

PRIVACY POLICY CLUB MONBUS

The present Privacy Policy provides detailed information on how MONFOBUS S.L., uses and protects your personal data when you apply for and/or join the Monbus Club, as well as the rights you have in this respect.

Applicable legislation

The processing of data by the organization is subject to Spanish and European legislation, specifically to the following:

- The GDPR ([Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons](#)) which is the new European Union regulation that unifies the regulation of the processing of personal data in the different EU countries.
- The LSSI ([Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce](#)) applies to information society service providers established in Spain and to the services provided by them.
- [Royal Decree-law 5/2018, of 27 July, on urgent measures for the adaptation of Spanish law to European Union regulations on data protection.](#)

Identity of the controller

For the purposes of Privacy Policy, the person responsible for the processing of personal data is:

- Company name: MONFOBUS, S.L. – CIF: B27103969
- Registered address: Calle Cotón de Arriba, 2, 27297 Lugo – (Lugo)
- E-mail for contacting the Data Protection Delegate: rgpd@monbus.es

Principles applicable to the processing of personal data

The processing of data by MONFOBUS S.L. conforms in all cases to the requirements established in the new European Data Protection Regulation, specifically to the following:

- **Principle of lawfulness, loyalty and transparency:** express consent is required prior to the processing of personal data.
- **Principle of data minimization:** in any case, only the data strictly necessary in relation to the purposes for which they are requested are requested.
- **Principle of limitation of the storage period:** the data will not be kept longer than strictly necessary for the purposes for which they are collected, informing of the storage period in each case.

- **Principle of integrity and confidentiality:** the data you provide us with will be processed by establishing the relevant guarantees to obtain adequate security and guaranteeing confidentiality.

When do we collect your personal data?

- When you become a member of Club Monbus, we collect the personal data you provide us with as part of your registration and any additional personal data you provide us with to update your registration data.
- Every time you contact us directly, for example, through the available e-mail, contact form, or by telephone to request information about our products and services.
- We also collect information about your purchasing preferences and activities. If you receive a service provided by companies under the trade name of MONBUS, we may collect and record your preferences about the way in which the service was provided in order to improve your experience next time and to provide you with all the advantages of Club Monbus membership.
- When you register or browse this website, cookies are stored. You can consult the Cookies Policy at any time for further information on the use of cookies and how to deactivate them.
- In individual cases, when with your permission, third party companies pass on your personal data to us. This gives us a clearer idea of the types of offers that may be of interest to you.
- Through third parties with which the data controller maintains a commercial or service provision relationship and for which it has to have your personal data in order to process the requested service or to comply with our contractual and regulatory commitments associated with the contracted service and/or for the verification of regulatory compliance under the responsibility of the organization.
- If the user associates or connects his/her account of the Monbus Club Platform with the service of a third party (e.g. Google, Facebook, Twitter) or if he/she logs into it in order to access it, the service of the third party will be able to send us information such as data of his/her registration and profile belonging to that service. This information is variable and is controlled by that service or as authorized by you through the privacy settings of that service.
- Throughout your membership of Club Monbus (if you have given us your consent to receive marketing communications), we may ask for your opinion on certain topics about your experiences with us.

What is the legitimacy for the processing of your data?

The legal basis for the processing of your data is the fulfilment of your request. The data requested are necessary for the correct provision of the same.

To comply with a legal obligation: administrative, commercial, tax, fiscal, accounting and financial regulations and consumer and user protection legislation.

Satisfy a legitimate interest of the Controller: Processing of data as parts of a commercial relationship and/or contract, which are necessary for its maintenance or compliance, transmissions of data within business groups for internal administrative purposes, fraud prevention, as well as cases of legitimate interest in which the controller could be an injured party and the processing and communication of the non-compliant data to third parties is necessary in order to manage regulatory compliance and the defense of the interests of the controller, as well as the legitimate interest of direct marketing enabled by the LSSICE (sending commercial communications about products or services similar to those contracted by the client with whom there is a prior contractual relationship).

