

## NORMATIVE COMPLIANCE REPORT

### 1. Objective and applicable regulation

The report has been carried out in accordance with the provisions of Regulation (EU) 2016/679 of 27 April 2016 (General Data Protection Regulation - GDPR) which establishes the rules on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

The purpose of the report is to analyse regulations that affect the processing of personal data through applying it to each file in order to demonstrate compliance, informing of:

- The measures implemented within the organisation for personal data
- protection. The deficiencies encountered and corrective measures to be implemented.

### 2. Identification of the Controller within the organisation

In accordance with the provisions of Article 4.7 of the GDPR, the Controller is the natural or legal person, public body, service or other body which, acting alone or in concert with others, determines the purposes and means of the processing.

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### 3. General concepts of data protection

#### - Definitions:

- **Personal data:** any information relating to a natural person through which their identity may be determined.
- **Data Subject:** natural person subject to the processing of their personal data.
- **Processing:** any operation performed concerning personal data: collection, access, editing, transfer, storage and erasure.
- **Filing system:** structured set of personal data subject to processing for a certain purpose.
- **Controller:** organisation which determines the purposes and methods of the processing.
- **Processor:** organisation which carries out data processing on behalf of the Controller.
- **Recipient:** organisation receiving personal data by means of communications or transfers from the Controller or Processor.

#### - Categories of data:

• **Basic data:** Personal data which does not correspond to special categories of data; neither convictions nor criminal offences, e.g. name, address, email, telephone number, age, sex, signature, image, interests, assets, banking, academic, professional, social, commercial, or financial information, etc.

• **Special categories of data:** Data relating to ethnic or racial origin, political opinions, religious or philosophical convictions, trade union membership; genetic or biometric data enabling a person to be unequivocally identified; data relating to health or life and sexual orientation.

• **Criminal convictions and offences:** Data relating to criminal convictions and offences or related security measures.

#### - Processing categories:

- **High risk:** Processing liable to carry a high risk for the protection of data and for the freedoms of the Data Subject.
- **International transfers:** Transfer of data to businesses not established within the EU.
- **Profiling:** Preparation of individual decisions aiming to assess, analyse or predict personal aspects.
- **Group of companies:** A group comprising a business which exercises control and the controlled businesses themselves.
- **Data on ownership or public interest:** Processing carried out by public authorities or bodies based on currently applicable legislation and acting in the public interest.

#### - Processing system:

- **Digital:** Automated processing (electronic)
- **Manual:** Non-automated processing (on paper)
- **Mixed:** Partially-automated processing (both digital and manual)

#### 4. Identification of personal data files

Filing system	Description	Type	System	Category
GESTIÓN DE CAMPAÑAS DE CROWDFUNDING	Soporte, configuración y mantenimiento de la plataforma. Gestión de los fans y donantes de las campañas creadas por los promotores.	Processor	Mixed	BASIC

#### 5. Data protection audit

Data protection should be considered for all operations carried out on personal data: collection, registering, organising, structuring, storing, adaptation or amendment, extraction, consultation, use, communication by transmission, circulation, or by any other means of access clearance, collation or networking, data limitation, erasure or destruction.

The data protection audit determines regulatory compliance dealing with the technical and organisation design of the Controller and applying specific provisions in accordance with the data categories which are being completed.

Regulations are structured into the following data protection protocols:

#### - Processing principles:

- Legitimacy of the processing (lawfulness)
- Purpose of the processing (purpose limitation)
- Limitation of the processing (data minimisation)
- Up-to-date data (accuracy)
- Data storage (storage limitation)
- Data protection (integrity and confidentiality)

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**- Processing responsibility:**

- Authorised personnel
- Processors
- Subcontracting the processing
- Joint Controllers
- Recipients

**- Information policy:**

- Transparency of information
- Basic processing information
- Specific information on international transfers (if applicable)
- Specific information on profiling (if applicable)
- Communication of the information to the Data Subject
- Communication of data to third parties

**- Security policy:**

- Rights of the data subjects
- By design and by default
- Processing risks
- Impact assessment (if applicable)
- Security breaches

**Specific security measures:**

- Access to documents
- Access to computers and computer networks
- Access to special categories of data (if applicable)
- Password security
- Protection of computers and computer networks
- Backup copies
- Transport and transfer of data
- Data storage
- Safeguarding of special categories of data (if applicable)
- Destruction of data
- International transfers

Filing system	Description	Type	System Category	
MANAGEMENT OF CROWDFUNDING CAMPAIGNS	Support, setting up and maintenance of the platform. Management of fans and donors of the campaigns created by promoters.	Processor	Mixed	BASIC
<b>Regulations</b>	<b>Processing</b>			
<b>Processing principles</b>				
Legitimacy of the processing (lawfulness)	Lawfulness obtained through formalisation of a Data Manager Contract			
Purpose of the processing (purpose limitation)	INFORMATION TECHNOLOGY Services			
Limitation of the processing (data minimisation)	To obtain the minimum ADEQUATE, RELEVANT AND LIMITED data in order to achieve the purpose			
Data update (accuracy)	THERE ARE PROCEDURES for data update			
Data storage (storage limitation)	Stored IN ACCORDANCE WITH the instructions of the Controller			
Data protection (integrity and confidentiality)	There are ADEQUATE MEASURES to protect data against unauthorised processing, loss or destruction			
<b>Processing Responsibility</b>				
Authorised personnel	The data are processed by PERSONNEL of the organisation IN ACCORDANCE WITH THE INSTRUCTIONS of the Controller			
Subcontracting the processing (SubPP)	Data processing is SUBCONTRACTED, WITH PRIOR AUTHORISATION of the Controller			
Data recipients	Data is NOT COMMUNICATED to third parties, except under legal obligation			
<b>Security Policy</b>				
Rights of the data subjects	Data is organised in such a way that it is POSSIBLE to facilitate the exercise of the rights of the Data Subject			
By design and by default	Appropriate default design data protection measures HAVE BEEN IMPLEMENTED			
Processing risks	The INSTRUCTIONS received by the Data Processor to carry out processing INDICATE the level of security to apply in order to protect the rights and freedoms of persons concerned			
Security breaches	THERE EXISTS a protocol in the event of a security breach			