

IMDEA Networks Privacy Policy



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PRIVACY POLICY

Responsible	IMDEA Networks Foundation + Who is responsible for my data?
Purpose	The management of the Foundation aims to provide research capabilities, technological development, and innovation in the field of Network Technology and Telematic Services, necessitating the processing of data from its staff, researchers, and professors, as well as suppliers. Data profiling is not conducted. +What data do we process?
Legitimacy	GDPR Article 6(1)(b) Most data processing is based on a contractual relationship (employment) or results from agreements (professors and researchers). Where the legal basis for processing is different, it will be specified, especially when based on consent, which will be explicitly given. + What is the legitimacy for processing my data?
Recipients	Data will not be transferred to third parties except in compliance with legal obligations or if necessary to respond to your request or manage your case. Transfers to third countries are not foreseen. +To which recipients will my data be communicated?
Rights	You may exercise the rights of access, rectification, erasure, opposition, restriction of processing, and data portability as explained in the additional information. Additionally, you will not be subject to automated individual decision-making. + What rights do you have and how can you exercise them?
Additional Information	IMDEA Networks Foundation approved its Security Policy on May 20, 2024, in accordance with Royal Decree 311/2022, of May 3, and under the guidelines of the Compliance Certification in the National Security Scheme (ENS), to ensure the adoption of appropriate measures to ensure confidential processing of data. Guaranteed are its integrity, availability, authenticity, and traceability based on periodically conducted risk analyses. +Are my data secure?

IMDEA Networks Foundation recognizes that data protection is a fundamental right of individuals and primarily involves the power to control and dispose of personal data. This enables the individual to decide which of their data to provide to a third party, whether a public authority or a private entity, or which such third party may collect, and also allows the individual to know who holds their personal data and for what purpose, with the ability to oppose such possession or use.

IMDEA's privacy policy is oriented towards complying with current legislation on the processing of personal data (EU Regulation 679/2016, General Data Protection Regulation, hereinafter GDPR) and Organic Law 3/2018, of December 5, on Personal Data Protection and the guarantee of digital rights, as well as other regulations, particularly the interpretive criteria of the Spanish Data Protection Agency. All processing is based on the "principles relating to processing" established by the GDPR:

- **Principle of "lawfulness, fairness, and transparency"** which ensures that data are processed lawfully, fairly, and transparently in relation to the data subject.
- **Principle of "purpose limitation"** which entails the obligation to process data for specific, explicit, and legitimate purposes and prohibits processing data collected for specific purposes in a manner incompatible with those purposes.
- **Principle of "data minimization"** which involves applying technical and organizational measures to ensure that only data necessary for each specific processing purpose are processed, thereby reducing the extent of processing, limiting the retention period as necessary, and restricting accessibility.
- **Principle of "accuracy"** which requires controllers to have reasonable measures in place to ensure data are up-to-date, and to delete or amend them without delay when they are inaccurate in relation to the purposes for which they are processed.
- **Principle of "storage limitation"** which is a manifestation of the data minimization principle. Data retention must be time-limited to the achievement of processing purposes. Once these purposes have been fulfilled, the data should be erased, blocked, or anonymized, i.e., stripped of all elements that allow the identification of data subjects.
- **Principle of "integrity and confidentiality"** which requires data processors to conduct risk analyses to determine the necessary technical and organizational measures to ensure the integrity, availability, and confidentiality of the personal data they process.
- **Principle of "accountability"** which obliges controllers to maintain due diligence permanently to protect and guarantee the rights and freedoms of natural persons whose data they process, based on an analysis of the risks posed by the processing to these rights and freedoms, thereby ensuring and demonstrating compliance with the provisions of the GDPR and LOPDGD.

a. Who is responsible for processing my personal data?

Identity:	IMDEA Networks Foundation
Tax ID (CIF)	G84912708
Address	Avda. Mediterráneo, 22; 28918 Leganés (Madrid), España
Email	info.networks@imdea.org
Phone	+34 91 481 62 10 Fax: +34 91 481 69 65
Data Protection Officer	dpo.networks@imdea.org

b. What personal data do we process?

IMDEA Networks Foundation processes the following categories of personal data:

- For individuals who sign contracts and agreements:
- Identifying data: Name and surname, email address, telephone number. For employees, bank account details, as well as academic and professional information: degrees, training, and professional experience. Workday registration.
- Data of suppliers (natural persons).
- Data of trustees and candidates.

IMDEA Networks Foundation publishes on its website the Record of Processing Activities, which details each of the procedures and data processed and other information required by law.

c. For what purpose do we use the data?

IMDEA processes personal data for one or more of the following purposes, always within its competencies, which will lead to:

- Managing employment relationships with employees, as well as those derived from agreements with professors and researchers.
- Managing the selection processes for candidates or temporary employment pools.
- Achieving the highest capacity for research, technological development, and innovation in the field of Network Technology and Telematic Services, as the foundation's own purposes.

d. How long do we keep the data?

Personal data will be kept for the time necessary to fulfill the purpose for which they were collected and to determine any potential responsibilities that may arise from such purpose and data processing.

Once the aforementioned period has been concluded, the retention will be subject to the terms established primarily by the statute of limitations for actions, especially in the Civil Code (article 1961 and following).

When data processing is based on express consent, it will comply with the requirements of current regulations regarding the withdrawal of consent, taking the general criterion of the statute of limitations for actions. They will be retained as long as the citizen does not revoke the consent given. Revocation will not affect the lawfulness of the processing carried out prior to the revocation.

Are there any processing activities that involve profiling?

There are no automated data processing activities that involve using personal data to evaluate certain personal aspects of employees or citizens, to analyze or predict aspects concerning professional performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements of such individuals. If any processing were to use this profiling, individuals would be informed about it.