Likewise, the legal basis may be determined by the consent of the data subject that has been provided to us unequivocally through formal means and/or by ticking the boxes provided for this purpose in the data protection clauses provided in the basic document that has regulated the commercial relationship depending on the contact channel.

What personal data do we collect?

Through the different services and contact channels described in this Privacy Policy, the following types of data may be collected:

- **Identifying data:** name, surname, identity document (tax identification number or code, foreigner identification number, passport or residence permit), date of birth, place of residence.
- **Contact data:** postal address, e-mail address, landline telephone number, mobile telephone number.
- **Transactional data:** information about purchases, bookings, billing and collection, payment methods, bank details and any data relating to your transactions with us.
- **Electronic data:** IP address, browser type and language, domain through which you access the Website, browsing data, profile entries.

MONFOBUS S.L. does not intentionally collect information about minors, unless it has the express consent of their parents or legal guardians, or unless they are the ones who provide it (for example, in the management of the purchase and/or booking of tickets). You warrant that you are at least 14 years of age.

Purpose of personal data collected

MONFOBUS S.L. processes the personal data provided for the following purposes:

- Management of the affiliation to the Monbus Club, your participation once registered so that you can make use of all the functionalities available, as well as to guarantee that the information we have is kept accurate and up to date.
- Attention to your queries and requests: Management of Answers to Queries, Complaints or Incidents, Requests for Information, Resources and/or Activities.
- Contacting the interested party through the means of communication provided (e-mail, postal address and/or telephone) in order to manage the queries sent to us through the channels provided for this purpose, manage notifications, notify changes in our services and coordinate actions derived from the services requested by persons related to MONFOBUS S.L. and/or by persons in charge of processing related to the same for the legitimized and/or consented purposes.
- Manage your subscription to our newsletter.
- The contact and sending of personal communications, invitations to events and gifts aimed at customers, congratulate you on special dates, carry out quality and satisfaction surveys, as well as to periodically inform you of new developments, news and corporate information, information on competitions, rates, offers and promotions of products and services of the organization, in order to evaluate the quality of our processes and provide you with offers of products and services of interest to you through the different means of communication provided, to the extent that you have consented to this.
- Communication to the rest of the companies that operate under the commercial name of MONBUS and companies adhered to the Monbus Club, whose updated list can be consulted here for the contact and sending of personal communications, invitations to events and gifts aimed at clients, carrying out opinion surveys, as well as to periodically inform you of new products and/or services, as well as corporate news and information and offers and promotions of products and services by telephone, written and electronic means, and such information may be appropriate to your particular pro
- Contacting and sending personal communications related to the service or support, such as updates, security alerts and account notifications.
- Management of your participation in competitions published on this website, including your image, in accordance with the legal bases that will be established in each case, and that you must consent to.
- To manage, protect, improve and optimize the Monbus Club Platform and your user experience, by means of quality work, research and development of new products and services, which allow us to offer you a better service.
- Management of your reservations and/or ticket purchases, as well as cancellations and resolution of incidents derived from them.

- Fulfilment of legal and regulatory obligations: to fulfil our legal obligations to comply with the information requirements issued by judicial bodies, regulatory and supervisory bodies and State Security Forces and Corps. MONFOBUS S.L., as the data controller, is subject to the laws of the countries in which it carries out its activity, and is obliged to comply with them. Among these obligations is included the delivery, in certain circumstances, of personal data to judicial bodies, regulatory or supervisory bodies and state security bodies and forces. These data processing operations are based on the existence of a legal obligation to cooperate with such bodies.
- To use your profile to better understand your shopping behavior in order to develop and improve our products and services to provide you with a better shopping experience; to analyze the effectiveness of our marketing communications and to provide you with offers, advice and information more relevant to you and our customers; to create a clearer picture to you, as a group and as individuals, to provide you with a seamless, relevant and consistent service, to the extent that you have unambiguously consented to this.
- To provide services that you may request or that we may offer as part of your membership.

