



**ANNE REESE CONSULT**

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**PRIVACY POLICY NOTICE**

(In Compliance with the General Data Protection Regulation GDPR EU 2016/679 )

**PURPOSE**

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Law and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in Spain ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

**ABOUT US**

Firm: Anne Reese Consult  
Sole practitioner: Anne Reese – Reg no Y1064004S  
Address: C/Bonaire 9A, 1-B, 071012 Palma  
Phone: +34 971 966 698  
Email: [info@reeseconsult.net](mailto:info@reeseconsult.net)  
Data protection officer: Anne Reese

**HOW WE MAY COLLECT YOUR PERSONAL DATA**

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- you engage us to provide our services and during the rendering of such services
- you contact us by email, telephone or social media when you have a query about our services

**THE KIND OF INFORMATION WE MAY HOLD**

The information we hold about you may include the following:

- Your personal details (such as your name and/or address) or details of your company
- ID documentation and company certificates
- Economic background and tax status by obtaining documentation such as tax returns or pay slips in order to comply with our obligations in accordance with money laundering prevention regulations.
- Your personal and investment plans in order to provide property conveyance services
- Information we receive from other sources, such as co-operators such as banks, estate agencies, insurance agents etc.
- google, facebook and hitta.se in order to comply with money laundering prevention requirements

## **HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU**

We may process your personal data for purposes necessary for rendering our services agreed with you and to comply with our legal obligations.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent such as being on mailing lists, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### **Situations in which we will use your personal data**

We may use your personal data in order to:

- In accordance with our rendering of services to you such as property conveyance, tax advice, administrative tasks and relation with local authorities
- Provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

### **Data retention**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

### **Change of purpose**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## **SHARING DATA**

We may share your data with third parties where we are required by law, where it is necessary to administer the relationship between us and collaborating service providers or where we have another legitimate interest in doing so.

### **With whom will you share my data**

We may share your data with certain authorities and other service providers in order to provide the contracted services to you

- Relevant authorities such as Tax Office, Social Security, Foreign Police department (NIE applications) and local authorities.
- Co-operators and service providers such as legal, accountancy, tax or advisory firms.
- Other third party service providers such as banks, insurance companies or estate agencies

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data.

### **What about other third parties?**

We may share your personal data with other third parties, for example in the context of the possible sale of a property. We may also need to share your personal data with a regulator or to otherwise comply with the law.

## **TRANSFER PERSONAL DATA OUTSIDE THE EEA**

We will not transfer the personal data we collect about you outside of the EEA

## **DATA SECURITY**

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a relevant business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **RIGHTS OF ACCESS; CORRECTION, ERASURE, AND RESTRICTION**

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### **Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact Anne Reese: [anne@reeseconsult.net](mailto:anne@reeseconsult.net)

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example, in relation to being on a general mailing list for news and updates that you have indicated you would like to receive from us, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact Anne Reese: [anne@reeseconsult.net](mailto:anne@reeseconsult.net)

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### **CHANGES TO THIS NOTICE**

Any changes we may make to our privacy notice in the future will be provided to you by updates on our website: [Reeseconsult.es](http://Reeseconsult.es)

This privacy notice was last updated on 25 May 2018

#### **CONTACT US**

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email us on contact details above. You may use the forms provided by the Spanish Agency of Data Protection or any other third party. The forms must be signed by electronic signature or have a copy of relevant ID attached and then sent by post or email to the relevant Data Protection Point of Contact as set out above.

You also have the right to make a complaint to the Spanish Agency of Protection of Data at any time: [www.aepd.es](http://www.aepd.es).