

## ACTIVITY LOG AS DATA CONTROLLER (GENERAL)

### 1. Identification of the Controlling organisation

In compliance with Regulation (EU) 2016/679 of 27 April 2016 (GDPR), the Controlling organisation is who will determine the purposes and means of the processing of personal data (Files).

Tax number	STOCKCROWD FANRAISING, S.L.
TIN	B67084558
Activity	FINANTIAL SERVICES
Address	c/ Bruc, 145 - Entlo. 2 08037 BARCELONA (Barcelona)
Telephone	93 676 14 17
E-mail	info@stockcrowd.com
Trademark	STOCKCROWD FANRAISING, S.L.
Web	stockcrowd.com
Email AEPD Notification	infodat@stockcrowd.com
Email exercise rights	infodat@stockcrowd.com
Legal representative	Sergio Pallares Nadal, Javier Villacampa Ecequiel
Security Officer (DSPO)	Sergio Pallares Nadal

### Identification of the Data Protection Officer (DPO)

Name	MICROLAB HARD, S.L.
Address	c/ Santiago Rusiñol 8 L. 11, 08750, Molins de Rei
Nif	
Telephone	
E-mail	infodat@stockcrowd.com
Web	

### 2. Identification of the personal data files processed on your own behalf

A file is a structured set of personal data accessible according to certain predetermined criteria and subject to to processing for a specific purpose.

Filing system	Description
1 PERSONNEL MANAGEMENT	Administrative and labor management of the personnel employed in the organization
2 CUSTOMER- PROMOTERS	Administrative and billing management of the promoters of the crowdfunding campaigns created and managed through the online platform.
3 TAX AND ACCOUNTING	Registration of tax and accounting obligations subject to economic activity
4 COMMERCIAL CONTACTS	Communication, information, advertising and sale of crowdfunding services. Includes web contacts and social networks.
6 SUPPLIERS	Administrative and supplier payment management. Related services and business relationships.
7 APPLICANTS	Employee applicants management

### 3. Register of processing activities

In compliance with Article 30 of Regulation (EU) 2016/679 of 27 April 2016 (GDPR), the Organisation will keep and maintain an up-to-date Register of processing activities carried out under their responsibility, electronically, which may contain:

- Name and contact details of the Controller and, where applicable, of the Joint Controller, of the Data Controller's Representative and of the Data Protection Officer (DPO).
- Purposes of the processing.
- Description of the categories of Data Subject.
- Breakdown of the categories of data.
- Categories of Recipient.
- Data transfers to third party countries, with identification of these with documentation of appropriate guarantees.
- Whenever possible:
  - Anticipated deadlines for the erasure of different categories of data.
  - General description of technical and organisational security measures.

Controllers, or their Representatives, should make the Register of activities available to the Spanish Supervisory Authority upon request.

This Register documents each of the Files described in section 2 and are detailed below. A general description of the technical and organisational measures implemented by design and by default in all the varying processing phases by the organisation is detailed at the end of the document.

## 1. PERSONNEL MANAGEMENT

Description	Administrative and labor management of the personnel employed in the organization
Purposes	Health and safety at work, Management of payslips, Human resources
Legitimacy	For the execution of a CONTRACT or pre-contract with the Data Subject
Categories of data subjects	Employees
Storage criteria	<b>Archived LONGER THAN NECESSARY to achieve the purpose</b> for LEGAL OBLIGATION
Processing system	Partially automated
<b>Categories of data</b>	
Identification data	National ID (DNI) or tax ID (NIF) number, Name and surnames, Postal or email address, Telephone, Image, Manual signature, Social Security or mutual fund number
Special or criminal data categories	Do not exist
Other type of data	Personal characteristics, Academics and professionals, Job details, Economic, financial and insurance, Transactions of goods and services
<b>Categories of recipients</b>	
Transfers	Banks and building societies, Insurers, Social Security bodies, Public authority with competence over the subject
International transfers	Do not exist

