

POLICY ON PERSONAL DATA PROCESSING

CUPAGROUP
Since 1892



Cupa Group is fully committed to the correct processing of personal data pursuant to European Regulation 2016/679 and Spain's Organic Law on the Protection of Personal Data and Guarantee of Digital Rights 3/2018.

Compliance is obligatory for Cupa Group employees, directors, governing organs and collaborators whatever their location, hierarchical position in the organizational chart or the type of contractual relationship uniting them to the company, as well as for the different forms of administrative organs that manage the company and the members of those organs.

Commitments

- Cupa Group undertakes to establish the opportune measures for the correct identification and subsequent classification of personal data managed by anyone related to the company.
- Special care and special protection measures will always be taken with data which the regulations classify as special category data.
- Persons in Cupa Group acquire a confidentiality commitment and a promise to not transfer data to third parties, especially the personal data they have to deal with as part of their work.
- Cupa Group shall ensure with "disclaimer" type messages in all its communications that third parties are correctly notified of the processing of their personal data.
- The data Cupa Group handles will be destroyed effectively in both digital and physical formats.
- Anyone may exercise their ARCO rights against the controller and Cupa Group itself shall publicize these rights in its communications.
- The necessary technical measures will be adopted to guarantee compliance with these principles in the digital sphere.



Javier Fernández
CEO Cupa Group
30th June 2021
