



PRIVACY POLICY

Revision:	01
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Revision Date:	30/01/2025

PRIVACY POLICY

1. Introduction

This Privacy Policy has been approved by the Board of Directors of Grup Cañigueral I.M.P. S.L., which operates under the brand name COSTA BRAVA MEDITERRANEAN FOODS, (hereinafter, the “Group”, CBMF” or the “Organisation”). It is committed to respecting the protection of personal data as established in the EU’s Charter of Fundamental Rights and in the domestic regulations in force.

Therefore, the Organisation has adopted the technical measures required to maintain a level of security that endeavours to prevent the loss of and unauthorised access to the personal data of anyone who discloses them to the Organisation.

2. Purpose and scope

This Policy is intended to ensure that the personal data of the users of the Organisation’s websites and social media, whoever visits its facilities or whoever exchanges online messages or telephone calls with any of CBMF’s departments (such as customers and consumers, job applicants, suppliers, and goods and service providers, etc.) are treated as stipulated by the laws in force.

The transfer of personal data in the cases outlined in the previous paragraph means that the provisions contained in this Privacy Policy have been accepted and that personal data will be processed as set forth in it.

It should be noted that although there may be links from CBMF’s own websites to other websites or social media platforms, CBMF’s Privacy Policy does not apply to those belonging to other organizations whose content is not controlled by the Group. Naturally, the Group also accepts no responsibility for the content of third-party websites or social media platforms.

3. Basic information on personal data processing

Regulation (EU) 2016/679 and Organic Law 3/2018, of 5 December, on Personal Data Protection and the Safeguard of Digital Rights (the “LOPD”).

GRUP CAÑIGUERAL IMP. S.L.
COSTA BRAVA MEDITERRANEAN FOODS

Data controller

GRUP CAÑIGUERAL IMP. S.L. NIF: B17082454
Address: C/ Roselló 10. Cassà de la Selva (Girona)

Purpose of data processing

To provide and invoice services related to meat products.

Legitimate basis

The consent obtained from data subjects.
Performance of service agreements.

Recipients

Personal data will not be disclosed to third parties, unless required by law or if necessary to fulfil the purpose of data processing.

Rights of data subjects

Data subjects are entitled to exercise their rights of data access, rectification, restriction, erasure, portability and objection by sending a request to do so to our registered address.

Data retention period

For as long as a business relationship is maintained or for the number of years required to comply with legal obligations.

Claims

Data subjects may address the Spanish Data Protection Agency to lodge a claim if they feel that their rights have been violated.

Additional information

You may consult additional information in the questions on privacy below.

4. Questions on privacy

In compliance with Regulation (EU) 2016/679 of the European Parliament of the Council of 27 April 2016 ("GDPR"), the following information is provided about personal data processing.

4.1 Who is the data controller?

GRUP CAÑIGUERAL IMP. S.L. NIF: B17082454
Address: C/ Roselló 10. Cassà de la Selva (Girona)
Email: dadesprotec@costabravafoods.com

4.2 Why are personal data processed?

- This information is provided to render and invoice the services of the Organisation's four business divisions: Livestock Production, Fresh Products, Elaborated Products and Cured Product.
- Subsequent to data subjects giving additional consent, their personal data may be processed to send them information about activities, products and services.
- When visitors are admitted to the Organisation's facilities, they may be filmed on CCTV for security screening reasons.
- When CVs are submitted for job applications, the personal data on them will be processed in order to manage the CV database for the selection of personnel.

4.3. How long will personal data be kept on record?

- The personal data submitted will be kept on record for as long as someone uses the Organisation's services or wishes to receive information. Subsequently, they will be retained for the terms established for fulfilling legal obligations.
- Pictures filmed on CCTV will be kept for one month.
- In the case of CVs, personal data will be kept on record for one year.

4.4 What is the legitimate basis for processing personal data?

The legitimate basis for processing them is the performance of service agreements and the consent given by data subjects.

Insofar as the filming of images on CCTV is concerned, the legitimate basis stems from the lawful interest of protecting the security of individuals and property.

4.5. To which recipients will personal data be disclosed?

Personal data will not be disclosed to third parties, unless required by law or if necessary to fulfil the purpose of data processing.

4.6 What are the rights of data subjects?

- All data subjects are entitled to obtain confirmation of whether or not their personal data are being processed.
- Data subjects are entitled to access their personal data and to seek the rectification of inaccurate data or, where applicable, request their erasure when, among other reasons, the data are no longer required for the purposes for which they were collected.
- Under certain circumstances, data subjects may seek the restriction of the processing of their data, in which case the Organisation can only keep them to lodge or defend itself against claims.
- Under certain circumstances for reasons related to their personal situation, data subjects may object to the processing of their data. In such cases, the Group will no longer process the personal data in question, unless there are compelling legitimate grounds for doing so, or to lodge or defend itself against potential claims.
- Data subjects are also entitled to the portability of their data.
- Lastly, data subjects are entitled to lodge a claim with the competent supervisory authority.

4.7. How can you exercise your rights?

By sending a letter or a message with a copy of a document that identifies you to the physical or email address found in section 4.1.

4.8. How have your personal data been obtained?

The personal data that the Organisation processes come from data subjects. Data subjects must ensure that the personal data they provide are true and they must report any changes made to them. Data marked with an asterisk are required fields in order to be able to provide a service requested.

4.9 What personal data are processed?

The data categories that may be processed in providing a service are:

- Identification details
- Postal and email addresses

In the case of CCTV:

- Pictures

In the case of CVs:

- Personal characteristics
- Academic and employment details

The personal data are restricted, as only those required for providing services and managing CBMF's business are processed.

4.10. What security measures are used?

Those established in article 32 of the GDPR, namely, the security measures required to ensure a level of security suitable for the risk entailed by the processing of data by the Company, with mechanisms that allow the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

These measures include:

- Providing information about personal data processing policies.
- Making routine backups.
- Controlling the access to data.
- Performing regular verification, evaluation and assessment processes.

REVISION HISTORY:

Revision	Date	Description of changes
00	15/02/2023	The Privacy Policy was created to show the commitment to observing the protection of personal data. The measures required to have a high level of security and privacy to prevent the loss of and unauthorised access to personal data are set out in this Policy.
01	30/01/2025	Revision of the document to assess potential changes to it. This revision history has been added to this document so that there is a public record of changes made to it.

Girona, 30 January 2025



Signed: Elisabet Cañiguerà Borràs
President of GRUP CAÑIGUERÀ IMP SL - COSTA BRAVA
MEDITERRANEAN FOODS