

PRIVACY POLICY ON PERSONAL DATA PROTECTION FOR NEINOR HOMES GROUP COMPANIES			
ABOUT US	1	Who is responsible for controlling the processing of my personal data?	NEINOR HOMES, SA ('Neinor'), a company with registered office at Calle Ercilla, 24, 2ª planta, 48011 Bilbao, and Tax ID No. A-95786562.
	2	How can I contact the Data Protection Officer of Neinor?	You can contact our Data Protection Officer (a) by postal communication to the address indicated in the previous section of this document, or (b) by sending an email to the following address: lopd@neinorhomes.com .
ON HOW WE HANDLE YOUR PERSONAL DATA	3	For what purpose will Neinor use them?	<p>We will use your personal information, depending on the type of personal data you consent to communicate to us by marking the corresponding box or button, and what you can reasonably expect to obtain from us, for one or more of the following purposes:</p> <p>a) To manage any type of query, complaint, question or need for information that may need to be carried out, either from our website contact form, or through our email address.</p> <p>b) To manage your candidacy in the recruitment process, in the case that you have sent us your CV through the "Work with us" section of this website. Your personal data will be managed with the network of companies that work with our supplier; we can send communications related to employment and other commercial communications.</p> <p>c) To send you all type of commercial communications, for instance: (i) Job offers and employment information of Neinor, (ii) offers of courses and / or postgraduate programs of Neinor collaborators, and (ii) volunteer offers and charity activities organized by Neinor or its collaborators.</p> <p>d) To manage any kind of inquiry, complaint, query or information needs that may be required, whether from our web contact form or from our information email address.</p> <p>e) To send you our periodical newsletters.</p> <p>f) To perform statistical analyses and market research to enable us to improve our services and technology.</p>
	4	How long will Neinor keep my data once the purpose for which they are processed is fulfilled?	We will use your personal information only for the time necessary to achieve the purposes described in point 3 above. After this, and provided you do not exercise your right of removal, we will keep your personal data, with the required security measures and blocked with a pseudonym, for a period of ten (10) years, after which we will then remove them from our information processing system.

	5	Does Neinor carry out automated processing or create profiles with my data?	<p>Yes, we can inform you that, to carry out the processing for the purpose(s) indicated above, we can base this on automated decisions, including creating profiles, such as for example when performing statistical analyses and market studies that allow us to improve our services and technology.</p> <p>In any event, so that the processing of personal data is carried out with appropriate safeguards, in these cases we will only and exclusively use those data that are specific and essential to the development of the profile and, in any event, all those that, thanks to your consent, we have available to us.</p> <p>We also inform you that such handling based on automated processing will not, under any circumstances, result in any detriment to you, nor disclosure, exposure, alteration or manipulation of your personal data, and its main consequences will be the sending of personalized commercial offers depending on your circumstances and needs.</p>
ABOUT WHY WE ARE PROCESSING YOUR PERSONAL DATA	6	Why is Neinor processing my data?	Only thanks to the express consent you grant us by accepting this privacy policy by clicking the appropriate button.
	7	Do I have to authorize the processing of my data?	As long as you want to make use of our products or services for the purposes described above, we need to process your personal data. Consequently, any refusal by you to provide the data to us will make it impossible for us to contact you, handle the procuring of products or provide you with the services in question.
WITH WHOM DO WE SHARE YOUR PERSONAL DATA?	8	To whom can Neinor communicate and/or transfer my data?	<p>We will not transfer your personal information to anyone unless we are required by law or you have previously expressly authorized it.</p> <p>However, to provide you with the services to which we have referred to above, we may need to share your personal data with other companies of the Neinor Group or with some of our external collaborators, such as Estate Agents.</p> <p>In case that you use card payment services through a dataphone or virtual POS, we inform you that neither of these services belong to NEINOR. These services are owned by a third party, UNIVERSAL PAY, which may process your personal data for payment management purposes.</p>
	9	Will my data be transferred to third countries?	No, your data will not be transferred to companies with their registered office in any foreign country.
ON THE RIGHTS YOU HAVE REGARDING YOUR PERSONAL INFORMATION	10	What rights do I have over the personal data I have provided to Neinor?	<p>We remind you that, at all times, you can exercise the following rights regarding your personal data:</p> <p>a) <u>Access</u>. You have the right to access your personal information to know what particular data we are processing.</p> <p>b) <u>Correction</u>. Under certain circumstances, you have the right to rectify any inaccurate personal data that we are processing.</p> <p>c) <u>Removal</u>. Under certain circumstances, you have the right to request removal of personal data which you do not want us to keep processing.</p> <p>d) <u>Opposition</u>. Under certain circumstances, and for reasons related to your particular situation, you have the right to object to the processing of your personal data, in which case we will keep them blocked during the period described in point 4 above.</p>

			<p>e) <u>Restricted processing</u>. Under certain circumstances, you are entitled to request the restriction of processing of your data to those specific purposes you want.</p> <p>f) <u>Portability</u>. Under certain circumstances, you are entitled to receive the personal data that you have provided us, in a structured, commonly used and machine-readable format, and that we pass them on to a data processing controller other than Neinor.</p> <p>To exercise any of these rights, you must send a written communication to Neinor in which you attach a copy of your National ID document/passport. You will be able to make such communication (a) by post to the attention of the Data Protection Officer and the address listed in the first section of this document, or (b) by sending an email to the following address: lopd@neinorhomes.com</p>
	11	Do I have the right to withdraw consent I have given to process my data?	<p>Yes, at any time you can withdraw any consent you have given us without this affecting the lawfulness of the processing. To do so, you need only send a communication following either of the two methods described in the previous section.</p>
	12	And if I do not agree with the processing Neinor has done of my data? Can I complain to someone?	<p>If you are not in agreement, or believe that we have not dealt with your personal data in accordance with the regulations, you can contact our Data Protection Officer via email at lopd@neinorhomes.com. You can also file a complaint with the Spanish Data Protection Agency (www.agpd.es).</p>