Information about the Privacy Policy

This document governs the Privacy Policy of the *RELANZA*. *Redefining Language Teaching: SDGs and Innovative Educational Strategies* project website, owned by UNIVERSIDAD INTERNACIONAL DE LA RIOJA, S.A. (hereinafter referred to as "UNIR" or the "Website"). It also provides comprehensive data protection information in compliance with Articles 13 and 14 of the General Data Protection Regulation (GDPR) and Article 11 of the Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (Spain).

Information about UNIR

UNIR is a Spanish private university (recognised as such under Law 3/2008, of 13th October, passed by the Parliament of La Rioja, and Decree 69/2009, of 31st July - BOR No. 96 of 5th August 2009). It offers both distance and on-site online education, headquartered in Logroño, with additional presence in Mexico, Colombia, Ecuador, and Peru.

Data Controller

• Corporate Name: UNIVERSIDAD INTERNACIONAL DE LA RIOJA, S.A.

• Tax ID: A-26430439

Address: C/ de García Martín, 21, Pozuelo de Alarcón, 28224, Madrid, Spain

Email: ppd@unir.net

Data Protection Officer

• Name: Miguel Crespo Toledo

• **Phone:** (+34) 915 674 391 (Ext. 3216)

Address: C/ de García Martín, 21, Pozuelo de Alarcón, 28224, Madrid, Spain

• Email: miguel.crespo@unir.net

Application of this Privacy Policy

This Privacy Policy applies to all data processing carried out by UNIR in relation to users accessing or contacting UNIR through the *RELANZA* Project Website. It also applies to any other data processing activities undertaken by UNIR.

Purposes of Processing and Legal Bases

This section sets out the general purposes and legal bases applicable to the processing of personal data carried out by UNIR:

- Contractual performance and pre-contractual measures (Article 1.b) GDPR):
 - 1. To provide the contracted service or formalise the established relationship.
 - 2. To carry out the proposal requested by the data subject.
 - 3. To maintain the necessary communications to uphold the contractual relationship.

• Compliance with a legal obligation (Article 1.c) GDPR):

To disclose information to public authorities, regulators, or governmental bodies where required by law, local regulations, or in compliance with regulatory obligations.

- Legitimate interest of the data controller (Article 1.f) GDPR):
 - Processing of contact details of company representatives or individuals for professional purposes, in accordance with the services provided (in line with Article 19 of the Spanish Organic Law on Data Protection - LOPDGDD).

To ensure maximum transparency, you can review each of the purposes for which we process your data by clicking <u>here</u> (available in Spanish), as well as the corresponding legal basis for each processing activity, under your status as a data subject.

Please be advised that all data requested by UNIR, or that may be requested in the future, are necessary for the purposes described in this Privacy Policy. Failure to provide such data may result in our inability to contact you or process your request. UNIR also reserves the right not to respond to or handle requests that lack the required data. Fields marked with an asterisk (*) are mandatory; if you do not provide these, we may not be able to deliver the service or respond to your query or request.

You are responsible for ensuring that the personal data you provide to UNIR are accurate and up to date. As such, UNIR may request, from time to time, a review and update of the personal data it holds about you.

Please also note that simply browsing this Website does not generally involve the processing of your personal data, except in specific cases such as your IP address and browsing behaviour, which may be processed for the purposes of managing and optimising the Website. This is done under UNIR's legitimate interest in maintaining the security and integrity of the Website.

Data subject rights

You have the right to exercise the rights granted to you under current data protection legislation, which include (available in Spanish):

- The right to request access to the personal data held about you.
- The right to request the rectification of inaccurate or incomplete data.
- The right to request the erasure of your data.
- The right to request the restriction of processing.
- The right to object to the processing of your data.
- The right to data portability.
- The right not to be subject to automated individual decision-making.
- The right to withdraw consent at any time.

To facilitate the exercise of your rights, we have enabled a preferences centre that allows you to manage them easily and according to your interests.

In any case, you may contact us by submitting a request addressed to UNIVERSIDAD INTERNACIONAL DE LA RIOJA, S.A., at C/ de García Martín, 21, Pozuelo de Alarcón, 28224, Madrid, Spain, or by email to ppd@unir.net, attaching a copy of your ID card or other documentation verifying your identity. You may also access the relevant rights request forms by clicking on each individual right.