Who can provide personal data?

Only individuals over 14 years old can provide personal data. Minors under this age must have

the consent of their parents or legal guardians, as well as in all those procedures that require it, within the capacity of legal age, to act in the specific procedure.

IMDEA Foundation, when requests are made by any means in which the interested party declares personal data, may carry out the necessary verifications to check the accuracy of the data in the exercise of its competencies.

e. What is the legitimization for data processing?

The legitimization for the processing of data by the IMDEA Networks Foundation is generally based on a contractual relationship as an employer, and therefore the legal basis is established under Regulation (EU) 2016/679, art. 6.1.b).

This does not preclude that consent may be required in certain procedures. However, in each procedure, the legal basis for the collection of personal data will be identified.

The basic state and regional regulations that justify the legitimization of the processing of personal data, which is complemented by that indicated in each procedure or service, are detailed below, without exhausting the matter since in each of the treatments and in the Register of Activities of this Foundation. It is significant:

- Law 1/1998, of March 2, on Foundations of the Community of Madrid.
- Law 50/2002, of December 26, on Foundations.
- Law 39/2015, October 1, on the Common Administrative Procedure of Public Administrations.
- Law 40/2015, of October 1, on the Legal Regime of the Public Sector.
- Organic Law 3/1983, of February 25, on the Statute of Autonomy of the Community of Madrid.
- Law 40/2015, of October 1, on the Legal Regime of the Public Sector.
- Law 9/2017, November 8, on Public Sector Contracts.

In any case, the determination of the legitimization for data processing is specified in the informative clauses corresponding to each procedure or service.

f. To which recipients will the data be communicated?

Personal data will only be communicated to public authorities under a legal obligation for the exercise of their official mission, such as tax and customs authorities, financial investigation units, and independent administrative authorities, among others. These entities will not be considered data recipients if they receive personal data necessary to carry out a specific investigation of general interest, in accordance with Union law or national legislation.

Requests for data communication from authorities must always be submitted in writing, be motivated, occur on an occasional basis, and must not refer to an entire file or lead to the interconnection of several files.

g. What rights do you have and how can you exercise them?

As a citizen, you can exercise the following rights at the IMDEA Networks Foundation, which will provide you with the appropriate forms and an easy and efficient procedure:

IMDEA Networks Institute

Avenida del Mar Mediterraneo, 22 • 28918 Leganes (Madrid) • SPAIN

phone +34 91 481 6210 • fax +34 91 481 6965 • e-mail info.networks@imdea.org

- **Access your personal data:** Obtain confirmation on whether your data is being processed and receive information about the specific processing.
- **Rectify your data** when it is inaccurate or incomplete.
- **Request the deletion or cancellation of your data** when, among other reasons, they are no longer necessary for the purposes for which they were collected.
- **Object at any time to the processing of your personal data.**
- **Request the limitation of the processing of your data** when one of the conditions provided in the regulations occurs.
- **Request the portability of your data:** Right to receive the data you have provided in a structured, commonly used, and machine-readable format, or that they be transmitted directly to a third party in cases established by current regulations.
- **Prevent being subject to automated decisions:** Right not to be subject to a decision based solely on automated processing of your data, including profiling, which produces legal effects or similarly significantly affects you.
- **Withdraw consent granted,** when processing is based on consent, without affecting the lawfulness of processing based on consent before its withdrawal.

Forms to exercise your rights:

You can exercise your rights using the corresponding forms and may act through a representative in accordance with the law.

Where can you submit your request to exercise your rights?

This request, proving your identity or representation, can be made:

- **In person at the offices of the IMDEA Networks Foundation.**
- **By postal mail addressed to the entity.**
- **By email.**

What happens if your rights were not properly addressed?

If you believe that your rights were not properly addressed, prior to filing a complaint against the IMDEA Networks Foundation with the Spanish Data Protection Agency, you may contact the data protection officer of this entity: dpo.networks@imdea.org

In this case, the data protection officer of the IMDEA Networks Foundation will inform you of the decision taken within a maximum period of two months from the receipt of the complaint. Additionally, without prejudice to other remedies, you have the right to lodge a complaint with the Spanish Data Protection Agency as the competent Control Authority when you consider that the Foundation has violated the rights that the data protection regulations recognize in you, either through the Electronic Office of the Spanish Data Protection Agency or at the postal address C/ Jorge Juan, 6. 28001 Madrid. Tel. 912 663 517.

h. Are the data secure? What security measures does the website have?

IMDEA Networks guarantees the adoption of appropriate measures to ensure the confidential processing of data, given their confidential nature, their integrity, availability, authenticity, and traceability based on the risk analysis performed by this Corporation, which is reviewed

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periodically.

IMDEA Networks commits to keeping such data secret, treating it with the utmost confidentiality, and declares that it has implemented in its information system the security policies appropriate to the type of data handled in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) and the National Security Scheme and the applicable regulations.

It also aligns with its Security Policy, approved by its Information Committee on May 30, 2024, where it is obligated to apply the information security measures in accordance with the National Security Scheme, as well as to continuously monitor service delivery levels, track and analyze vulnerabilities, and prepare an effective response to incidents to ensure the continuity of the services provided.

All members of the IMDEA Networks Foundation must be aware that information security is an integral part of each stage of the life cycle of information systems, from their conception to their decommissioning, including development decisions, component acquisition, contracting of external services, and operation. Security requirements and funding needs must also be identified and included in planning, as well as in the tender documents.

What regulations apply?

Basic applicable regulations in Data Protection:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons regarding the processing of personal data and on the free movement of such data.
- Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights
- Royal Decree 311/2022, of May 3, regulating the National Security Scheme.