



SENASA

# **RECORD OF PERSONAL DATA PROCESSING ACTIVITIES**

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**PROTECTION OF PERSONAL DATA**

***DATA CONTROLLER***



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## **RPDPA 01-001: MANAGEMENT OF EVENTS, CORPORATE EVENTS, AGENDA AND INSTITUTIONAL RELATIONS.**

<b>Data Controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A. (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control the personal data of suppliers and institutional contacts.</p> <p>Management and control the personal data of third parties participating in forums, events and other corporate events.</p> <p>Management and control the personal data of employees (and their families) participating in forums, events and other corporate events.</p>



<b>Legal basis</b>	<p>Art. 6.1.a) of GDPR: consent to the processing of the image by the data subject.</p> <p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p>
<b>Expected timeframes for deletion</b>	<p>Personal data of agenda and institutional relations on a permanent basis as long as the persons concerned maintain their position or professional position related to SENASA or have not requested the deletion of their data, and do not request the deletion of their data.</p> <p>In corporate events, 5 years after publication or registration, the data will be deleted in all media.</p> <p>The data of minors will be deleted after 2 years.</p> <p>Photographs of academic promotions will be kept permanently for historical-academic purposes, with the express consent of the student, instructors and other subjects, as long as the deletion is not requested.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number, e-mail, handwritten signature, body image (face) by photograph or video and voice.</p>
<b>Categories of data subjects</b>	<p>Staff, students, institutional contacts, suppliers, customers and other third parties participating in forums, events and other corporate events.</p>



<b>Categories of recipients</b>	Justice Administration, Police Forces. ENAIRE. AESA.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-002: ILLICIT-REPORTING SYSTEM (WHISTLEBLOWING)

<b>Data controller</b>	Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A. (SENASA)  Avenida de la Hispanidad, 12, 28042 Madrid  N.I.F. A-79.818.423  Contact telephone number 91 301 98 96
<b>Data Protection Officer (DPO)</b>	dpo@senasa.es
<b>Purposes of the treatment</b>	Management and control the personal data derived from complaints, suggestions, claims and reports submitted to this channel for consideration or investigation.
<b>Legal basis</b>	Art. 6.1.a) of GDPR: consent to the processing by the data subject.  Art. 6.1.b) of GDPR: contractual coverage.  Art. 6.1.c) of GDPR: legal obligation.  Art. 6.1.f) of GDPR: satisfaction of legitimate interests.  Law 2/2023, from 20 February, which regulates the protection of persons to report on violations policy and fight against corruption (whistleblowing).



<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible liabilities that may arise from that purpose and the processing of the data, being a maximum of 4 years from the end of the employment relationship.</p> <p>Communications that have not been followed up will be recorded in anonymized form, without the blocking obligation provided for in Art. 32 of LOPDGDD, being applicable. They will be kept for a period of 3 months from the notification of non-admission if no new information is provided.</p>
<b>Categories of personal data</b>	<p>Those provided by the person who addresses the channel and those other general personal identifiers strictly necessary for the management of the requested action.</p>
<b>Categories of data subjects</b>	<p>Employees, customers, clients, suppliers, students and the company in charge of the processing.</p>
<b>Categories of recipients</b>	<p>Justice Administration, State Attorney's Office, Police Forces, and any other competent administrations depending on the complaint filed or the findings.</p>



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.





## RPDPA 01-003: COMPLAINT, ADMINISTRATIVE AND JUDICIAL FILES

<b>Data controller</b>	Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)  Avenida de la Hispanidad, 12, 28042 Madrid  N.I.F. A-79.818.423  Contact telephone number 91 301 98 96
<b>Data Protection Officer (DPO)</b>	<a href="mailto:dpo@senasa.es">dpo@senasa.es</a>
<b>Purposes of the processing</b>	Management and control of personal data contained in disciplinary, administrative and judicial files, and in claims arising from contracts with customers, suppliers and students.
<b>Legal basis</b>	Art. 6.1.b) of GDPR: contractual coverage.  Art. 6.1.c) of GDPR: legal obligation.  Art. 6.1.f) of GDPR: satisfaction of legitimate interests.



