

LEGAL NOTICE

Description:

The **Legal Notice** includes the **minimum information required** for the **user** accessing the site to **learn about the company owner of the site**, which means the entity behind the website.

This clause provided in a table must be included in the website for those companies **providing, advertising or offering a certain product or service**. Only blogs or websites that do not perform any type of business activity are excluded from said obligation.

This clause must be **accessible from all of the website's tabs**.

In addition to providing basic identification information of the company, **several clauses** not strictly related to data protection or regulations for e-commerce and information society services may be added, in relation to, for example, intellectual property, industrial property, etc.

Legal Notice

WEBSITE OWNER INFORMATION

CORPORATE NAME: VERSIÓN DIGITAL S.L.

CIF: B98660459

REGISTERED OFFICE: RDA. GUGLIELMO DE MARCONI, 4 PARQUE TECNOLOGICO, 46980, PATERNA, VALENCIA

CONTACT:

Telephone: 963311423

E-mail:

[administracion@versiondigital.e](mailto:administracion@versiondigital.es)

[s](#)

REGISTRATION DATA
OF COMPANIES REGISTRY:

Tome:9841

Book:7123

Folio:13

Sect.:de sociedades

Page:V-161127

CODE OF CONDUCT:

PRIVACY POLICY

Description:

The Privacy Policy is a legal text that must be included in **websites that collect personal data** by means of different systems, such as a contact form, application form, form with banking details to make an online purchase, a newsletter, etc. **Said text provides detailed information**, as is the case of the informative clause, on the **forms applied by the organization website owner to manage** client, suppliers or employee information, or its purpose, application, etc.

Privacy Policy (1st Layer). The first layer includes **basic information**. Said information, provided in a table, must be **initially provided when entering personal data** on the website (see example). It is important to enable tools preventing users from submitting personal data without marking the box reading “I have read and accept the Privacy Policy”. Under no circumstance may the box be selected by default.

Full Privacy Policy (2nd Layer). The second layer includes detailed information. It fully extends on its purpose, use, term of maintenance of data, etc. Said information **must be accessed** as follows:

- Clicking on the link in the 1st layer enabled to such effects.
- From a general tab available in the main website, as well as other subpages, similar to the Legal Notice.

1st Layer of Privacy Policy

BASIC INFORMATION REGARDING OUR PRIVACY POLICY	
CONTROLLER	VERSIÓN DIGITAL S.L.
MAIN PURPOSE	Subscription management / Application management / Management of sending of information and commercial research.
LEGITIMACY	Authorization of data subject.
RECIPIENTS	No data shall be disclosed to third parties, unless expressly authorized or due to legal obligations.
DATA SUBJECT RIGHTS	Access, rectification, and removal of data, portability of data, limitation or opposition of its processing, right to object to being subject to automated decisions.
ADDITIONAL INFORMATION	Additional and detailed information is available in our Privacy Policy in HTTP://WWW2.VERSIONDIGITAL.ES (LINK LEADING TO THE FULL PRIVACY POLICY, 2 nd LAYER)

Example:

CONTACT

Name	<input type="text"/>
E-mail	<input type="text"/>
Message	<input type="text"/>

It is important to read the following basic information on our Privacy Policy before sending the request:

BASIC INFORMATION REGARDING OUR PRIVACY POLICY	
CONTROLLER	VERSIÓN DIGITAL S.L.
MAIN PURPOSE	Subscription management / Application management / Management of sending of information and commercial research.
LEGITIMACY	Authorization of data subject.
RECIPIENTS	No data shall be disclosed to third parties, unless expressly authorized or due to legal obligations.
DATA SUBJECT RIGHTS	Access, rectification, and removal of data, portability of data, limitation or opposition of its processing, right to object to being subject to automated decisions.
ADDITIONAL INFORMATION	Additional and detailed information is available in our Privacy Policy in HTTP://WWW2.VERSIONDIGITAL.ES/ (LINK LEADING TO THE FULL PRIVACY POLICY, 2 nd LAYER)

- I have read and agree to the Privacy Policy.
- I give my authorization to receive electronic communications regarding activities, products or service by mail, fax, e-mail or any other equal electronic means.

Privacy Policy (2nd Layer)

PRIVACY POLICY

In line with the principles of legality, fairness and transparency, the Privacy Policy is provided below.

Controller

VERSIÓN DIGITAL S.L.

CIF: B98660459

REGISTERED OFFICE: RDA. GUGLIELMO DE MARCONI, 4 PARQUE TECNOLOGICO, 46980, PATERNA, VALENCIA

E-mail: administracion@versiondigital.es

Telephone: 963311423

The Purpose of Processing of Data

VERSIÓN DIGITAL S.L. strives to process the provided data in order to manage the corresponding contractual relationship, manage the submission of the requested information, provide offers for our services and/or products that may be of interest and/or manage their application.

Period of Time Personal Data Shall be Stored

Data shall be preserved over the minimum period of time to supply the service appropriately, as well as to answer any possible liabilities and other legal requirements.

