



Creating materials banks  
from digital urban mining

## SUM4Re Privacy Policy

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## 1. Data Controller.

**Estudios Rafer S.L.**

**CIF:** B27239136

**Address:** Pena do Rei, 4 , Lugo 27002, Spain.

**Contact email:** [alec.butcher@estudiosrafer.es](mailto:alec.butcher@estudiosrafer.es)

**Phone number:** +34 678 97 58 86

**Data Protection Officer:** Ramón Martínez Gómez

**Contact email:** [formacion@estudiosrafer.es](mailto:formacion@estudiosrafer.es)

## 2. Purposes of the processing.

The participants' personal data will be processed for the following purposes:

- **Managing registration and access to the SUM4Re platform.**
- **Administrative and academic management** of training (registrations, attendance control, progress monitoring, evaluations).
- **Issuance of certificates, diplomas or accreditations** related to training.
- Communications related to the course, **notices, reminders, technical issues or relevant information.**
- Compliance with legal obligations, **especially in tax, labor or educational matters.**
- Service improvement and internal statistical analysis, **always using anonymized data whenever possible.**
- **Handling requests to exercise rights** in matters of data protection.
- **Use of third-party technological tools** necessary for the provision of the service (videoconferences, storage, internal messaging, etc.).

## 3. Legitimization of the processing.

Data processing is based on:

- **Contract execution:** provision of training services and management of the platform.
- **Compliance with legal obligations** applicable to Estudios Rafer S.L.
- **Consent of the interested party**, when it concerns purposes not necessary for the provision of the service (for example, commercial communications).



- **Legitimate interest**, in cases such as improving the service or the security of the platform, always within legal limits.
- Certifying or financing entities for training (if applicable).
- Technology providers that provide services necessary for the operation of SUM4Re (web hosting, videoconferencing, email, etc.), always under a **data processing agreement**.

No international data transfers will be made unless a technology provider is located outside the European Economic Area. In that case, appropriate safeguards will be ensured (Standard Contractual Clauses, adequacy decisions, etc.).

#### 4. Categories of data processed.

- **Identifying information:** name, surname, ID/NIE, date of birth.
- **Contact information:** email, phone, address.
- **Academic data:** educational history, grades, progress, attendance.
- **Access data:** username, password, activity logs.
- **Image and voice:** if videoconferences or recordings are used (expressly inform if they are recorded).

#### 5. Origin of the data.

The data comes directly from the participant during the registration process or while using the platform. In the case of registrations managed by companies or public entities, the following will be indicated:

- They may also come from the entity that finances or manages the training.

#### 6. Recipients and transfers of data.

The data may be communicated to:

- Competent public authorities, when there is a legal obligation.
- Certifying or financing entities for training (if applicable).
- Technology providers that provide services necessary for the operation of Sum4re (web hosting, videoconferencing, email, etc.), always under a **data processing agreement**.

No international data transfers will be made, unless a provider The technology is located outside the European Economic Area. In that case, appropriate measures will be ensured (Standard Contractual Clauses, adequacy decisions, etc.)

## 7. Storage periods.

The data will be retained:

- For the duration of the training relationship.
- During the applicable statutory limitation periods (e.g., 5 years for contractual liabilities).
- Academic data linked to certificates may be kept for the time necessary to accredit the training carried out.
- Data processed with consent will be kept until the student withdraws it.

## 8. Participant Rights.

The participant may exercise the following rights:

- Right to **information**.
- Right of **access**.
- Right of **rectification**.
- Right to **erasure** and **to be forgotten**.
- Right to **limit processing**.
- Right to **object**.
- Right to **portability**.
- Right **not to be subject to automated decisions**, including profiling.
- Right to **withdraw consent** at any time.

To exercise these rights, you may send a request to the center's physical address or to the email address indicated in this policy, with the subject line "**Exercise of GDPR rights**", including:

- Name and surname.
- Address or email address for notification purposes.
- Specific request.
- Proof of identity document.
- If acting on behalf of another person, a document proving representation.



- If you believe that your rights have not been respected, you can file a complaint with the **Spanish Data Protection Agency**.

## 9. Data Security.

Estudios Rafer S.L. will apply the necessary technical and organizational measures to guarantee the confidentiality, integrity and availability of the data, including:

- Access control.
- Communication encryption.
- Backups.
- Internal security protocols.
- Contracts with technology providers.

## 10. Participant duties.

The participant agrees to:

- Provide truthful and up-to-date information during the registration process.
- Keep your personal information up to date.
- Make proper and safe use of the SUM4Re platform.
- Respect the rules of coexistence and use established by Estudios Rafer S.L.

## 11. Use of cookies

The platform uses its own and third-party cookies to ensure its functionality, analyze usage, and improve the user experience. You can find detailed information in the **Cookie Policy**.

## 12. Policy modifications.


**Estudios Rafer S.L.** may update this policy to adapt it to regulatory changes or service improvements. Modifications will be communicated through the platform.



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[www.sum4re.eu](http://www.sum4re.eu)

[sum4re@uvigo.gal](mailto:sum4re@uvigo.gal)

 [SUM4Re](#)

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