

## **PRIVACY POLICY**

### **INFORMATION FOR USERS**

INTERNATIONAL STUDIES S.A, as the data controller, informs you that, as contained in Regulation (EU) 2016/679 dated April 27th 2016 (GDPR) and in Spanish Organic Law 3/2018, dated December 5th 2018, on protection of personal data and digital rights (LOPDGDD), we will process your data as we describe in this Privacy Policy.

In this Privacy Policy we describe how we collect your personal data and why we collect it, what we do with it, who we share it with, how we protect it, and your choices regarding the treatment of your personal data.

This Policy applies to the processing of your personal data collected by the University. If you agree to the measures contained in this Policy, you consent to our processing your personal data as defined in this Policy.

### **CONTACT**

The controller for your data is:

- Corporate name: INTERNATIONAL STUDIES S.A
- Trade Name: CIS UNIVERSITY
- TAX ID No. (CIF): A78055415
- Address: C/ VELAZQUEZ N° 140 MADRID (SPAIN)
- Tel: +34 91 563 67 40
- Email: [privacy@cis-spain.com](mailto:privacy@cis-spain.com)

### **DATA PROTECTION OFFICER**

The Data Protection Officer (DPO) is the company's person responsible for data and data protection consultant.

The DPO must ensure compliance with regulations and act as an intermediary between interested parties (company, authorities, etc.).

Contact: [privacy@cis-spain.com](mailto:privacy@cis-spain.com)

## PRINCIPLES

- **Lawfulness:** We will only collect your personal data for specific, explicit, legitimate purposes.
- **Data minimization:** We limit the personal data we collect to what is strictly relevant and necessary for the purposes for which it was collected.
- **Limitation of purpose:** We only collect your personal data for our stated purposes.
- **Accuracy:** We will keep your personal data accurate and updated.
- **Data security:** We implement suitable technical and organizational measures commensurate with the risks to ensure that your data is not damaged.
- **Access and rectification:** We have the means so that you can access and correct your data when you want.
- **Storage:** We hold your personal data legally and appropriately, and only while it is needed for the purposes for which it was collected.
- **International data transfers:** In the event your data is to be transferred outside the EU/EEA, it will be properly protected. Access and transfer of personal data to third parties are undertaken in accordance with applicable laws and regulations, while ensuring appropriate contractual safeguards.
- **Direct marketing and cookies:** We comply with the pertinent legislation on advertising and cookies.

## WHAT INFORMATION DO WE COLLECT?

The types of data we may request and process are:

- Identifying data, data on personal and family characteristics, social and academic circumstances.

- Financial and economic data.
- We also automatically collect data on your visit to our website as described in the cookie policy.

Whenever we ask for your personal data, we clearly tell you which personal data we collect for the purpose of answering your queries and requests, using forms that we post on our website or other means.

Each party is responsible for ensuring that the data provided is true, accurate, complete and updated. They alone will be responsible for any direct or indirect damage or harm that may occur as a result of breaching such an obligation.

In the event that the data a user provides belongs to a third party other than the one providing the data, the user must inform the third party of the aspects contained in this Privacy Policy and obtain their authorization to provide their data to INTERNATIONAL STUDIES S.A. (CIS).

## **WHY AND FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?**

Your personal data is collected exclusively for the purposes described in this Privacy Policy, based on the following conditions:

- **Execution of the contractual relationship with the University, or to apply pre-contractual measures.**
- **Legitimate interest:** To undertake commercial and/or advertising actions or communications, on any media, including electronic or similar communications, related to the university's services, in accordance with Spanish Law 34/2002 (LSSI).

You may object to this processing based on legitimate interest, following the instructions contained in the section Interested Parties' Rights in this Privacy Policy.

- **Consent:**
  - To send information and advertising on the educational center's own services or related services, on any media, including electronic or similar communications.
  - To send information and advertising on products and services provided by other third party companies related to the educational center, on any media, including electronic or similar communications, as well as receive information from the NGO Cruzada por los Niños, Fundación International Studies, International Studies Foundation USA and Fundación RFK Human Rights Spain, non-profit entities belonging to the same educational group as CIS University.

### **HOW DO WE OBTAIN YOUR PERSONAL DATA?**

Through the information you provide us when you fill out any of the forms provided on our website or other physical or digital media, or by contracting our products and/or services.

### **WITH WHOM DO WE SHARE YOUR DATA?**

Your data may be sent to third parties so as to provide various services, operating as data processors, but we will not disclose your personal data to third parties unless we are required by law, or you have agreed to this with the University after being properly informed.

We share your information with:

- Service providers hired by (data processors): Our hosting service, IT technicians or consultants. We demand that our service providers only use the personal data provided for the purpose described in the corresponding contract, and that once this purpose is fulfilled, they destroy such data.
- Service providers located outside the European Economic Area (international data transfers): In such cases, the affected parties' express consent is required, and these providers are subject to current legislation regulating institutions that receive information.

- Due to legal obligation: Spanish Tax Office, pertinent government authorities, judges and courts, or similar, and so on.

## DATA RETENTION

The personal data will be retained for as long as the contractual relationship between the parties exists and, in any case, until the period to claim liabilities arising from the contractual relationship and other legal obligations has elapsed.

In all other cases, the personal data provided will be held as long as the interested party does not request deletion, taking as reference the deletion request date.

Data will also be kept in accordance with the legal, tax and accounting periods established by law.

## RIGHTS OF INTERESTED PARTIES

- To request confirmation regarding whether we are processing your personal data and, if so, access such data or request **portability**.
- **Challenge** the processing of your data and/or request **deletion** of such data.
- **Limit** processing of your data.
- Revoke the **consent** given at any time. Notwithstanding, bear in mind that after honoring your revocation, we may continue to communicate with you as needed to comply with our legal obligations or to enforce your contract with us.

For the proper practice of your rights, when making your request, you must provide proof of your identity by means of a copy of your ID card (DNI), or equivalent official document, along with identification of the company (or companies) to which your data is linked. Communication channels available:

- Postal mail: INTERNATIONAL STUDIES S.A , Calle Velázquez N° 140 Madrid (Spain) writing “Data Protection” in the Subject line
- Email: [privacy@cis-spain.com](mailto:privacy@cis-spain.com), writing “Data Protection” in the Subject line

If you believe that your personal data have not been processed in accordance with the regulations, you can contact the Data Protection Officer at [privacy@cis-spain.com](mailto:privacy@cis-spain.com), writing in the Subject line: Data Protection Claim

### **UPDATE OF THE PRIVACY POLICY**

As part of our continuous improvement process and to ensure greater efficiency in protecting interested parties’ rights, we periodically update our Privacy Policy.