

## PRIVACY AND COOKIES POLICY

### I. PRIVACY POLICY

For the purposes of the provisions in the current personal data protection regulations, by means of this Privacy Policy, Saba Aparcamientos, S.A. (hereinafter, “**SABA**”) hereby informs users (hereinafter, the “**User**” or “**Users**”) of the website **saba.es** (hereinafter, the “**Website**”) with regard to its policy for protecting personal data collected from Users of the Website, so that said Users may freely and voluntarily determine whether they wish to provide SABA with the personal data which may be requested of them, or which may be obtained from said Users through their access and use of the Website.

The only personal data to which SABA will have access through the Website shall be that which the User provides voluntarily; the said data will be treated in accordance with the provisions of Spanish Organic Law 15/1999, of 13 December, on Personal Data Protection (hereinafter, “**LOPD**”), and the regulations implementing same. In this regard, Users should be aware that when signing up and registering for the services offered through the Website, some personal data will be requested. In these cases, and with regard to the data, where this is stated expressly to the User, if not provided, the User will not be able to access or use the aforesaid services and content.

In compliance with the current regulations, SABA expressly declares that it has adopted all technical and organisational measures necessary to guarantee the security and integrity of the personal data it processes, and to prevent any possible loss or alteration of the same and/or access by unauthorised third parties.

#### **1) Processing of personal data provided through the Website**

Pursuant to the provisions of the data protection regulations, SABA hereby informs you of the processing of personal data provided by Users through the Website:

##### **1.1. Registration on the Website.**

The data provided by the User when registering on the Website shall be incorporated into an automated personal data file belonging to SABA.

When registering with the Website, the User provides SABA with a set of personal data which will be processed for the following purposes

- To allow access to the services and products offered on the Website.

- To manage, maintain, develop, control and promote the services and products offered on the Website.
- To contact the User to request his/her opinion or his/her participation in customer satisfaction surveys.
- To send commercial communications relating to the services and products offered by companies in the SABA Group (listed on the website [www.saba.eu](http://www.saba.eu)) which may be of interest to the User.

Unless stated otherwise, the User authorises his/her personal data to be disclosed to the aforesaid companies in the SABA Group, with a view to him/her being sent commercial communications related to the services and products marketed by the group companies.

## **1.2. Purchase of products or services offered by SABA**

The data facilitated by the User for the purchase of any products or services offered by SABA shall be incorporated into an automated personal data file belonging to the SABA company with which the User enters into a contract (depending on the location of the parking space), and which appear in **Annex 1** for the following purposes:

- To manage and develop the contractual relationship between both Parties.
- To manage the payment process for the services and products offered on the Website.
- To contact the User to request his/her opinion or his/her participation in customer satisfaction surveys.
- To send personalised commercial communications in connection with the services and products offered by the SABA company with which the User enters into a contract, for which we may prepare buyer profiles and purchasing habit analyses from the information obtained from User's purchases.

Unless stated otherwise, the User authorises the aforesaid data to be disclosed to the aforesaid companies in the SABA Group (which are listed on the website [www.saba.eu](http://www.saba.eu)), with a view to his/her being sent commercial communications in connection with the services and products marketed by said companies.

## **2) Accuracy and appropriateness of data**

SABA hereby informs the User of the mandatory nature of the collection of data requested for the provision of services offered through the Website, except in those cases where it is indicated as optional.

The User shall be responsible for the truthfulness and accuracy of the personal data provided; SABA reserves the right to exclude any User providing false data from the registered service, without prejudice to any other actions applicable under the Law.

In the event of any change in data supplied, SABA would request Users to notify the company of the same as soon as possible in order to keep them updated. In this regard, the User undertakes to provide accurate information in relation to his/her personal data.

In the event that the User provides third party data, he/she guarantees that the said data has been gathered with the express consent of the holder thereof for disclosure to SABA, for the purposes of processing it as referred to in this Privacy Policy.