## 2. CUSTOMER- PROMOTERS

Description	Administrative and billing management of the promoters of the crowdfunding campaigns created and managed through the online platform.
Purposes	Accounting, tax and administrative management
Legitimacy	<b>Lawful processing WITHOUT CONSENT</b> in the LEGITIMATE INTEREST of the DATA CONTROLLER or Third Party
Categories of data subjects	Clients and users, Legal representative
Storage criteria	Archived INDEFINITELY as long as it is necessary to maintain the processing purposes
Processing system	Partially automated
<b>Categories of data</b>	
Identification data	National ID (DNI) or tax ID (NIF) number, Name and surnames, Postal or email address, Telephone, Manual signature
Special or criminal data categories	Do not exist
Other type of data	Job details, Commercial information, Economic, financial and insurance, Transactions of goods and services
<b>Categories of recipients</b>	
Transfers	Banks and building societies, Tax administration, Public authority with competence over the subject
International transfers	Do not exist

### 3. TAX AND ACCOUNTING

Description	Registration of tax and accounting obligations subject to economic activity
Purposes	Accounting, tax and administrative management
Legitimacy	<b>Lawful processing WITHOUT NEED FOR CONSENT</b> by LEGAL OBLIGATION of the Controller
Categories of data subjects	Employees, Clients and users, Suppliers
Storage criteria	<b>Archived LONGER THAN NECESSARY to achieve the purpose</b> for LEGAL OBLIGATION
Processing system	Partially automated
<b>Categories of data</b>	
Identification data	National ID (DNI) or tax ID (NIF) number, Name and surnames, Postal or email address, Telephone, Manual signature
Special or criminal data categories	Do not exist
Other type of data	Personal characteristics, Commercial information, Economic, financial and insurance, Transactions of goods and services
<b>Categories of recipients</b>	
Transfers	Banks and building societies, Tax administration, Public authority with competence over the subject
International transfers	Do not exist

#### 4. COMMERCIAL CONTACTS

Description	Communication, information, advertising and sale of crowdfunding services. Includes web contacts and social networks.
Purposes	Advertising and commercial research
Legitimacy	EXPLICIT consent for specified purposes
Categories of data subjects	Clients and users, Contact persons, Applicants
Storage criteria	Archived INDEFINITELY as long as it is necessary to maintain the processing purposes
Processing system	Automated
<b>Categories of data</b>	
Identification data	Name and surnames, Postal or email address, Telephone
Special or criminal data categories	Do not exist
Other type of data	Job details, Commercial information
<b>Categories of recipients</b>	
Transfers	Organisations or persons directly related to the data controller
International transfers	Do not exist

## 6. SUPPLIERS

Description	Administrative and supplier payment management. Related services and business relationships.
Purposes	Accounting, tax and administrative management
Legitimacy	<b>Lawful processing WITHOUT CONSENT</b> in the LEGITIMATE INTEREST of the DATA CONTROLLER or Third Party
Categories of data subjects	Suppliers, Contact persons
Storage criteria	Archived INDEFINITELY as long as it is necessary to maintain the processing purposes
Processing system	Partially automated
<b>Categories of data</b>	
Identification data	National ID (DNI) or tax ID (NIF) number, Name and surnames, Postal or email address, Telephone, Manual signature
Special or criminal data categories	Do not exist
Other type of data	Commercial information, Economic, financial and insurance, Transactions of goods and services
<b>Categories of recipients</b>	
Transfers	Organisations or persons directly related to the data controller, Banks and building societies, Tax administration, Public authority with competence over the subject
International transfers	Do not exist

## 7. APPLICANTS

Description	Employee applicants management
Purposes	Human resources
Legitimacy	UNEQUIVOCAL consent clearly indicated by the Data Subject
Categories of data subjects	Employees, Applicants
Storage criteria	Do not exist
Processing system	Partially automated
<b>Categories of data</b>	
Identification data	National ID (DNI) or tax ID (NIF) number, Name and surnames, Postal or email address, Telephone, Image, Manual signature
Special or criminal data categories	Do not exist
Other type of data	Personal characteristics, Social circumstances, Academics and professionals, Job details
<b>Categories of recipients</b>	
Transfers	Do not exist
International transfers	Do not exist