<b>Expected timeframes for deletion</b>	They will be kept permanently for historical purposes, as well as to cover possible legal liabilities according to the deadlines in each case.
<b>Categories of personal data</b>	General: name and surname, ID number, telephone number, e-mail, handwritten signature and economic data.
<b>Categories of data subjects</b>	Employees, customers, suppliers and students.
<b>Categories of recipients</b>	Justice Administration, State Attorney's Office, Labor Inspection, financial entities, notaries and any other administrations with competences in the matter.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA RAT 01-004: PUBLICATIONS CENTER

<b>Data controlar</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data in connection with loans of bibliographic material, purchases and online sale of books.</p>
<b>Legal basis</b>	<p>Art. 6.1.a) of GDPR: consent to the processing by the data subject.</p> <p>Art. 6.1.b) of GDPR: contractual coverage.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 5 years from the delivery or sale of the product.</p>



<b>Categories of personal data</b>	General: name and surname, ID, telephone number, e-mail, handwritten signature. Data of electronic means of payment.
<b>Categories of data subjects</b>	Employees, customers and suppliers.
<b>Categories of recipients</b>	Not foreseen.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## TRATAMIENTO RAT 01-005: OCCUPATIONAL RISK PREVENTION

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management of occupational risk prevention and health surveillance of SENASA employees in order to comply with the provisions of Law 31/1995 of November 8, 1995, on Occupational Risk Prevention.</p>



<b>Legal basis</b>	<p>Art. 6.1.c) of GDPR: legal obligation.</p> <p>Art. 6.1.e) of GDPR: processing necessary for the performance of a task carried out in the public interest of the Data Controller.</p> <p>Art. 9.2.b) of GDPR: processing necessary for the performance of obligations and exercise of specific rights of the Data Controller or the data subject in the field of labor law and social security and social protection.</p> <p>Art. 9.2.h) of RGPD: processing necessary for the purposes of preventive or occupational medicine, assessment of the worker's capacity to work, medical diagnosis.</p> <p>Law 31/1995, of November 8, 1995, on Occupational Risk Prevention.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 5 years from the termination of the employment contract or the relationship with the supplier.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number, e-mail, handwritten signature, date of birth.</p> <p>Personal characteristics (sex, height); work characteristics (job position, shift/days of service, place of work); data related to work-related accidents: severity, manner in which the accident occurs, part of the body affected, medical examinations, knowledge of pregnancies, SS affiliation number.</p> <p>Personal data of physical service providers in our facilities: social security, medical examination - apt, training certificates.</p>



<b>Categories of data subjects</b>	Employees, External Prevention Service Provider and Occupational Accident Mutual Society.
<b>Categories of recipients</b>	Justice Administration, Labor Inspection, external auditors, air force bases, civilian air traffic owers, Instituto Cartogràfic i Geològic de Catalunya (ICGC).
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-006: RECRUITMENT PROCESS

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management of personnel selection and internal promotion processes.</p> <p>Management of entities and candidates for curricular and professional practices.</p>





<b>Legal basis</b>	<p>Article 6.1.a) of GDPR: consent to the processing by the data subject.</p> <p>Article 6.1.c) of GDPR: legal obligation.</p> <p>Royal Legislative Decree 2/2015, of October 23, approving the revised text of the Workers' Statute Act (employments rights).</p>
<b>Expected timeframes for deletion</b>	<p>The CV of unsuccessful external applicants will be deleted once the position offered has been filled, unless expressly authorized to remain in the labor exchange for 18 months.</p> <p>The data of candidates for curricular and professional internships who are not selected will be deleted.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number, e-mail, academic and professional information (certificates, licenses, degrees).</p>
<b>Categories of data subjects</b>	<p>External applicants, own employees, and external supplier that helps in the management.</p>
<b>Categories of recipients</b>	<p>Not foreseen.</p>