Legitimacy in Data Processing

The legal basis behind data processing may be in execution of a potential and/or signed contractual relationship, legitimate interest, legal power and/or the authorization given by the data subject. The data requested is appropriate, pertinent and strictly necessary, and, in no circumstance, is the data subject obliged to provide such data, but, lack of such communication may affect the objective of the service or imply the inability of its execution.

Recipients of Data

VERSIÓN DIGITAL S.L. shall refrain from disclosing data to a third party, unless expressly notified.

Applicable Rights When Providing Data

The data protection rights applicable to the interested parties are as follows:

- The right to request to access personal data.

- The right of rectification or erasure.
- The right to object.
- The right to restriction of processing.
- The right of data portability.

Holders of the personal data provided may exercise the rights on personal data protection by sending a written notification to VERSIÓN DIGITAL S.L.'s registered address or to the e-mail to such effects administracion@versiondigital.es, attaching, in either case, a photocopy of your DNI (Spanish identification document) or other similar identification documents.

Models, application forms and other information regarding rights is available in the website www.agpd.es of the Control Authority, the Spanish Data Protection Agency, hereinafter, AEPD for its abbreviation in Spanish.

Withdrawal of Consent

You will have the possibility and right to withdraw authorization for any specific purpose granted at any given time without prejudice of the legality of processing according to the consent given before withdrawal.

Where Claims are Presented When There is Reason to Believe Data is not Being Correctly Processed

If a party considers that VERSIÓN DIGITAL S.L. is not correctly processing, any claims can be sent to administracion@versiondigital.es or to the corresponding data protection authority, this being AEPD in Spain, www.agpd.es

Security and Update of Personal Data

In aims to preserve the security of your personal data, VERSIÓN DIGITAL S.L. has implemented all the technical and organization related measures to guarantee safety for the provided data. This is done to prevent its alteration, loss, and/or unauthorized processing or access, as required by regulation, in the case of lack of total security.

In order to keep the data updated, it is essential for you to notify of any modifications.

Confidentiality

All staff members of VERSIÓN DIGITAL S.L. participating in any of the processing stages shall process and handle your data under strict care and confidentiality. Your data shall not be disclosed or communicated to a third party, unless required by legal provisions or the data subject has authorized otherwise.

Description:

The **Cookies Notice and Policy** must be made available to those visiting the website when the applied cookies are not exempt from said obligation (technical cookies).

Information regarding cookies:

- **Cookies Notice (1st layer or cookies banner)**. The first layer includes **basic information** regarding cookies. Such notice must include the following: (i) a warning regarding the use of their own cookies, third party cookies, or both, (ii) the purpose of cookies, (iii) warnings that, when a certain action is executed, the user is considered to have given authorization, and (iv) a link to the full Cookies Policy (2nd layer).

The Cookies Notice shall be made **available** in the **home page**, thus, easily spotted and visible when the user opens the website, whether on the top of the site or any other part.

- **Cookies Policy (2nd layer)**. The second layer includes detailed information about cookies. Such text must provide further detail on the following: (i) the definition and role of cookies, (ii) information provided in a table or list regarding the types of cookies used by the site and their purpose, as well as identifying those belonging to the same organization and those of a third party, and (iii) information on how cookies are deactivated or cancelled.

The Cookies Policy must be **accessible** by:

- Clicking on the link in the Cookies Notice (1st layer or cookies banner).
- From a general tab available in all of the website's tabs, as is the case of the Legal Notice and the Privacy Policy.

NOTE: Assistance of an **IT Specialist** is required to **identify the types of cookies** the website applies.

Cookies Notice (1st Layer or Cookies Banner)

This website applies owned and third party cookies (if applicable) to assess your browsing and in order to provide customized services (if applicable) and publicity according to your interests. Continuing browsing will be considered as your acceptance of our [Cookies Policy](#) (link to 2nd layer).

Cookies Policy (2nd Layer)

1. Definition of Cookies

The website for **VERSIÓN DIGITAL S.L.** (hereinafter, the Website) uses cookies. Cookies are files sent to a browser by means of web server to record users' activity in a specific site. The first objective of cookies is to provide faster access to the desired services to users. Moreover, cookies customize the services provided by the Website, providing and offering information of the user's interest or that may be of interest, according to the use made of the services.

The Website uses cookies to customize and make the user's browsing as easy as possible. Cookies are solely associated to an anonymous user and their corresponding computer, and they do not provide references that may give way to guessing the user's personal data. A user may set their browser to send notifications and to prevent the installation of cookies sent by the Website, without affecting the user's access to the site's content. Nonetheless, it is worth mentioning that the operation quality of the Website might decrease.

Users that are already registered, in process of registry or opening a session shall be able to benefit from customized services, focused on their profile, thanks to the combination of stored data of the cookies and cookies with the personal data collected upon registration. Such users expressly authorize the use of said information for the aforementioned purpose, notwithstanding their right to decline or deactivate the use of cookies.