Finally, if you require more information about your data protection rights or wish to lodge a complaint, you may contact the Spanish Data Protection Agency (AEPD) at Calle Jorge Juan, 6, 28001 Madrid, or visit their website at www.aepd.es (available in Spanish).

Data retention periods

In accordance with Article 5.1.e) of the General Data Protection Regulation (GDPR), the retention period of your data will depend on the duration of your relationship with UNIR and the legally established timeframes. UNIR determines <u>data retention periods</u> (available in Spanish) based on legal, regulatory, and operational requirements, as well as the nature of the relationship with the relevant category of data subjects. Accordingly, your personal data will be retained for as long as any contractual or commercial relationship with UNIR remains in effect.

Once this relationship ends, your personal data will be deleted once all necessary actions have been taken to conclude any remaining obligations between the parties, including the completion of any required administrative procedures. However, if you have expressly consented to receive marketing communications or to participate in recruitment processes within other companies of the group, your data will be retained until you withdraw your consent or object to such processing.

Notwithstanding the above, your data may be retained in a securely blocked form, for the period in which legal liability may arise from the execution of the contractual or precontractual relationship, as well as for compliance with other legal obligations applicable to UNIR.

In this respect, UNIR guarantees that your data will not be processed unless required for the establishment, exercise, or defence of legal claims, or when required by Public Authorities, Courts, or Tribunals during the statutory limitation period of any rights or legal obligations.

Recipients of your data and international data transfers

The personal data you provide to UNIR may be disclosed to third parties to whom UNIR is legally obliged to provide information, such as public authorities, in order to comply with legal obligations and applicable regulations.

In addition, your data may be shared with third-party companies or service providers where the provision of services by UNIR requires the disclosure of personal data. In such cases, the appropriate data processing agreements have been signed with these third parties, in accordance with Articles 28 and 29 of the General Data Protection Regulation (GDPR).

Source of the data

The personal data processed by UNIR are obtained directly from the data subject.

Data security

UNIR has implemented appropriate policies and technical and organisational measures to safeguard and protect your personal data against undesirable actions such as unauthorised or unlawful access, accidental loss or destruction, damage, misuse, or unauthorised

disclosure.

UNIR also takes all reasonable precautions to ensure that employees who have access to

your personal data have received appropriate training in handling such data.

However, please note that the transmission of data over the Internet is not completely secure. As such, any transmission is carried out at your own risk. Although we will do our

best to protect your personal data, UNIR cannot guarantee the security of data transmitted

via our Website.

Supervisory authority

If you require further information about your rights under data protection law or wish to lodge a complaint, you may contact the Spanish Data Protection Agency (Agencia Española

de Protección de Datos - AEPD) at:

Address: Calle Jorge Juan, 6, 28001 Madrid, Spain

Website: www.aepd.es (available in Spanish)

Contacting UNIR

If you have any questions or concerns regarding the processing of your personal data, you

may contact UNIVERSIDAD INTERNACIONAL DE LA RIOJA, S.A. in writing at:

Address: Avda. de la Paz, 137, 26006 Logroño (La Rioja), Spain

Email: ppd@unir.net

Proeduca Group

The Proeduca Group is composed of several companies. However, it is PROEDUCA ALTUS,

S.A. (hereinafter referred to as the "Proeduca Group") that is entrusted with the management of personal data, technological administration, and the implementation of

appropriate technical and organisational security measures.

The Proeduca Group aims to maintain a centralised and unified approach to regulatory

compliance. To this end, it is necessary that, regardless of which group company you originally provided your data to, such data may be shared within the Group. This transfer is

carried out at all times under the strictest standards of security and confidentiality. The sole purpose of this transfer is the administrative management of personal data, and the

processing is carried out on the basis of the data controller's legitimate interest.

As you can see, although the Group consists of several companies, our goal is to offer you the highest standards of quality, compliance, and security, regardless of the specific company involved. At the same time, we aim to address your concerns and needs in a personalised way. For this reason, if you give your explicit consent, your personal data may be used in a centralised manner to contact you from any of the Group companies involved in the education sector, in order to assist you in selecting the learning options that best match your profile and interests.

You can view the list of education-related companies within the Group by clicking <u>here</u> (available in Spanish).

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