

Privacy Policy

Telefónica Cybersecurity & Cloud Tech, S.L.U. (hereinafter, “**Telefónica**”) is committed to respecting the privacy of users as well as the secrecy and security of personal data, in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), as well as in Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights.

Some of our principles are:

TRANSPARENCY

We will not process your data in an unexpected, obscure or abusive way. When we collect your personal data through the relevant web form and/or email, you will be properly informed about: who is processing your data, the purpose of the processing, on what is based the legitimacy of the processing, the possibility of exercising your rights and other information of interest. In addition, your data will be deleted, according to the defined retention policy about which you will be informed and, in any case, when you request it by exercising your right of erasure.

CONTROL

We will request your consent whenever necessary and will provide you with the necessary tools to access and update your personal information as well as to decide how to manage your data.

SECURITY

We are concerned with ensuring the security, secrecy, and confidentiality of your data. Therefore, as part of our commitment and in compliance with current legislation, we have adopted the most rigorous and robust security measures and technical means to prevent their loss, misuse or unauthorized access, committing ourselves to keeping them secret and guaranteeing the duty to safeguard them by adopting all necessary and reasonable measures to prevent their alteration, loss and unauthorized processing or access, in accordance with the provisions of relevant legislation.

For all these reasons, at Telefónica your privacy is a priority, which is why we protect your information in accordance with the Privacy Policy that you can read below. If you have any questions about it, contact us at gdpr-comms.tech@telefonica.com and we will be pleased to help you.

1. ¿Who is the data controller of your data?

Telefónica Cybersecurity & Cloud Tech, S.L.U., a company with ID number B-01636760 and registered office at Ronda de la Comunicación s/n, Distrito Telefónica, Edificio Oeste 3, C.P. 28050, Madrid (Spain), will be the data controller of your data in accordance with what we inform you in this Privacy Policy.

Likewise, at Telefónica we have a Data Protection Officer who ensures compliance with data protection legislation and with whom you can contact for any question, doubt and/or complaint you may have when we process your data, by writing to DPO_telefonica@telefonica.com.

2. What do we process your data for?

Telefónica, in its capacity as an intermediary service provider in accordance with Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a single market for digital services and amending Directive 2000/31/EC (hereinafter, “**Digital Services Regulation**” or “**DSA**”), will process the personal data it has obtained about you through the data collection channels enabled, in order to attend to and respond to contact requests, notifications, complaints and/or appeals that you have raised related to the provision of an intermediary service by Telefónica.

3. Why do we process your data?

The legal basis on which we rely to carry out the processing of your personal data is the consent you give us when you send us the corresponding contact web form and/or email.

4. What data do we process about you?

The data we process are your identification, contact and/or professional data (e.g. name and surname, email, contact telephone number and/or company or competent authority you work for) collected through the data collection channels enabled, the processing of which is necessary to be able to respond to you and/or comply with the obligations imposed on Telefónica by the Digital Services Regulation.

5. How do we collect and where does your data come from?

The data we process is that which we obtain directly from you when you complete the corresponding web contact form and/or send us an email.

Remember that the personal information you provide directly must always be real, truthful and up to date.

6. How long do we keep your data?

In general, we will keep your data for the period necessary to comply with the purpose described, not being kept longer than necessary to respond to the requests, notifications, complaints and/or appeals raised and, where appropriate, to deal with the possible responsibilities of Telefónica in relation to them.

In any case, your data will be kept as long as you do not withdraw the consent given and/or object to its processing. In this regard, we will make our best efforts to provide you with an automatic and simple mechanism so that you can withdraw the consent given and/or object to the processing and, in any case, we are at your disposal in the email for the exercise of rights informed in section 8 of this Policy.

7. Who has access to your data? Are there international data transfers?

In order to carry out the purpose of the processing described, we may use authorized subcontractors acting on behalf of Telefónica, in their capacity as data processors (e.g. internet service providers, data hosting and technical support providers, platform providers, email providers, security service providers, etc.) and contractually subject to our instructions, only for the lawful purposes described and for the period of time strictly necessary for this purpose. In particular, this involves giving access to your data to providers, as well as to the companies they subcontract, which help to fulfill the purpose described in this Policy and/or to communicate and be in contact with you (e.g., Microsoft as our provider of Office 365 and SharePoint tools).

