

# PRIVACY POLICY

## 1. PURPOSE

This Privacy Policy is intended to inform you as a User of the conditions under which the Fundació Institut de Recerca en Energia de Catalunya (IREC) collects and processes your personal data through the website [www.irec.cat](http://www.irec.cat) (hereinafter, the "Website").

## 2. DATA CONTROLLER

The controller responsible for processing the personal data collected through the Website is:

- **Registered name:** Fundació Institut de Recerca en Energia de Catalunya (IREC)
- **Tax identification number (NIF):** G-64946387
- **Postal address:** Jardins de les Dones de Negre, 1, 2nd floor, 08930, Sant Adrià de Besòs (Barcelona)
- **Contact:** IREC has appointed a Data Protection Officer (DPO). You may contact them at [dpo@irec.cat](mailto:dpo@irec.cat).

IREC undertakes to process personal data in accordance with Regulation (EU) 2016/679 of 27 April 2016 (GDPR), Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD) and any other applicable data protection legislation in force, and Law 34/2002 of 11 July on Information Society Services and Electronic Commerce (LSSICE), having adopted the necessary technical and organisational measures to guarantee the security of your data and prevent its alteration, loss, processing or unauthorised access.

### 3. PURPOSES OF PROCESSING, DATA PROCESSED AND LEGAL BASIS

We will only process your personal data for the purposes described below, in accordance with the legal bases indicated and, where applicable, on the basis of your consent, obtained in advance, freely, specifically, informedly and unambiguously. You may withdraw your consent at any time without retroactive effect.

Purpose of processing	Data processed	Legal basis
Managing enquiries and requests for information received through the contact form or by email.	Name, surname, email address and content of the enquiry.	Consent of the data subject (Art. 6(1)(a) GDPR) given upon submission of the form.
Managing participation in staff selection processes, both current and future, where the candidate's profile may be suitable.	Name, surname, email address, CV and data contained therein.	Pre-contractual measures at the request of the data subject (Art. 6(1)(b) GDPR).
Managing the subscription and periodic sending of our newsletter by email with news, updates and events related to IREC. In addition, data may be used in aggregate form for statistical purposes and to conduct satisfaction surveys, with the aim of evaluating and improving the quality of our bulletin.	Email address and, optionally, name and surname.	Consent of the data subject upon ticking the acceptance box and completing the subscription process (Art. 6(1)(a) GDPR).
Ensuring the security and proper functioning of the Website and analysing its usability.	Browsing data, IP address and technical device data / cookie identifiers.	Legitimate interest of IREC (Art. 6(1)(f) GDPR) in ensuring security and improving the user experience.

		Consent of the User (Art. 6(1)(a) GDPR) obtained via the cookie banner/panel. Analytical cookies will not be activated until you provide your consent.
Managing our presence and interaction on IREC's official social media profiles.	Data from the User's public profile and any data the User provides when interacting with our profiles.	Consent of the data subject (Art. 6(1)(a) GDPR) upon interacting with our profiles. Processing is carried out jointly with each platform, in accordance with their terms.

We will not process your personal data for purposes not described here, except where required by law or court order. We do not process special categories of data, nor are automated decisions taken — including profiling — that produce legal effects or similarly significantly affect you.

### How long will we retain your data?

Personal data collected will be retained for the time strictly necessary to fulfil the purpose for which it was collected, for as long as it is necessary to manage and provide the services requested and — where you have previously authorised us — until you instruct us to stop, and to determine any liabilities that may arise. The following specific retention periods apply:

- **Enquiries and requests:** Retained only for the time strictly necessary to manage and respond to your request.
- **Applications (CV):** Retained for a maximum period of two (2) years from receipt for future selection processes, unless the candidate requests deletion beforehand. Once this period has elapsed, we will proceed to their secure deletion, guaranteeing full respect for confidentiality. If you wish to continue participating in our selection processes after this period, you will need to send us your CV again.
- **Newsletter subscription:** Your data will be retained until you withdraw your consent or request to unsubscribe from the service.