Responsibility for the accuracy of the data

You are responsible for the veracity of the data provided, and MONFOBUS S.L. reserves the right to exclude you from the services provided in the event that you have provided false data, without prejudice to any other actions that may proceed in accordance with the Law.

Data retention period

The data provided will be kept for as long as the lawfulness of the processing relationship is maintained and the data subject does not request its deletion on expiry of the term of the relationship, with the exception of its retention for the formulation, exercise or defense of claims against the data controller or for the protection of the rights of another natural or legal person and/or for reasons of legal obligation.

The data processed for the sending of commercial communications will be kept until you revoke the consent given.

They will then be blocked, unless a longer retention period is required or permitted by law (e.g. for the formulation of the exercise or defense of claims), in which case they will be kept appropriately blocked for the time necessary before deletion.

Data recipients

We only use, transfer or share personal data with third parties on the terms described in this Privacy Policy. MONFOBUS S.L. does not sell or rent your personal data to third parties and will only disclose your personal data to persons or entities if we obtain your prior consent or in compliance or pursuant to applicable law where such consent is not necessary for a specific transfer.

We will share or give third parties access to your personal data when doing so is necessary to achieve one of the purposes described below and in accordance with applicable law:

- Companies that operate under the trade name of MONBUS S.L. in relation to the purposes described above in this Privacy Policy. In any case, these companies use them only as described in this Privacy Policy, always ensuring the confidentiality and security of the data.
- Our suppliers: MONFOBUS S.L. will communicate or allow access to your personal data to companies that provide services to us under a service provision contract, when it is necessary for the fulfilment of the purposes described above in this Privacy Policy. If any of these service providers need access to your personal data, we ensure that they use it only to provide a service to us and in accordance with our instructions. We also require them to maintain the confidentiality and security of the data and to return or destroy the data when it is no longer needed.
- Legal obligations: MONFOBUS S.L. will be able to communicate your personal data when the cession is authorized by law or is necessary to comply with a legal obligation, including the cession to the competent authorities, judges and courts.
- Compliance Complaints Channel (Complaints about breaches of regulations and code of conduct are forwarded to the Regulatory Compliance Unit).

Under what guarantees are your data communicated?

The communication of data to third parties is made to entities that accredit the provision of a Personal Data Protection System in accordance with current legislation.

Surfing the website of MONFOBUS S.L.

When browsing this website, non-identifiable data may be collected, which may include, among others, IP addresses, geographic location (approximately), a record of how services and sites are used, and other data that cannot be used to identify the user, unless the user registers with the site. Non-identifying data also includes data related to your browsing habits through third party services. This information is simply used to improve the navigability of the website and to try to offer the best service to the User.

For further information, please consult our **Cookies Policy**.

Secrecy and data security

MONFOBUS S.L. is committed to the use and treatment of the personal data you provide us with, respecting their confidentiality and using them in accordance with the purpose for which they were collected. Likewise, it undertakes to comply with the obligation to store them and to apply the appropriate measures to avoid their alteration, loss, treatment or unauthorized access, as established by the current data protection regulations.

MONFOBUS S.L. cannot, under any circumstances, guarantee the absolute impregnability of the Internet and therefore the violation of the data by means of fraudulent access by third parties such as hackers and others.

In the event of the occurrence of any security incident, the MONFOBUS S.L. website will immediately notify the User, providing all the necessary information with the Security Incident.

Acceptance and Consent

It is necessary that you read and agree with these conditions on the protection of personal data, accepting and consenting to the processing of the same, in the manner and for the purposes indicated in this Policy and in the Legal Notice.

Revocability

The consent given by you, both for the processing and for the transfer of the data, can be revoked at any time by communicating it to MONFOBUS S.L., in accordance with what is established in the present Privacy Policy for the exercise of the rights.

This revocation will not be retroactive in any case.

