



Grupo
fedola

**NEW RECORD OF PROCESSING
ACTIVITIES**

GRUPO FEDOLA

GF-JURIDICO

RECORD OF PROCESSING ACTIVITIES

GRUPO FEDOLA, S.L.

The following is a translation of this policy provided for informational purposes only. In the event of any discrepancy or inconsistency, the Spanish version shall prevail and be considered the sole legally valid and binding text.

DOCUMENT CONTROL SHEET

Title	Record of processing activities. Controller
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CHANGE LOG

Version	Change	Person Responsible for the Change	Area	Date of Change
v.1.0	Creation of the document.	AIXA CORPORE S.L.	DP	30/04/2018
v.2.0	Periodic review. COVID regulations.	AIXA CORPORE S.L.	DP	17/06/2020
v.3.0	Periodic review. Personnel selection protocol.	AIXA CORPORE S.L.	DP	12/04/2022
v.4.0	Periodic review. Cookie regulations.	AIXA CORPORE S.L.	DP	14/11/2023
v.5.0	Periodic review. Whistleblowing Channel	AIXA CORPORE S.L.	DP	28/02/2025

1. PURPOSE OF THE DOCUMENT

This document sets out the personal data processing activities carried out by **GRUPO FEDOLA, S.L.** (hereinafter, **GRUPO FEDOLA, S.L.**) as **data controller**.

Details of the DATA CONTROLLER:

Name	GRUPO FEDOLA, S.L.
Address	Edificio Olympos, Candelaria, 28, 1st Floor, 38002 - Santa Cruz de Tenerife
Telephone	922151499
Email	protecciondedatos@grupofedola.com
Website	https://grupofedola.com/

The contact details of the **Data Protection Officer** are as follows:

Details of the DATA PROTECTION OFFICER:

Name:	AIXA CORPORE S.L.
Address:	Calle Fernandez Navarro 19 Local 1, 38003 - Santa Cruz de Tenerife
Telephone:	922625942
Email:	dpd@grupofedola.com

Taking into account the reviews carried out on **GRUPO FEDOLA, S.L.**, the result of applying the proposed criteria shows that the following processing activities have been identified:

- 1 CLIENTS
- 2 SUPPLIERS AND COLLABORATORS
- 3 ACCOUNTING AND TAX MANAGEMENT
- 4 HUMAN RESOURCES
- 5 PERSONNEL SELECTION
- 6 WEBSITE USERS
- 7 VIDEO SURVEILLANCE
- 8 E-COMMERCE
- 9 WHISTLEBLOWING CHANNEL

2. RECORD OF PROCESSING ACTIVITIES

CLIENT MANAGEMENT

Data controller	GRUPO FEDOLA, S.L.
Legal basis	6.1.b) Processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. 6.1.c) Processing necessary for compliance with a legal obligation applicable to the controller. Law 58/2003, of 17 December, General Taxation Law Law 10/2010, of 28 April, on the prevention of money laundering and terrorist financing Royal Legislative Decree 8/2015, of 30 October, approving the revised text of the General Social Security Law Royal Decree 1514/2007, of 16 November, approving the General Accounting Plan
Purpose	Client management Billing Administrative, accounting, and tax management Provision of the service: comprehensive advisory services for companies and individuals Sending information of interest to the client
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Clients Legal representatives Contact persons
Categories of Data	Identification data: First name and surname, ID/identification document, personal identification number, postal and email address, signature and telephone number, and digital certificate Employment details: profession, job position Commercial information: activities and businesses, trade licences Economic-financial data: bank details, assets; credit, loans, guarantees; payroll-related financial data; insurance; mortgages; income and earnings Transaction data: goods and services received
Recipients	Banking and financial institutions Notaries and registrars Insurance entities Tax Administration Data processors Public bodies required by law
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected.

Data controller	GRUPO FEDOLA, S.L.
International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the “Security Policies” document of GRUPO FEDOLA, S.L.

SUPPLIERS AND COLLABORATORS

Data controller	GRUPO FEDOLA, S.L.
Legal basis	Article 6.1.b) Processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Article 6.1.c) Processing necessary for compliance with a legal obligation applicable to the controller.
Purpose	Management of suppliers and collaborators
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Suppliers Collaborators Contact persons Legal representatives
Categories of Data	Identification data: First name and surname, ID/identification document, staff registration number, postal and email address, signature and telephone number Academic and professional data: profession, qualifications, licences, permits, authorisations, businesses Employment detail data: profession, job position Economic-financial data: bank details
Recipients	Financial institutions Tax Administration Data processor Public bodies required by law
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected.
International transfers	No international data transfers are envisaged.

Data controller	GRUPO FEDOLA, S.L.
Security measures	The security measures to be implemented are those established in the “ Security Policies ” document of GRUPO FEDOLA, S.L.

ACCOUNTING AND TAX MANAGEMENT

Data controller	GRUPO FEDOLA, S.L.
Legal basis	Article 6.1.c) Processing necessary for compliance with a legal obligation applicable to the controller.
Purpose	Accounting and tax management Economic and financial management
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Clients Staff Suppliers Collaborators Contact persons Legal representatives
Categories of Data	Identification data: First name and surname, ID/identification document, postal and email address, signature and telephone number Economic-financial data: bank details Transaction data: goods and services received and supplied by the data subject
Recipients	Financial institutions Tax Administration Data processor Public bodies required by law
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected. Financial data shall be retained under the provisions of Law 58/2003, of 17 December, General Taxation Law.
International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the “ Security Policies ” document of GRUPO FEDOLA, S.L.