- **Browsing data:** Retention periods are governed by the provisions of our Cookie Policy.
- **Social media interaction:** Retention will depend on the privacy policies of each social network, over which IREC has no control.

Once the retention periods have elapsed, data will be securely deleted, without prejudice to their retention during the applicable statutory limitation periods for the purposes of addressing any potential legal liabilities.

### **Sending a curriculum vitae**

If you send us your curriculum vitae (CV) through the channels provided on our Website (such as email or specific forms), we inform you that the data you provide will be processed by IREC for the purpose of managing your participation in staff selection processes, both current and future, in which your professional profile may be suitable.

Please note that this is the only official procedure for accepting your CV, and CVs submitted through other means will not be accepted. Should any of your details change, we kindly ask that you notify us in writing as soon as possible so that we may keep them duly updated.

### **Additional information on processing**

Failure to provide personal data marked as mandatory may result in the inability to process your request or manage the corresponding service. In compliance with Law 34/2002 of 11 July on information society services and electronic commerce, IREC does not engage in spam practices and will not send you commercial emails that have not been previously requested or authorised by you. Each communication will provide you with a simple and free means of withdrawing your consent and unsubscribing.

## 4. RECIPIENTS OF DATA

As a general rule, IREC will not share your personal data with third parties, except where required by law. However, for the proper functioning of the Website and the provision of our services, we work with providers who act as data processors, processing your data on our behalf and under our instructions:

- **Web hosting services:** Provided by Nominalia Internet, S.L., with NIF B61553327 and registered address at Calle Uldecona, 21, 1st floor, 08038, Barcelona.
- **Web analytics services:** We use Google Analytics to obtain metrics on how users interact with the Website via cookies, provided by Google Inc., with registered address at 1600 Amphitheatre Parkway, Mountain View, California, CA 94043, United States. The use of this service involves an international transfer of data to the United States, which is carried out under the European Commission's adequacy decision (EU-US Data Privacy Framework), guaranteeing a level of data protection equivalent to that in Europe.
- **Newsletter and commercial communications services:** For the management and sending of our news newsletter, we use Mailchimp, provided by The Rocket Science Group LLC, with registered address at 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, United States. The use of this service involves an international transfer of your data (email address and name, if provided) to the United States. This transfer is likewise covered by the European Commission's adequacy decision (EU-US Data Privacy Framework), guaranteeing a level of data protection equivalent to that in Europe.
- **Internal whistleblowing channel management services:** We use Whistleblower Software, provided by Whistleblower Software ApS, with registered address at Nørre Voldgade 14B, 1358, Copenhagen, Denmark. The use of this service may involve an international transfer of data if data is processed outside the European Economic Area. In any event, the transfer will be carried out with appropriate safeguards as required by data protection legislation, such as standard contractual clauses approved by the European Commission.

IREC ensures that all data processors provide sufficient guarantees and sign the data processing agreements required under Article 28 of the GDPR.

## 5. RIGHTS OF DATA SUBJECTS

As an interested User, you have the following rights:

- **Right of access:** allows you to obtain information about your personal data being processed.
- **Right to rectification:** allows you to correct errors and modify data that prove to be inaccurate or incomplete.
- **Right to erasure:** allows you to request the deletion of your data when, amongst other reasons, it is no longer necessary for the purposes for which it was collected.
- **Right to object:** the right to prevent the processing of your personal data or to request that such processing cease.
- **Right to restriction of processing:** involves the marking of retained personal data with a view to limiting its future processing, for the establishment, exercise or defence of legal claims.
- **Right to data portability:** provision of the data being processed to the data subject, so that they may transfer it to another controller without hindrance.
- **Right not to be subject to automated individual decision-making (including profiling):** the right not to be subject to a decision based solely on automated processing that produces negative effects or significantly affects you in a similar way.