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-007: PAYROLL MANAGEMENT, CONTRIBUTIONS AND LABOR RELATIONS

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of own employees in relation to employment contracts, payroll, registrations and cancellations, employee training, meal allowance cards, social benefits, life insurance and management of union activity.</p> <p>Management and control of personal data of external contracted personnel and students/scholarship holders for curricular or professional internships.</p>
<b>Legal basis</b>	<p>Art. 6.1.a) of GDPR: consent to the processing by the data subject.</p>



	<p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1c) of GDPR: legal obligation.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible liabilities that may arise from said purpose and the processing of the data, being a maximum of 4 years from the end of the employment or internship relationship. However, employment contracts will be kept for a maximum period of 10 years.</p> <p>In the case of independent professionals, the Expected timeframes for deletion will be 5 years from the end of their activity.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number, e-mail, address, handwritten signature, social security number, family book and financial data. Judicial and administrative resolutions notified in relation to workers.</p> <p>From independent professionals those strictly necessary for invoicing.</p> <p>From students / scholarship holders in curricular or professional practices those strictly necessary by legal imperative.</p>
<b>Categories of data subjects</b>	<p>Employees, independent professionals, students / interns in curricular or professional practices, and external suppliers of tools and applications that enable this management.</p>



<b>Categories of recipients</b>	AEAT, IGAE, Labor Inspection, SEPE, DELTA System, RED System, FUNDAE, external auditors, Tribunal de Cuentas (Court of Auditors), Justice Administration, Ministry of Transport and Sustainable Mobility and Conflict of Interest Office.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-008: TIME ATTENDANCE CONTROL SYSTEM

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management of the monitoring of workers' timekeeping and of their unjustified absences.</p>
<b>Legal basis</b>	<p>Art. 6.1.c) of GDPR: legal obligation.</p> <p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p> <p>Royal Legislative Decree 2/2015, of October 23, approving the revised text of the Workers' Statute Act (employments rights).</p>



<b>Expected timeframes for deletion</b>	They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine the possible responsibilities that may arise from said purpose and the processing of the data, being a maximum of 4 years, from the respective date, unless there are related disciplinary or judicial proceedings.
<b>Categories of personal data</b>	General: name and surnames.
<b>Categories of data subjects</b>	Employees and company providing this service.
<b>Categories of recipients</b>	Justice Administration, State Attorney's Office. Processor in SENASA 's Illicit-reporting System, if applicable.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-009: INTERNAL TRAINING

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of employees and external trainers, if applicable.</p>
<b>Legal basis</b>	<p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p>





<b>Expected timeframes for deletion</b>	They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine the possible liabilities that may arise from this purpose and from the processing of the data, with a maximum of 4 years from the end of the employment relationship.
<b>Categories of personal data</b>	General: name and surname, ID, telephone number, e-mail, address, certificates, exams and qualifications.
<b>Categories of data subjects</b>	Employees and external instructors.
<b>Categories of recipients</b>	AESA and FUNDAE.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-010: EXTERNAL TRAINING

<b>Data controller</b>	Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)  Avenida de la Hispanidad, 12, 28042 Madrid  N.I.F. A-79.818.423  Contact telephone number 91 301 98 96
<b>Data Protection Officer (DPO)</b>	dpo@senasa.es
<b>Purposes of the processing</b>	Management and control of personal data of suppliers, customers, employees and students in connection with SENASA's training activities.
<b>Legal basis</b>	Art. 6.1.a) of GDPR: consent to the processing by the data subject.  Art. 6.1.b) of GDPR: contractual coverage.  Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.