### **3) Provision of data**

Except for those companies for which disclosure of the data may be necessary, in the setting of the contractual relationship with the User, (e.g., banking institutions, for payment purposes) and/or for which the User has given his/her consent, SABA notifies and guarantees that the User's personal data shall not be provided to third parties. In any case, should SABA resolve to provide the User's personal data to third parties other than Group companies, the User's prior, express, informed and unequivocal consent shall be requested.

SABA may disclose information about the User without his/her prior consent if so demanded by the Law or required by a Court or Tribunal.

### **4) Legal age**

Only adult natural persons over the age of 18 with full legal standing may register on the Website. SABA reserves the right to verify the User's age at any time, and shall be entitled to cancel registration if it is ascertained that the User is under age. Similarly, in the event that a User selects a user name and identifier similar to another one for his/her account, SABA reserves the right to delete or reclaim the same, if considered appropriate.

### **5) Free text fields**

The purpose of the free text fields which may appear on the Website for Users' use (e.g., forms, evaluations, contact sections, etc.) is solely and exclusively to gather information for the purpose of improving the quality of the services.

Should the User provide data relating to ideology, beliefs, religion, union membership, health, sexual practices or racial origin through his/her comments, which have in no way been

requested by SABA, the User's acceptance to send the said data entails express consent for the processing of said data by SABA, and thus declares the titleholder thereof.

#### **6) Importing of information from social networks.**

The activation and use of external social networks of which the User is a member through SABA, as well as the possibility of importing data from the same to the registered account, entails the identification and authentication of the User on the external network, on the basis of which the data specified above will be extracted. SABA advises the User to review the terms of use and the privacy policy of those networks from which data on him/her is to be imported.

In any case, the User shall take into account that by accessing the aforesaid social networks, he/she is leaving the setting of SABA to access one that is beyond the control of SABA. Consequently, SABA shall not be held liable for any possible breaches of security in the aforesaid settings.

Once the data has been imported and incorporated into the User's registration account, his/her data shall be processed for the purposes described in this Privacy Policy. SABA guarantees that it will assume security measures in line with the applicable regulations, in addition to those which SABA may diligently decide to implement, without it being obliged, in any case, to establish security measures not required by the law.

#### **7) Rights of access, rectification, cancellation and/or opposition:**

In any case, SABA guarantees the User the exercising of his/her rights to access, rectify, cancel and oppose, by remitting the express request to the postal and/or e-mail addresses appearing in **Annex 1**, by indicating "LOPD" in the subject, and the company with which he/she wishes to exercise his/her rights. Pursuant to the applicable data protection regulations, the aforesaid request must contain the following data of the affected party: name and surname(s), address for the purpose of notifications, and a photocopy of his/her National ID document, or any other legally valid document accrediting his/her identity, and request on which the application is based.

Similarly, the User may revoke his/her consent for the remittance of commercial communications at any time by sending a request to SABA, to the address appearing at the start of this clause, addressed to [Departamentomarketing@saba.eu](mailto:Departamentomarketing@saba.eu), or to the e-mail address: [marketing@saba.eu](mailto:marketing@saba.eu).

## **II. COOKIES POLICY**

### **What are cookies?**

Users are advised that the Website uses cookies. Cookies are small data files generated in the User's computer which allow information to be stored which has been generated by the User's own activity in the network. Among other things, cookies allow a website to store and retrieve information on a user's browsing habits or on his/her computer and, depending on the information that they contain and the manner in which the computer is used, they may be used to recognise the User.

The cookies themselves are sent to the user's computer from a machine or domain administered by Saba Aparcamientos, S.A., (hereinafter, "SABA") and from where the services requested by the User are supplied. Third party cookies, however, are sent to the user's computer from a machine or domain that is not administered by the Company, but by another entity which processes the data obtained through the cookies.