## TECHNICAL AND ORGANISATIONAL SECURITY MEASURES

### Premises or Offices

SEDE FISCAL	Measures	Risk
<b>Type of access to the premises</b>	Unrestricted entry with access control (reception staff, security guards, etc.).	Low risk
<b>General key control system</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures</b>	THERE ARE NO security measures.	Low risk

### Departments

DEPARTAMENTO TÉCNICO	Measures	Risk
<b>Permit:</b>	Limited to authorised staff in the workstations and document archives.	Low risk
<b>Access:</b>	Access to the Department governed by the security measures of the Premises.	Low risk
<b>Password control:</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures:</b>	THERE ARE NO other security measures.	Low risk

PROYECTOS	Measures	Risk
<b>Permit:</b>	Limited to authorised staff in the workstations and document archives.	Low risk
<b>Access:</b>	Access to the Department governed by the security measures of the Premises.	Low risk
<b>Password control:</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures:</b>	THERE ARE NO other security measures.	Low risk

DESARROLLO DE NEGOCIO	Measures	Risk
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<b>Permit:</b>	Limited to authorised staff in the whole Department.	Low risk
<b>Access:</b>	Access to the Department governed by the security measures of the Premises.	Low risk
<b>Password control:</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures:</b>	THERE ARE NO other security measures.	Low risk

SOPORTE A CLIENTES	Measures	Risk
<b>Permit:</b>	Limited to authorised staff in the workstations and document archives.	Low risk
<b>Access:</b>	Access to the Department governed by the security measures of the Premises.	Low risk
<b>Password control:</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures:</b>	THERE ARE NO other security measures.	Low risk

MARKETING	Measures	Risk
<b>Permit:</b>	Limited to authorised staff in the workstations and document archives.	Low risk
<b>Access:</b>	Access to the Department governed by the security measures of the Premises.	Low risk
<b>Password control:</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures:</b>	THERE ARE NO other security measures.	Low risk

COMERCIAL	Measures	Risk
<b>Permit:</b>	Limited to authorised staff in the workstations and document archives.	Low risk
<b>Access:</b>	Access to the Department governed by the security measures of the Premises.	Low risk
<b>Password control:</b>	The keys are stored in a secure place which requires authorised access.	Low risk
<b>Other security measures:</b>	THERE ARE NO other security measures.	Low risk

### Confidentiality of information

Information on the processing for the data subject	Measures	Risk
<b>Is the Data Subject informed of the details of the processing?</b>	Yes, with personalised data protection clauses.	Low risk
<b>Has the Data Subject been informed of their rights?</b>	Yes, with personalised data protection clauses.	Low risk
Transport and transfer of data	Measures	Risk
<b>Transfer of storage media within the company</b>	By staff authorised by the Data Controller with security measures.	Low risk
<b>Transfer of storage media beyond the company</b>	By staff authorised by the Data Controller with security measures.	Low risk
Automated data procedures (digital)	Measures	Risk
<b>Access during digital processing (screens)</b>	The data is processed by preventing unauthorised persons from viewing the data.	Low risk
<b>Storage of the digital storage media</b>	It is stored in a Cabinet and/or Department with security measures.	Low risk
<b>Destruction of the digital storage media</b>	Digital storage media destroyer.	Low risk
Non-automated data procedures (documents)	Measures	Risk
<b>Access during manual processing (documents)</b>	It is processed preventing unauthorised persons from accessing the data.	Low risk
<b>Document storage</b>	It is stored in a Cabinet and/or Department with security measures.	Low risk
<b>Document shredding</b>	Paper shredder.	Low risk
Register of access to special categories of data	Measures	Risk
<b>Is a record taken of logins to special data categories?</b>	Special categories of data ARE NOT PROCESSED.	No risk