<b>Expected timeframes for deletion</b>	<p>They shall be kept for the time necessary to comply with the purpose for which they were collected and to determine any possible liabilities that may arise from this purpose and from the processing of the data, with a maximum of 5 years from the notification of the qualification or certificate, or, where appropriate, the notification of failure to pass. In the case of own employees, the period shall be 4 years from the termination of the employment relationship.</p> <p>In the case of audio recordings carried out in certain courses or exams, the files will be kept blocked for a period of 1 year from the notification of qualifications or certificates, unless a shorter period is expressly agreed and reported.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number, e-mail, address, handwritten or electronic signature and financial data. Data of minors. Image and voice recordings. Qualifications and certificates / diplomas.</p>
<b>Categories of data subjects</b>	<p>Employees, students, suppliers and customers.</p>
<b>Categories of recipients</b>	<p>ENAIRE, DGAC and AESA. Justice Administration.</p>



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-011: QUALITY AND INTERNAL AUDIT

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Internal audits of procedures and processes, management of external certifications and quality surveys.</p>
<b>Legal basis</b>	<p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p>



<b>Expected timeframes for deletion</b>	They will be kept for the time necessary to comply with the purpose for which they were collected and to determine any possible liabilities that may arise from this purpose and from the processing of the data, with a maximum of 5 years from their collection.
<b>Categories of personal data</b>	General: name and surname, corporate e-mail, academic and professional data.
<b>Categories of data subjects</b>	Employees and accredited certifying entities.
<b>Categories of recipients</b>	Justice Administration.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-012: CONTRACT MANAGEMENT

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of suppliers, clients, and employees.</p>
<b>Legal basis</b>	<p>Artículo 6.1.c) del GDPR: legal obligation.</p> <p>Law 9/2017, of 8 November, on Public Sector Contracts.</p> <p>Royal Decree 3/2020, of 4 February, on urgent measures transposing into Spanish law various European Union directives</p>



	in the field of public procurement in certain sectors; private insurance; pension plans and funds; taxation and tax litigation.
<b>Expected timeframes for deletion</b>	They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any possible liabilities that may arise from this purpose and from the processing of the data, for a maximum period of 5 years.
<b>Categories of personal data</b>	General: name and surname, date of birth, ID, telephone number, e-mail and handwritten signature.  Other: professional and academic data.
<b>Categories of data subjects</b>	Employees, suppliers and clients.
<b>Categories of recipients</b>	IGAE, Tribunal de Cuentas (Court of Auditors), State Contracting Platform, Public Sector Contracts Registry, Directorate General of State Assets, external auditors, Justice Administration, State Attorney's Office, insurance company and mediating entity, and OJEU.





<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-013: ECONOMIC AND ADMINISTRATIVE MANAGMENT

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	dpo@senasa.es
<b>Purposes of the processing</b>	<p>Management and control of personal data in relation to the payment of invoices to suppliers and collections from customers. Registration of suppliers. Corporate travel management. Payroll, per diems and productivity hours.</p>
<b>Legal basis</b>	<p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1.c) of GDPR: legal obligation.</p> <p>Law 9/2017, of 8 November, on Public Sector Contracts.</p>



	<p>Law 58/2003, of December 17, 2003, General Tax Law.</p> <p>Law 27/2014, of November 27, 2014, on Corporate Income Tax.</p> <p>Royal Decree 462/2002, of May 24, 2002, on indemnities.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible liabilities that may arise from said purpose and the processing of the data, being a maximum of 5 years from the end of the contractual relationship or the end of the tax period of each tax.</p> <p>The accounting books, the journal, the inventory book of annual accounts, the general ledger, the commercial books, the minutes book, the book of registered shares, the external audit reports, the administration reports and the invoices must be kept for 6 years, as from the last entry made in the books.</p> <p>Documentation relating to the prevention of money laundering must be kept for a period of 10 years.</p>
<b>Categories of personal data</b>	<p>General information: name and surname, ID, telephone number, e-mail, address, handwritten signature and financial data.</p>
<b>Categories of data subjects</b>	<p>Employees, clients and suppliers.</p>



