal data collected will not be transferred or communicated to third parties except by legal obligation.
	International data transfers	Yes, they occur, and they provide all the appropriate guarantees assumed by the data controller or processor established in one of more third countries as provided by the art. 46 of the GDPR (UE) 2016/679 and by the art.44 of the LQPD 29/2021.
	Treatment processors	The data may be transferred to Data Processors with access to data, with whom the obligations and responsibilities required by the GDPR (UE) 2016/679 and by the LQPD 29/2021 are formalized and who offer sufficient

Rights	Exercise of rights	<p>The interested party may exercise the rights that assist him, in accordance with the RGPDUE 2016/679 and the LQPD 29/2021 and which are:</p> <ul style="list-style-type: none"> • Right to request access to personal data regarding the interested party. • Right to request its rectification or deletion. • Right to request the limitation of your treatment. • Right to object to the treatment. • Right to the portability of your data. <p>The interested party may exercise these rights by submitting a letter to the address of the data controller or by sending a statement to the email dpd@assap.ad accompanied by an identification document. In the event that the interested party acts through a legal representative, he must provide the identification document and the proof of his legal representation. In the case of considering your right to the protection of violated personal data and want to know more information about this right and how to exercise it, you can contact the APDA: http://www.apda.ad/ Tel. (+376) 808 115 Edifici del Consell General C/ Doctor Vilanova, 15-17 (planta 5) AD500 Andorra la Vella (Principat d'Andorra).</p>
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