Privacy policy

This English translation is provided for information purposes. In the event of any discrepancy, the Spanish version shall prevail.

(Regulation (EU) 2016/679 – GDPR, and Spanish Organic Law 3/2018 on Personal Data Protection and Guarantee of Digital Rights – LOPDGDD)

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1. Data controller

- **Trade name:** Cabrera Kapital
- **Business address:** Calle Sta. Eulalia 9, La Cuesta, San Cristóbal de La Laguna, Spain
- **Contact email:** financiacion@cabrerakapital.com

Cabrera Kapital is the controller of the personal data collected through this website and in the course of providing real estate credit intermediation services.

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2. Purposes of processing

Personal data will be processed for the following purposes:

- Handling enquiries made through the website.
- Analysing the client's financial profile.
- Assessing mortgage feasibility.
- Intermediation with financial institutions.
- Personalised advice on real estate credit.
- Contract and administrative management.
- Compliance with applicable legal obligations.
- Sending communications related to the service requested.
- Producing anonymous statistics on the use of the website.

3. Categories of data processed

The following categories of data may be processed:

- Identification data (name, national ID/foreigner ID number (DNI/NIE), address, telephone, email).
- Economic and financial data (income, expenses, employment status, CIRBE report from the Bank of Spain's Central Credit Register, Social Security employment history, bank statements).
- Data relating to the real estate transaction.
- Any documentation required for the mortgage assessment.

No personal data will be processed that is unnecessary for the purpose of the service.

4. Legal basis for processing

The legal basis for processing is:

- The consent of the data subject.
- The performance of a contract or pre-contractual measures.
- Compliance with legal obligations arising from financial regulations.
- Legitimate interest in the professional management of the relationship.

5. Data collected through this website

Contact form. When you submit the form, the data you enter are collected (name, telephone, email, type of client, details of the transaction or company and your message). They are used solely to answer your enquiry and, where applicable, to prepare the assessment requested. The legal basis is your consent, given by ticking the acceptance box, and the application of pre-contractual measures at your request. The data are sent by email to Cabrera Kapital through the Resend delivery service.

Visitor statistics. To find out which pages are viewed we use Umami, an analytics tool that does not set cookies, does not store the full IP address and does not create profiles of the people who visit the website. Only aggregated data are obtained (pages viewed, country,

device type and browser, referring page). The legal basis is the legitimate interest in understanding how the website is used in order to improve it.

Google map. The map on the contact page is provided by Google. It is only loaded if you accept cookies or press «Show map»; at that point Google receives your IP address and may set its own cookies. Google processes that data as an independent controller under its privacy policy (policies.google.com/privacy). More information in the Cookie policy.

Technical logs. When you visit the website, the server records technical data needed to serve it and protect it against attacks (IP address, date and time, page requested and browser). They are kept for a short time and used only for security purposes.

6. Disclosure of data to third parties

To provide the service properly, data may be disclosed to:

- Financial institutions in order to process financing applications.
- Notaries, valuation companies and other professionals involved in the transaction.
- Public bodies where there is a legal obligation.

Data will be disclosed exclusively for the purpose of the transaction and, where necessary, with the client's express consent.

Cabrera Kapital does not sell or trade personal data to third parties.

7. Service providers

Cabrera Kapital uses providers that access personal data only to provide their service, as data processors and under the contract required by Article 28 of the GDPR:

- **Cloudflare, Inc.:** website hosting, content delivery and protection against attacks.
- **Resend (Plus Five Five, Inc.):** email delivery of contact form messages.
- **Umami Software, Inc.:** anonymous visitor statistics.
- **Cabrera Kapital's email provider**, where enquiries are received and stored.

8. International transfers

Some of these providers are based in the United States or may process data outside the European Economic Area. In such cases, the transfer is covered by the EU-US Data Privacy Framework, where the provider has signed up to it, or by the standard contractual clauses approved by the European Commission.

9. Data retention

Personal data will be kept:

- For as long as the contractual relationship lasts.
- For the periods required by tax and financial legislation.
- For as long as legal liabilities may arise.

Enquiries received through the form that do not lead to a contractual relationship will be kept for as long as necessary to handle them and for a maximum of one year.

Once these periods have ended, the data will be blocked or deleted in accordance with current legislation.

10. Rights of the data subject

Users may exercise the following rights at any time:

- Right of access.
- Right to rectification.
- Right to erasure.
- Right to restriction of processing.
- Right to object.
- Right to data portability.
- Right to withdraw consent, without affecting the lawfulness of processing carried out before its withdrawal.

To exercise these rights, you may send a written request together with a copy of an identity document to the email address given above.

You also have the right to lodge a complaint with the Spanish Data Protection Agency (AEPD) (www.aepd.es).

11. Security measures

Cabrera Kapital applies the technical and organisational measures necessary to guarantee the security, confidentiality and integrity of the personal data processed, preventing their alteration, loss or unauthorised access.

12. Accuracy of data

The client guarantees that the data provided are true, accurate and up to date.

The omission or inaccuracy of relevant information may affect the outcome of the financial assessment.

13. Changes

Cabrera Kapital reserves the right to amend this Privacy Policy to adapt it to new legislation or changes in its activity.