<b>Categories of recipients</b>	Financial institutions, National Institute of Social Security, AEAT, IGAE, INE, Ministry of Finance, Tribunal de Cuentas (Court of Auditors), Justice Administration, external auditors and board members.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-014: COMMERCIAL AND PROJECT MANAGEMENT

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of clients in the development of the projects contracted to the company, calculation of people's rates, justification of direct and indirect costs. Exploitation of the company's real estate assets. Sale of aircrafts.</p>



<b>Legal basis</b>	<p>Art. 6.1.a) of GDPR: consent to the processing of the image by the data subject.</p> <p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 5 years from the end of the relationship, unless a longer period by obligation of commercial legislation.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number, e-mail, handwritten / electronic signature.</p>
<b>Categories of data subjects</b>	<p>Clients.</p>
<b>Categories of recipients</b>	<p>Justice Administration, external auditors, notaries, Land and Property Registry, Movable Property Registry, banks and credit institutions.</p>



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-015: MAILING

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of students and alumni through promotional mailings advertising SENASA's training activities.</p>
<b>Legal basis</b>	<p>Art. 6.1.a) of GDPR: consent to the processing of the image by the data subject.</p> <p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p>





	<p>Law 34/2002, of July 11, 2002, on information society services and electronic commerce.</p> <p>Royal Legislative Decree 1/2007, of November 16, which approves the revised text of the General Law for the Defense of Consumers and Users and other complementary laws.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept permanently as long as the owner has not expressly objected and has given his express prior consent at the time of provision of personal data, and so keep it as long as not expressly revoked at any time thereafter.</p>
<b>Categories of personal data</b>	<p>General: name and surname, ID, telephone number and e-mail.</p>
<b>Categories of data subjects</b>	<p>Students and alumni, contacts of natural persons in charge of human resources of companies in the sector.</p>
<b>Categories of recipients</b>	<p>Justice Administration, administrative authorities in the field of consumption.</p>



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-016: PHYSICAL SECURITY AND ACCESS CONTROL SYSTEM

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of visitors to SENASA facilities (suppliers, students, clients and any other third parties) and registration of incidents.</p> <p>Recording of images through CCTV to ensure the safety of people, facilities and goods, and recording of all access to the interior of SENASA's premises.</p> <p>Control of individual parking cards enabled, in cars parked inside SENASA's premises.</p>



<b>Legal basis</b>	<p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests pursued by the data controller.</p> <p>Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights.</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 5 years since they were collected.</p> <p>License plates of employees' vehicles until the end of their employment relationship or cancellation of the vehicle.</p> <p>In the case of CCTV video surveillance, the images from the cameras will be deleted within a maximum period of one month if they have not been required by an ongoing police or judicial investigation, or in the exercise of an internal disciplinary procedure.</p>
<b>Categories of personal data</b>	<p>General information: name and surname, ID card number, vehicle registration number. Verification of enabled parking cards.</p> <p>Recording of facial and body image.</p>



<b>Categories of data subjects</b>	Employees, suppliers, students, clients and visitors in general. Security company that collects personal data of visitors.
<b>Categories of recipients</b>	Police Forces, Justice Administration. Insurance companies.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-017: INFORMATION SYSTEM

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of personal data of employees, suppliers, customers and students as a result of the use of applications, software, tools, resources and devices used / provided by SENASA.</p>
<b>Legal basis</b>	<p>Artículo 6.1.b) del GDPR: contractual coverage.</p> <p>Artículo 6.1.c) del GDPR: legal obligation.</p> <p>Law 40/2015, of October 1, 2015, on the Legal Regime of the Public Sector.</p>



	<p>Law 59/2003, of December 19, 2003, on electronic signature.</p> <p>Royal Decree 311/2022, of 3 May, approving the ENS (National Security Framework).</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 5 years from their collection.</p> <p>In the case of employees, personal data and user account will be deleted the day after the termination of the employment contract, unless blocked by non-agreed termination.</p>
<b>Categories of personal data</b>	<p>General data: name and surname, ID, telephone number, e-mail address, handwritten and electronic signature, credentials (user name and password), job title, computer IP.</p>
<b>Categories of data subjects</b>	<p>Employees, suppliers, external students and visitors in general.</p>
<b>Categories of recipients</b>	<p>Justice Administration. Police Forces.</p>



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.