You may exercise your rights free of charge by sending an email to [dpo@irec.cat](mailto:dpo@irec.cat), indicating in the subject line "Exercise of data protection rights" and specifying the right you wish to exercise or the consent you wish to withdraw. To verify your identity, we may request additional information if there are reasonable grounds for doubt.

If you consider that your rights have not been duly addressed, you have the right to lodge a complaint with the competent supervisory authority, the Autoritat Catalana de Protecció de Dades (APDCAT) or the Agencia Española de Protección de Datos (AEPD).

As a User, you have the right to withdraw at any time the consent you have given us for any of the purposes for which we process your personal data. Withdrawal will not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal. Once we receive your request, we will

cease processing your data for the purpose or purposes you have indicated, unless we are required to continue doing so by law.

## 6. PROCESSING OF DATA RELATING TO MINORS

The processing of personal data of a minor may only be based on their consent where they are over the age of fourteen (14).

The processing of data relating to minors under the age of fourteen (14) will require the consent of the holder or holders of parental authority or guardianship, who are ultimately responsible for all acts carried out by the minors in their care. IREC will not intentionally collect or process personal data from minors under the age of fourteen (14) without obtaining such consent. Should we at any point become aware that we have received data from a minor under 14 without the required authorisation, we will take the necessary steps to delete it.

Parents, guardians or legal representatives are reminded that it is their responsibility to supervise the use that minors in their care make of the Internet. Accordingly, it is for them to determine which content and services are or are not appropriate for the minor's age and, where applicable, to use parental control tools (software, filters and blocks) to restrict access to content they consider unsuitable.

## 7. SOCIAL MEDIA

IREC maintains official profiles on various social media platforms (including LinkedIn, X (formerly Twitter), Facebook, Instagram and YouTube). The processing of personal data of Users who interact with these official profiles (for example, by becoming followers, posting comments or sending messages) is governed by the provisions of this section, as well as by the privacy policies and terms of use of each social network, which the User has previously accepted. In this context, IREC acts as joint controller of the data you share when interacting with our profiles, together with the company that owns the relevant social network.

We will process your data (username, profile picture, comments, messages and other interactions) for the following purposes:

- Managing our presence on the social network appropriately.
- Providing information on IREC's activities, projects, services and news.
- Engaging with the follower community and responding to enquiries, comments or requests.
- Analysing interaction statistics in aggregate and anonymous form to improve our communications.

The legal basis is your consent, expressed through your voluntary interaction, as well as IREC's legitimate interest in promoting its activities and maintaining a communication channel with its community.

You undertake not to publish content that:

- Is presumably unlawful under national, EU or international law, or that promotes unlawful activities or contravenes the principles of good faith.
- Infringes fundamental rights, human dignity, honour, privacy or one's own image.
- Contains offensive, defamatory, violent or discriminatory comments, or that may give rise to unjustified negative opinions.
- Infringes the intellectual or industrial property rights of IREC or third parties.
- Contravenes the principles of legality, honesty, responsibility, protection of public order and protection of minors.

IREC reserves the right to remove, without prior notice, any content from its official social media profile that it considers inappropriate or that infringes these rules, the law or the rights of third parties. IREC accepts no responsibility for the security measures or data processing carried out by the social media platform itself. If you wish to learn about such conditions, please consult the privacy policies and specific terms of the relevant social network.

## **8. CHANGES TO THIS PRIVACY POLICY**

IREC reserves the right to amend this policy in order to adapt it to legislative or case law developments. We recommend that you review this page periodically. Should any substantial changes occur that affect your rights or the way in which we process your data, IREC will make reasonable efforts to inform you of such changes, it being sufficient to publish them on this Website.

## **9. APPLICABLE LAW AND JURISDICTION**

Any disputes or matters relating to this website and the activities carried out on it shall be governed by Spanish law, to which the parties expressly submit, with the Courts and Tribunals of Barcelona having jurisdiction over all disputes arising from or related to its use.