In addition, in the event that there is a legal obligation or requirement to do so, we may communicate your data to the competent public authorities in accordance with such obligation or legal requirement. In this regard, Telefónica always guarantees the highest level of protection in the event that these third parties have access to your data and information.

When authorized subcontractors acting on behalf of Telefónica or the aforementioned recipients are located or process your data outside the European Economic Area, we will be carrying out an international transfer of your data in accordance with the provisions of data protection regulations. In general, we will avoid international data transfers, and your data will be processed within the European Economic Area. However, in the event that it is necessary to carry them out, we will adopt the organizational, technical and contractual measures that are necessary to guarantee the protection and security of your data, such as, for example, signing the European Commission's Standard Contractual Clauses with the authorized subcontractor or third party recipient, carrying out impact assessments on the relevant international data transfer to assess the risk and adopt measures to mitigate it, encryption of data in transit or at rest, pseudonymization of the data transferred, the possibility for the data subject to claim damages directly against the authorized subcontractor or third party recipient, etc.

8. What rights do you have as a data subject?

As a data subject, the regulations grant you certain rights over your data which, depending on how they apply, you may exercise against Telefónica. Below we detail which they are and how you can exercise them. In addition, we inform you that on the website of the Spanish supervisory authority (www.aepd.es) you can find further information on the characteristics of these rights and download templates for exercising each of them.

- **Right to withdraw the consent:** It is your right to withdraw the consent given for the processing of your data for the purposes that are legitimized on that basis, at any time and in an easy way.
- **Right of access:** it is your right to ask us for details of the data we hold about you and how we process it, as well as to obtain a copy of it.
- **Right to rectification:** It is your right to obtain the rectification of your inaccurate or erroneous data, as well as to complete incomplete data.
- **Right to erasure:** It is your right to request deletion or suppression of your data and information in certain circumstances. However, please note that there are certain occasions when we are legally entitled to continue to store and process your data, such as compliance with a legal data retention obligation.
- **Right to restriction of processing:** It is your right to restrict or limit the processing of your data in certain circumstances. For example, if you apply data erasure, but instead of erasing it, you would prefer that we block it and process it only for record-keeping purposes because you will need it later to file a complaint. Again, please note that there may be times when we are legally entitled to refuse your request for restriction.
- **Right to object:** It is your right to object to us processing your data for a specific purpose, in certain circumstances provided for in the regulations and related to your personal situation.
- **Right to data portability:** It is your right to ask us to receive your personal data in a structured, commonly used, machine-readable and interoperable format and to transfer it to another data controller, provided that we process your data by automated means.
- **Right not to be subject to automated individual decision-making:** It is your right to ask us, in certain circumstances, not to make you subject to a decision based solely on automated processing of your data, including profiling, that produces legal effects on you or similarly significantly affects you.

In general, you can exercise them at any time and free of charge by contacting Telefónica at gdp-comms.tech@telefonica.com and indicating "Telefónica DSA" in the subject line. To do this, it is important to bear in mind that when you exercise a right, in most cases, you must clearly specify which one you exercise and, if applicable, provide a copy of a document proving your identity.

Any exercise of rights shall be answered within a maximum period of one month, which may be extended by two months if necessary, taking into account the complexity of the request and the number of requests.

Finally, in the event that you do not agree with the way in which your data is handled by Telefónica, you have the right to lodge a complaint with the national supervisory authority by contacting the Spanish Data Protection Agency, whose contact details are as follows:

Agencia Española de Protección de Datos
C/ Jorge Juan, 6 – C.P. 28001, Madrid (Spain)
www.aepd.es

9. How is your data protected?

Telefónica cares about guaranteeing the security, secrecy and confidentiality of your data and personal information. That is why, as part of our commitment and in compliance with current legislation, we have adopted the most demanding and robust security measures and technical means to prevent their loss, misuse or access without your authorization. Proof of this are our information security certifications that are available for consultation at <https://telefonicatech.com/en/policies-certificates>

In addition, Telefónica undertakes to act quickly and responsibly in the event that the security of your data may be compromised, and to inform you if relevant.

10. Further processing of data and changes to the Privacy Policy

Telefónica reserves the right to update this Privacy Policy at any time. Such update will be made public by Telefónica, in any case, with the legally required notice prior to its entry into force.

For more information, you can consult the [Global Privacy Policy](#) and the [Global Security Policy](#) of the Telefónica Group, which also apply in general to our organization in its capacity as entity belonging to said business Group.

Privacy Policy updated as of February 2025.