HUMAN RESOURCES

Data controller	GRUPO FEDOLA, S.L.
Legal basis	Article 6.1.b) Processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Article 6.1.c) Processing necessary for compliance with a legal obligation applicable to the controller.
Purpose	Human Resources management, Personnel management (time recording, recruitment, payroll, training, absence management, trade union hours, etc.)
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Entity staff
Categories of Data	Identification data: First name and surname, ID/identification document, staff registration number, Social Security/Mutual Society number, address, address, signature and telephone number Personal characteristics data: sex, marital status, nationality, age, date and place of birth, and family data Academic and professional data: qualifications, training and professional experience Employment detail data: job position, non-financial payroll data, employee history, start and end dates, licences, permits and authorisations Attendance control data: date/time of entry and exit Economic-financial data: payroll financial data, bank details
Recipients	Occupational Risk Prevention company General Treasury of the Social Security Financial institutions Tax Administration Data processors with whom the entity has signed data processing agreements Public bodies required by law
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected.
International transfers	No international data transfers are envisaged.

Data controller	GRUPO FEDOLA, S.L.
Security measures	The security measures to be implemented are those established in the “ Security Policies ” document of GRUPO FEDOLA, S.L.

PERSONNEL SELECTION

Data controller	GRUPO FEDOLA, S.L.
Legal basis	6.1.b) Processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
Purpose	Management of the job pool and personnel selection processes
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Job applicants and participants in selection processes
Categories of Data	Identification data: First name and surname, ID/identification document, postal and email address, signature and telephone number Personal characteristics data: sex, marital status, nationality, age, date and place of birth, hobbies and lifestyle Academic and professional data: qualifications, training and professional experience Employment detail data Other CV data
Recipients	No disclosures to third parties are envisaged.
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected.
International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the “ Security Policies ” document of GRUPO FEDOLA, S.L.

WEBSITE USERS

Data controller	GRUPO FEDOLA, S.L.
Legal basis	6.1.a) the data subject has given consent to the processing of their personal data for one or more specific purposes; 6.1.b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
Purpose	Management of requests made through the website and maintenance of the relationship with website users
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Users
Categories of Data	Identification data: First name and surname; address (postal or email); telephone (landline or mobile); IP address
Recipients	They may be disclosed to public bodies required by law.
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected.
International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the " Security Policies " document of GRUPO FEDOLA, S.L.

VIDEO SURVEILLANCE

Data controller	GRUPO FEDOLA, S.L.
Legal basis	6.1.f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

Data controller	GRUPO FEDOLA, S.L.
Purpose	Management of security cameras
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Persons accessing the premises
Categories of Data	Image; Voice
Recipients	Security forces and bodies Judges and courts
Retention periods	They shall be kept for 30 days , provided that no incident occurs, in which case they shall be kept for the time necessary for the filing or reporting of the incident that occurred.
International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the "Security Policies" document of GRUPO FEDOLA, S.L.

WEBSITE USERS AND E-COMMERCE

Data controller	GRUPO FEDOLA, S.L.
Legal basis	6.1.a) the data subject has given consent to the processing of their personal data for one or more specific purposes; 6.1.b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract 6.1.f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Law 34/2002, of 11 July, on information society services and electronic commerce
Purpose	Management of requests made through the website and maintenance of the relationship with website users Management of purchases made through the website

Data controller	GRUPO FEDOLA, S.L.
	Management of collections and payments Accounting and tax management Sending commercial communications
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Website users, contact persons, legal representatives
Categories of Data	Identification data: First name and surname; address (postal or email); telephone (landline or mobile); IP address Bank and credit card details Goods and services received by the data subject
Recipients	They may be disclosed to public bodies required by law, as well as to partner entities in order to carry out purchases and/or deliveries. Financial institutions Tax Administration
Retention periods	The data shall be retained for the statutory limitation periods and for the time necessary to fulfil the purpose for which they were collected.
International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the " Security Policies " document of GRUPO FEDOLA, S.L.

WHISTLEBLOWING CHANNEL

Data controller	GRUPO FEDOLA, S.L.
Legal basis	Article 6.1.c) processing is necessary for compliance with a legal obligation applicable to the controller; Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption. Article 6.1.a) GDPR The data subject has given consent to the processing of their personal data for the specific purpose. Article 6.1.e) GDPR processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Data controller	GRUPO FEDOLA, S.L.
	Article 6.1.f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Article 9.2.g) GDPR: processing of special categories of personal data shall be carried out for reasons of substantial public interest.
Purpose	Management of case files (reports and sanctions) in the procedure referred to in Article 9 of Law 2/2023
Categories of processing	Collection, structuring, consultation, comparison, disclosure, modification, and disclosure by transmission
Categories of data subjects	Reporting persons, affected persons, and third parties whose personal data are necessary for the management of the procedure referred to in Article 9 of Law 2/2023 Contact persons Legal representatives
Categories of Data	Data of the complainant/reporting person (if the report is not anonymous) Identification data: First name and surname, ID/identification document, postal and email address, telephone number and signature Data collected in the report, including special categories of data Data of the reported person, witnesses, and other affected persons Identification data: First name and surname, ID/identification document, postal and email address, telephone number and signature Data from the report: criminal and administrative sanctions and resolution Other data: those contained in the report Data from the report and arising from the handling of the file: Report number and identification number Description of the facts that are the subject of the report Data arising from the investigation Criminal, administrative, and disciplinary infringements and sanctions
Recipients	Judicial authority, Public Prosecutor's Office, or competent administrative authority within the framework of a criminal, disciplinary, or sanctioning investigation
Retention periods	They shall be kept for the time necessary to fulfil the purpose for which they were collected and to determine any liabilities that may arise from that purpose and from the processing of the data. The provisions of archives and documentation regulations shall apply.

International transfers	No international data transfers are envisaged.
Security measures	The security measures to be implemented are those established in the "Security Policies" document of GRUPO FEDOLA, S.L.