Your rights regarding the processing of your personal data

You, as the owner of the personal data, have the right to obtain confirmation about the possible processing of your personal data by MONFOBUS S.L. Thus, you have the right to access your personal data, as well as the right to request the rectification of the data that are inaccurate or, if necessary, to request their deletion when, among others, the data are no longer necessary for the purposes for which they were collected.

De igual forma, en determinadas circunstancias, podrá solicitar la **limitación del tratamiento** de sus datos, en cuyo caso únicamente serán conservados para el ejercicio o la defensa de posibles reclamaciones o similares.

For reasons related to your particular situation, you will be able to oppose to the treatment of your data, previous legitimate motivation, moment in which MONFOBUS S.L. will stop treating the data, except for the exercise or defense of possible claims.

You have the right to have your data transferred to another controller in a structured, commonly used and machine-readable form. This right of portability applies where the processing of your personal data is based on consent, or the performance of a contract and such processing is carried out by automated means.

You may withdraw your consent to the processing of your data at any time. Your exercise of these rights is subject to certain exceptions for reasons of general interest (e.g. the prevention or detection of criminal offences) and our own interests (e.g. maintaining the confidentiality of legal

advice). If you exercise any of these rights, we will check that you are in fact entitled to do so, and we will respond to you within one month or within the maximum period provided for in Spanish law, whichever is shorter.

Where to go to exercise your rights: If you wish to exercise your rights, please go to the channel established for the exercise of rights by the data controller: rgpd@monbus.es so that we can respond to your request in a managed manner.

Information required to exercise your rights: To exercise your rights, we need proof of your identity and the specific request you are making, as we request the following information:

- Documented information (writing/e-mail) of the request in which the request is made.
- Proof of identity as owner of the data subject (Name, surname(s) of the data subject and photocopy of the ID card of the data subject and/or of the person representing him/her, as well as the document accrediting such representation.
- Address for notification purposes, date and signature of the applicant (in the case of a written request), or full name and surname (in the case of an e-mail), or validation of the request in the private area of the communication channel with a personal identity authentication key.

Where the controller has reasonable doubts as to the identity of the natural person making the request, the controller may request that additional information necessary to confirm the identity of the data subject be provided.

General procedure for exercising your rights: Once we have received the requested information, we will proceed to respond to your request in accordance with the organization's general procedure for exercising your rights:

- The controller shall provide the data subject with information relating to its actions on the basis of a request in accordance with Articles 15 to 22 (Rights of the data subject), and in any event within one month of receipt of the request. This period may be extended by a further two months if necessary, taking into account the complexity and number of requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, stating the reasons for the delay.
- Where the data subject submits the request by electronic means, the information shall be provided by electronic means where possible, unless the data subject requests otherwise.
- If the controller does not act on the data subject's request, it shall inform the data subject without delay, and at the latest within one month of receipt of the request, of the reasons for its failure to act and of the possibility of lodging a complaint with a supervisory authority and of taking legal action.
- The information provided shall be free of charge, except for reasonable administrative costs.

- The controller may refuse to act on the request, by shall bear the burden of demonstrating that the request is manifestly unfounded or excessive.

Commercial Mail

In accordance with the LSSI-CE, MONFOBUS S.L. does not carry out SPAM practices, not sending commercial information e-mails by electronic means that are not properly identified and that have not been previously requested or authorized.

Changes to this Privacy Policy

MONFOBUS S.L. reserves the right to carry out, at any time, as many modifications, variations, suppressions or cancellations in the contents and in the form of presentation of the same that it considers opportune to adapt it to new legislation or jurisprudence, as well as to the practices of the organization, therefore we recommend you consult our privacy policy whenever you consider it pertinent. If you do not agree with any of the changes, you may exercise your rights in accordance with the procedure described above by sending an email to rgpd@monbus.es.

By accepting and/or validating the process, you expressly consent to the processing of data in accordance with the provisions of the clause and additional information on data protection, as well as to inform and obtain the consent of third parties from whom you provide us with personal data for such processing.