

PRIVACY POLICY

FUNDACIÓ PRIVADA INFORM – INSTITUTO PARA LA FORMACIÓN DE JÓVENES EN LA ADMINISTRACIÓN DE EMPRESAS (hereinafter “**INFORM**”) is the owner of the Website <https://inform.es/en/> and <https://empresaula.com> (hereinafter “**Website**”), the virtual area <https://auth.nectios.com/fundacio-inform> (hereinafter “**Practice Enterprise Area**”), and the program <https://simulaempresa.com> (hereinafter the “**Program**”). INFORM is the data controller of the personal data of users of these platforms (hereinafter the “**Users**”). These three services will jointly be referred to as the **INFORM Platform**.

Through this Privacy Policy, and in accordance with Articles 12 and 13 of Regulation (EU) 2016/679 (**GDPR**) and Article 11 of Spanish Organic Law 3/2018 of December 5, on the Protection of Personal Data and Guarantee of Digital Rights (**LOPDGDD**), INFORM informs Users of the INFORM Platform about the processing of their personal data collected through these services.

1. DATA CONTROLLER INFORMATION

- **Data Controller:** FUNDACIÓ PRIVADA INFORM – INSTITUTE FOR THE TRAINING OF YOUNG PEOPLE IN BUSINESS ADMINISTRATION
- **Tax ID:** G-61468583
- **Registered Address:** Carrer del Pi, número 24, 08810 Sant Pere de Ribes, Barcelona
- **Contact:** privacy@inform.es

2. DATA PROCESSED, LEGAL BASIS, PURPOSES AND RETENTION PERIOD

DATA PROCESSED	LEGAL BASIS	PURPOSE	RETENTION PERIOD
Browsing data. Due to internet communication standards, when you use the INFORM Platform we automatically receive the URL of the site you came from and the site you visit when you	Consent of the data subject. Legitimate interest	Analysis of browsing behavior and statistics: The information collected through cookies and similar tracking technologies allows for an analysis of the Users' browsing activity. Ensure proper	The retention periods depend on each specific *cookie. For more information about the retention periods for each type of cookie and/or other tracking technologies used,

leave our INFORM Platform. We also receive your computer's Internet Protocol ("IP") address and the type of browser you are using.		technical functioning of the INFORM Platform.	see our cookie policy.
Client contact person data (Name, surname, email, phone, necessary information to subscribe to services on behalf of the client).	Performance of a contract in which the User is a party.	Subscribe to services between INFORM and its clients.	The client contact person's data will be processed during the validity of the services between the client and INFORM and, once these end, will be blocked for compliance with INFORM's legal obligations.
Contact and identification data (Name, surname, email, phone, requested information).	Consent of the data subject.	Respond to requests made by Users through the INFORM Platform.	The personal data provided will be processed for the time necessary to respond to the Users' inquiries and, once completed, will be blocked until compliance with legal obligations.
Registration data (Name, surname, email, educational center code, city).	Performance of a contract in which the User is a party.	Create an account in the Practice Enterprise Area and the Program so the User can access the Practice Enterprise Area and the Program and its contents.	Program, we will process the personal data necessary for registration during the provision of services by INFORM in the educational centers

			the User belongs to and, once services end, the data will be blocked for the time required to comply with INFORM's legal obligations.
SEFED Area data (Name, surname, email, data provided through the SEFED Area).	Performance of a contract in which the User is a party.	Provide a virtual space with services to work with the practice enterprise and carry out collaborative work with the rest of the practice enterprise network.	The User's data will be processed during the validity of the services between the User and INFORM and, once ended, will be blocked for compliance with INFORM's legal obligations.
Program data (Name, surname, username, email, and data provided through the Program).	*Performance of a Contract in which the User is a party.	Provide a virtual space with services to work with the practice enterprise and carry out collaborative work with the rest of the practice enterprise network.	The Users data will be processed during the validity of the services between the User and INFORM and, once ended, will be blocked for compliance with INFORM legal obligations.
Commercial communications. Name, surname,	Consent of the Website User. Legitimate	Receive commercial information about	The data will be processed by INFORM until the