### 09 Network

Access to IT equipment	Measures	Risk
<b>Control of access to IT devices</b>	Personalised username and password.	Low risk
<b>Control of access to personal data records</b>	Access to the records and/or program through a password.	Low risk
Access to IT networks	Measures	Risk
<b>Direct access to information systems (network connection)</b>	Personalised username and password.	Low risk
<b>Wireless access to IT systems (Wi-Fi, Bluetooth, etc.)</b>	Restricted access by security code.	Low risk
<b>Remote access to information systems</b>	Personalised username and password.	Low risk

<b>Encryption of remote connections</b>	Yes.	Low risk
Identification and authentication system	Measures	Risk
<b>Identification system (USERNAME)</b>	Personalised password for each user.	Low risk
<b>Authentication system (PASSWORD)</b>	Personalised password for each user.	Low risk
<b>Encryption of the password</b>	The password is encrypted	Low risk
<b>Combination of characters</b>	The password consists of at least 8 characters, with at least one number, one upper case letter, one lower case letter and a symbol or a special character	Low risk
<b>Repeated attempts to login</b>	The system has been implemented to prevent repeated unauthorised attempts	Low risk
<b>Expiry of the password</b>	The password is changed at least once a year	Low risk

### Information integrity

Backup copies	Measures	Risk
<b>Location of the copies</b>	It is stored in Hardware other than that which created it (network copy).	Low risk
<b>Frequency of scheduling</b>	At least weekly.	Low risk
<b>Data verification frequency</b>	At most 6 months after creation.	Low risk
<b>Data verification method</b>	Copy verification software.	Low risk
External backup copies	Measures	Risk
<b>Location of external copies</b>	Premises or department other than where it was created.	Low risk
<b>Frequency of scheduling external copies</b>	At least weekly.	Low risk
<b>Encryption of the data of the external copies</b>	Copies are not encrypted because they do not leave the company's premises.	No risk
Availability of the data	Measures	Risk
<b>Availability of the information services</b>	THERE ARE measures to guarantee the availability of the data	Low risk
<b>Restoration of the information services</b>	THERE ARE measures to rapidly restore availability and access to the data	Low risk
<b>Resilience of the information services</b>	THERE ARE measures to anticipate and adapt to unforeseen changes in the information services	Low risk
<b>Security measure verification and assessment processes</b>	PROCESSES HAVE BEEN ESTABLISHED to verify or assess the effectiveness of the security measures	Low risk

### Specific treatments

Specific processing	Measures	Risk
<b>Processing of data of children younger than 14 years old</b>	The data of children younger than 14 years old IS NOT PROCESSED	No risk
<b>Infringement of fundamental rights and freedoms</b>	NO processing infringing fundamental rights or freedoms IS PERFORMED	No risk

### Internet

Electronic communications	Measures	Risk
<b>Secure email</b>	Secure email using point-to-point encryption IS USED.	Low risk
<b>Data protection clause</b>	A data protection clause with adequate data processing information HAS BEEN PUBLISHED.	Low risk

### Organización

Organisation	Measures	Risk
<b>Information Policy</b>	THERE IS a documented protocol for informing and communicating the processing to the data subject	Low risk
<b>Rights of the Data Subject</b>	THERE IS a documented protocol for managing and recording the rights of the data subject	Low risk
<b>Security Policy</b>	THERE IS a documented protocol guaranteeing the security of the personal data and its protection from DESIGN AND DEFAULT	Low risk
<b>Security breaches</b>	THERE IS a documented protocol for managing and recording security breaches	Low risk
<b>Data protection training</b>	[Adequate training is provided to staff authorised to process data] through the publication of the security policy	Low risk
<b>Data Protection Officer (DPO)</b>	[A DPO is not required because the company's core business] CONSISTS in processing personal data but NOT on a LARGE SCALE, nor regulated in art. 34 of the LOPDGDD.	Low risk
<b>Impact assessment (DPIA)</b>	[It is not necessary to carry out a DPIA because] the processing is not likely to result in a high risk for the rights and freedoms of natural persons.	Low risk