Moreover, the Website shall be able to know the services requested by the user, in aims to provide or offer the adequate information in line with the user's likings or preferences.

2. Types of Cookies

Cookies can be divided, according to their **Permanence**, as follows:

- **“Session Cookies”**: These expire as soon as the user closes the browser.
- **“Persistent Cookies”**: These expire according the achieved purpose (for example, to keep the user identified while using Services) or when they are manually eliminated.

Additionally, Cookies can be classified, according to their **Objective**, as follows:

- **Performance Cookies:** These cookies remember preferences for the tools available in the services, thus not having to re-set the services the user accesses. This includes, for example:
 - Volume adjustments in video or audio players.
 - Video transmission speeds compatible with the browser.
- **Geolocation Cookies:** These cookies are used to identify the country the user is in when requesting a service. Such Cookies are completely anonymous and are only used as a guide the location of content.
- **Registration Cookies:** These cookies are created after the user has registered or subsequently opened a session, and are used to identify the user in the services, in aims to:
 - Keep the user identified, as to, when the service is closed, the browser or computer may maintain their identity if they wish to Access the service at another time or day, avoiding having to provide identification again. This feature can be eliminated by clicking on “end session”, therefore eliminating the cookies, making the user have to identify themselves to access the same service.
 - Verify if the user is authorized to access certain services, such as participation in a contest.
- **Analysis Cookies:** When a user visits a service, a tool provided by an external supplier creates an analysis cookie in the user’s computer. This cookie is only created in the user’s visit and shall be applied in following visits to the Website’s services to anonymously identify the visiting user. The main objectives are as follows:
 - Allow anonymous identification of visiting users by means of the Cookie (identifies browsers and devices, not individuals), thus providing an approximate number of visits and their average trends of duration.
 - Identify, anonymously, the most visited content and, thus, more attractive to users.
 - Learn if the accessing user is visiting for the first time or has visited before.
 - Note: unless the user registers for a website service, a Cookie is never linked to identifying personal data. these Cookies are solely used for statistical purposes to be of assistance in the enhancement of the user’s experience on the site.
- **Behavioral Advertising Cookies:** These types of cookies allow extended information of the advertisements shown to each anonymous user in the Website’s services. Among other examples, it stores viewing duration and frequency of advertisements, their interaction with said advertisements, or browsing and/or behavioral patterns of the user that can help to create a

profile of advertising interest. This allows the advertisements displayed to be in line with the user's interests.

- **Third Party Advertising Cookies:** In addition to the publicity managed by the Website in its services, the Website offers advertisers the possibility to insert publicity through third parties ("AdServers"). This allows third parties to store cookies sent from the Website services resulting from the user's browser, as well as access data the latter has stored.
- Real Media: http://www.realmedia.com/en-us/pages/privacy_policy.html
- Weborama: <http://www.weborama.com/e-privacy/our-commitment/>

3. Cookies Applied

 The IT Specialist must identify the type of cookies used by the Website under the classification in point 2: Types of Cookies, determining if they are own cookies or third party cookies: (Remove box when the applied cookies are identified)

Cookies used in our Website:

- **Own:** Those sent to the user's terminal from a computer or domain managed by the editor, which also provides the service requested by the user.

(Standard cookies:

- Session Cookies)

- **Third party:** Those sent to the user's terminal from a computer or domain that is not managed by the editor, but by a different entity that processes collected data by means of cookies.

(Standard cookies:

- Google Analytics:

<https://support.google.com/analytics/answer/6004245?hl=es>

- ComScore:

http://www.comscore.com/esl/Sobre-comScore/Politica-de-privacidad?cs_edgescape_cc=ES

- Real Media:

http://www.realmedia.com/en-us/pages/privacy_policy.html)

4. Disabling Cookies

Usually, acceptance of cookies in the browser or cookies specific to a service can be cancelled.

The modern browsers allow modifications to the cookies settings. Said settings are usually titled “Options” or “Preferences” in the browser menu. Additionally, the browser or the e-mail Controller can be set, and accessories free of charge that prevent downloading of Website Bugs when opening an e-mail may be installed.

The Website provides users with instruction steps to access the settings menu for cookies and, in the given case, for private browsers of the main browsers:

- Internet Explorer: Tools -> Internet Options -> Privacy -> Settings.
- For more information, see Microsoft support or browser Help menu.
- Firefox: Tools -> Options -> Privacy -> History -> Custom Setup.
- Chrome: Settings -> Advanced Options -> Privacy -> Content Settings.
- Safari: Preferences -> Safety.
- For more information, see Apple support or browser Help menu.

5. Possibility of Modifications in the Cookies Policy

The Website may modify the present Cookies Policy based on legislation or regulation requirements, or in aims to adjust the policy to the guidelines provided by the Spanish Data Protection Agency. For this reason, users a recommended to re-visit such policy on a periodic basis.

When significant modifications to the Cookies Policy are made, users shall be notified through the Website or by means of an e-mail to registered users.