## RPDPA 01-018: INFORMATION SECURITY AND PERSONAL DATA

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control of obligations established in terms of personal data protection and information security through the DPO and the CSI (Information Security Committee):</p> <ul style="list-style-type: none"><li>- Complaints on data protection matters.</li><li>- Exercise of the rights of individuals over their data.</li><li>- Requirements of the Control Authorities.</li><li>- Management of security breaches.</li><li>- Security incidents.</li><li>- Management of information security requests.</li></ul>



	<p>- Internal audits.</p>
<b>Legal basis</b>	<p>Art. 6.1.b) of GDPR: contractual coverage.</p> <p>Art. 6.1.c) of GDPR: legal obligation.</p> <p>Art. 6.1.f) of GDPR: satisfaction of legitimate interests.</p> <p>Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights.</p> <p>Royal Decree 311/2022, of 3 May, approving the ENS (National Security Framework).</p> <p>Law 40/2015, of October 1, 2015, on the Legal Regime of the Public Sector.</p> <p>Law 2/2023, from 20 February, which regulates the protection of persons to report on violations policy and fight against corruption (whistleblowing).</p>
<b>Expected timeframes for deletion</b>	<p>They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 5 years from their collection. In the case of employees, 4 years after the end of the employment relationship.</p>



<b>Categories of personal data</b>	General: name and surname, e-mail, address, handwritten or electronic signature, job position and other personal data that are essential for the management of the file.
<b>Categories of data subjects</b>	Employees, suppliers, clients and students.
<b>Categories of recipients</b>	Police Forces, Justice Administration, National Cryptologic Center, AEPD and other competent control authorities.
<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.



## RPDPA 01-019: EUROPEAN GRANT PROJECT – NEXT GENERATION FUNDS

<b>Data controller</b>	<p>Servicios y Estudios para la Navegación Aérea y la Seguridad Aeronáutica, S.M.E., M.P., S.A (SENASA)</p> <p>Avenida de la Hispanidad, 12, 28042 Madrid</p> <p>N.I.F. A-79.818.423</p> <p>Contact telephone number 91 301 98 96</p>
<b>Data Protection Officer (DPO)</b>	<p>dpo@senasa.es</p>
<b>Purposes of the processing</b>	<p>Management and control, as a Collaborating entity, the subsidies of the “Digital Training Check in Transport” Program within the framework of the Next Generation EU Recovery, Transformation and Resilience Plan, in collaboration with the Secretary of State for Transport and Sustainable Mobility.</p>
<b>Legal basis</b>	<p>Art. 6.1.a) of GDPR: consent to the processing by the data subject.</p> <p>Art. 6.1.c) of GDPR: legal obligation.</p> <p>Art. 6.1.e) of GDPR: exercise of official authority.</p>



	Law 38/2003, of November 17, 2003, General Law on Subsidies.
<b>Expected timeframes for deletion</b>	They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and the processing of the data, being a maximum of 4 years from the completion of the administrative file.
<b>Categories of personal data</b>	General: name and surname, ID, e-mail, address, handwritten or electronic signature, training certificate.
<b>Categories of data subjects</b>	Beneficiaries of the subsidies.
<b>Categories of recipients</b>	State Secretariat for Transport and Sustainable Mobility, Police Forces, Justice Administration.



<b>International data transfers</b>	Not foreseen.
<b>Organisational security measures</b>	All security measures in accordance with Royal Decree 311/2022 approving the ENS (NATIONAL SECURITY FRAMEWORK), in which SENASA has obtained the Certificate of Conformity in the Medium category.

SENASA