This website uses session cookies (which gather and store data while the User is accessing the Website) and persistent cookies. Persistent cookies are stored on the User's computer so that the data gathered can be accessed and processed by the body responsible for the cookie for a definite period of time, which may vary from a few minutes to a number of years.

**Cookies used on this website**

The User does not provide this information directly. It is gathered automatically as a means of supporting the User's visit to the Website.

The following table identifies the cookies used on the Website, as well as whether they are first-party or third-party cookies, (along with identification of the third party contracted and whose services the User has decided to use) and for the following purpose:

First-party/ Third-party cookies	Entity which manages the cookies	Purpose
First-party cookies	<i>Saba</i>	<i>Those which are sent to your computer from a domain or group administered by SABA.</i>
Third-party cookies	<i>Google</i>	<i>Those which are sent to your computer from a machine or domain that is not administered by SABA but by another entity which processes the data obtained through the cookies.</i>
Session cookies	<i>Saba</i>	<i>They are deleted on leaving the website or when the browser session is closed.</i>
Persistent cookies	<i>Saba</i>	<i>These are cookies that are stored on your computer when the browser session is closed. Storage time may vary from a few minutes to a number of years.</i>

Analysis cookies	Saba/Google	<i>Those which are processed either by SABA or by third parties, allow us to quantify the number of visits and the use that Users make of our application in order to measure and statistically analyse their use, to correct any shortcomings detected, and to facilitate the use of the SABA website.</i>
Advertising cookies	Google	<i>When visiting the website, or running adverts for SABA products or services, and in order to control and monitor the efficacy of the advertising, cookies are installed in your browser or on your computer which help to measure, for example, the number of times an advert is viewed, where they appear, at what time they are viewed, where from, and if they have been viewed before.</i>
Behavioural advertising cookies	Google	<i>These are types of advertising cookies which are used to store and retrieve information on users' behaviour, obtained through the constant observation of their browsing habits, making it possible to develop a specific profile to offer them advertising on the basis thereof.</i>

SABA will not be held responsible for the content or accuracy of the Cookie Policies of third parties.

### **Management of cookies**

Notwithstanding the foregoing, the User may, at any time, set the Cookies allowed in his/her browser. Nonetheless, deactivating cookies may hinder the proper operation of certain sections of the Website.

Depending on the browser used, the installation options may be found in different sections. To this end, the User will need to consult the instructions for the browser in use to learn how to block or allow the installation of Cookies. For the following browsers, Users can find further information via the following links:

Chrome: <http://support.google.com/chrome/bin/answer.py?hl=es&answer=95647>

Explorer: <http://windows.microsoft.com/es-es/windows7/how-to-manage-cookies-in-internet-explorer-9>

Firefox: <http://support.mozilla.org/es/kb/habilita-y-deshabilita-cookies-que-los-sitios-we>

Safari: <http://support.apple.com/kb/ph5042>

The User may also use third-party Cookies blocking tools to detect Cookies on any Website and manage their installation. One such tool can be downloaded from the following link: <http://www.abine.com/dntdetail.php>.

### **Additional information**

Lastly, the User is informed that he/she can, at any time, revoke consent given for the use of cookies by the Company, by configuring the browser as explained in the previous point.

The Company may modify this Cookies Policy on the basis of legal and regulatory requirements, or for the purposes of adapting said policy to the instructions issued by the Spanish Data Protection Agency. Users are therefore advised to visit this page periodically to keep abreast of any amendments made to the same.

### **III. AMENDMENTS TO THE PRIVACY AND COOKIES POLICY**

SABA reserves the right to modify, update and/or adapt the Privacy and Cookies Policy to any amendment in the applicable legislation or the interpretation of the Spanish Data Protection Agency, or to introduce any amendment considered relevant or appropriate by SABA.

SABA shall notify Users of any change in the Privacy Policy and the Cookies Policy by means of a notice on the Website; any such change shall be applicable from the effective date of publication.

Date: 1 July 2016