email of the User.	interest for persons who have signed a contract with INFORM.	INFORM and its services.	<p>Users withdraws consent, by sending a notice to privacy@inform.es or clicking the unsubscribe link in our email communications.</p> <p>Once consent is withdrawn, INFORM will block the data for the time necessary to comply with legal obligations.</p>
Image of the Users.	Consent of the User.	Use recordings of activities carried out by Users through the INFORM Platform.	<p>The User's data will be retained as long as consent for this processing is maintained. The User may withdraw consent at any time. If applicable, INFORM will block the data</p>

			to comply with legal obligations and, once such obligations expire, the data will be permanently deleted.
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3. DATA SHARING

INFORM, informs that, for the fulfillment of the purposes described above, it will not transfer the User's personal data to third parties. However, INFORM may give access to this personal data to companies providing technological services with which it has signed a contract as a data processor; in particular to:

- Companies providing database maintenance services and managing Newsletter subscriptions.
- Companies providing analytics services.
- Companies providing hosting services.
- Companies providing email services.

Likewise, INFORM may communicate your data to:

- Companies providing legal and accounting services to INFORM.
- Authorities to investigate suspicions of fraud, harassment or other violations of any law, rule or regulation, or the policies of the INFORM Platform.
- The rest of the Users of the INFORM Platform for the fulfillment of the purposes of promoting networking, sharing knowledge, experiences, good practices, generating debates and preparing documents, as well as highlighting the work being carried out in the INFORM community.

The data that will be shared will only be the name, surname, image and the contents of the comments entered by the Users on the INFORM Platform.

The aforementioned provider companies may be located in jurisdictions that generally do not offer adequate guarantees in relation to the processing of personal data. For all entities that are not part of the European Economic Area (EEA), INFORM has signed contracts with these entities that include the corresponding safeguards, including the European Commission's model clauses.

Users can obtain more information about the companies providing technological services by requesting it from INFORM through the contact methods provided in this privacy policy.

4. PROCESSING OF THE IMAGE AND VOICE OF USERS

During the use of the Platform, Users may share their image and voice with INFORM and other Users provided that the User has given their express consent as described in this section.

Some activities of the Platform may consist of recording the image and/or voice of the User. These activities will be carried out in order to obtain a greater training experience that allows the User to expand the knowledge acquired on the Platform.

In all cases in which the processing of the image and/or voice of the User is required, INFORM will provide the tools used for this purpose with the camera and microphone deactivated by default. In such a way that, at the moment in which the User activates the microphone and camera, it will be considered as a positive action of express consent for the processing of their voice and image in relation to the purposes described in this section. In this way, this data of the Users will not be processed unless the User has expressly indicated so.

5. SECURITY AND CONFIDENTIALITY

INFORM undertakes to adopt the necessary physical, technical and organizational measures, in accordance with the provisions of the applicable regulations, to guarantee the security of personal data and to avoid the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or the unauthorized communication or access to such data. The personal data will be treated confidentially by INFORM, which undertakes to inform and ensure that this confidentiality is respected, by legal or contractual obligation, by its employees, partners and any person who must have access to the User's personal data.

6. USER RIGHTS

The User may exercise the rights of access, rectification, deletion, opposition and, where appropriate, limitation of the processing and portability of the data by sending an email to privacy@inform.es

Likewise, the User may file a complaint with a control authority and, in particular, with the Spanish Data Protection Agency (www.aepd.es) if they consider that the rights set out above in this Privacy Policy have been violated or if they consider that the processing of personal data concerning them violates the applicable regulations.

7. CHANGES TO THE PRIVACY POLICY

INFORM reserves the right to modify this Privacy Policy at any time. Changes or updates to the Privacy Policy will be explicitly notified to the User by means of a notice on the INFORM Platform, together with the updated version of the Privacy Policy.

Latest version: May 2025