

Privacy Policy

Your privacy is important to us. We recommend that you spend a few minutes reading, understanding and, where applicable, accepting our Privacy Policy.

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1. Who is the data controller?

Tendam Retail, S.A. (hereinafter, TENDAM) - Tax ID: A08099459.

Avenida del Llano Castellano, 51 - Madrid, Spain.
900 37 33 07

DPO: dpo@tendam.es

2. Which of your data do we process?

2.1. Details provided by the interested party:

TENDAM can collect personal data that gives us information directly through the various forms established. When you register as a customer or make a purchase, your personal data, as well as the transactions carried out and ongoing are stored in our information systems. You can change all the details at any time in the user control panel.

You can check how one of the fields is marked as compulsory on these forms, which means that without this information we will not be able to provide you with the requested service. These details are strictly necessary to process your order. Generally, they are: full name, delivery address (type of street, street name, door, staircase, city, province, post code, country), telephone number, contact email, and DNI (National ID) only in the case of delivery to the Canary Islands, Ceuta and Melilla due to tax requirement. If you request a legal invoice, your tax details will be required so that we can issue it.

TENDAM customers provide the data voluntarily when they register through the website or app. A user profile will then be created, the purpose of which is to manage the order formulated by you as a customer. The creation of these user profiles is necessary for the correct development of the commercial relationship between TENDAM and the customer.

Additionally, the development of our relationship generates information such as transactional data (for example, information provided to us about your purchase receipts, orders, refunds, etc.), connection and browsing data through the different web pages or apps, claims history and incidents. TENDAM processes this information at a statistical level with the aim of analysing the services it provides to its customers.

TENDAM is present, through its brands, on social networks and in addition to these, makes it easier for users to communicate through different social media channels. The processing of the data of the persons who follow, establish a link or relate to TENDAM through the social networks or media available to them will be governed by the legal notice on our website or app and the terms and conditions of use, privacy policies and regulations for access, use and similar of the corresponding social network or media. The user is aware of these and will have previously accepted them.

Finally, and only if you authorise us to do so, we can process your truncated card number (i.e. partially encrypted) to remember your payment method and to make the purchase process easier. To ensure your payment information is kept secure, we will never hold your full card number.

Apps owned by TENDAM include embedded content from the corresponding brand's website. For example, the Cortefiel app will include embedded data from the cortefiel.com website (or the Women'ssecret app will include embedded data from the womensecret.com website, and so on). This content behaves in the same way as it would if the user had visited the website. This is why the website may collect data about you and monitor your interaction with embedded content if you have an account on the website and are logged in as such (you have logged in or identified yourself with your user account).

2.2. Data not consciously provided by the person concerned resulting from the application of algorithms (inferred data):

It is true that, increasingly, companies use data that have not been provided directly by data holders. These data, known as "inferred data" result from us applying algorithms to analyse a variety of data, including social media and purchasing records for profiling purposes. This may be done, for example, to learn about our customers' interest in certain products, shopping times, tastes, shopping history, promotions used, satisfaction surveys, information on calls to our Customer Service Centre, browsing the TENDAM websites or apps, etc. You can obtain further information on this in the following section of the Privacy Policy that details the purposes of the processing.

3. For what purpose and legitimisation do we process your data?

The following table details the different purposes for which your data may be processed, depending on the relationship you maintain with TENDAM and its legal bases:

3.1. For the correct management of the commercial and contractual relationship.

Your data will be processed to provide the requested service, which, among other activities, may involve: (i) your customer registration; (ii) order preparation and delivery management through any of the available channels; (iii) to process and answer your queries, queries or claims. Failure to accept this purpose will mean that we cannot subscribe to the contract(s) to provide you with the services you are interested in.

To learn more about the contracts:

[Cortefiel Online Store Agreement Terms and Conditions](#)
[Online Store Terms and Conditions Agreement Pedro del Hierro](#)
[Online Store Terms and Conditions Agreement Springfield](#)
[Online Store Terms and Conditions Agreement Women'ssecret](#)
[Online Store Terms and Conditions Agreement Online Fifty](#)
[Online Store Terms and Conditions Agreement Hoss Intropia](#)

Legal Basis

Contract execution

Data category

Identification and contact details;
Transactions of goods and services;
Data derived from the use of the service.

3.2. Send you commercial information on Products and Services of our Brands, as well as Products and Services of other brands manufactured and/or marketed by TENDAM.

Whenever you request it through the boxes enabled on the different forms, we will send you commercial information on the offers, promotions and discounts of the TENDAM group of brands. We may also send you information about products or services owned by third parties, with whom TENDAM has agreements in place for distribution or production under licence. This information will be sent by the various means of contact (electronic and non-electronic): mobile phone (SMS, RCS), amongst others.

Legal Basis

Consent

Data category

Identification and contact details;
Data derived from the use of the service.

3.3. Profiling

3.3 Profiling

This purpose allows TENDAM to collect and process data on browsing and purchasing (amounts, order frequency, details of physical stores visited and/or online store, etc), whether you benefit from being a member of one or more of our clubs, your interests and preferences. This information enables TENDAM to offer you products and services that may interest you, and not others.

The processing of data for profiling purposes is based on the legitimate interest of TENDAM. To this end, TENDAM has weighted the interests and rights of the interested parties, and the measures taken by the person responsible to comply with their general obligations in terms of proportionality and transparency, and has concluded that:

1. The impact on people's fundamental rights and public freedoms is limited;
2. Such processing can be reasonably foreseen by the interested party who is interested in receiving personalised offers or, on the contrary, does not wish to receive generic advertising;
3. The processing of data for the above purposes does not result in exclusion, discrimination, defamation, or situations that jeopardise the reputation of the interested party and/or the power of negotiation.

The purpose of the analysis will be to identify which products and services are more closely related to different user groups that share common features (e.g.: age) or similar purchasing habits (e.g.: dates on which they usually shop). You can request additional information on how we have valued our legitimate interest and your own interests by contacting us under the terms set out in section 8 of this Privacy Policy.

Legal Basis

Legitimate interest in order to improve the service and offer the most accurate products to our customers. You can exercise your right of opposition under the terms set out in section 7 of this Privacy Policy.

Data category

Identification and contact details;
Personal characteristics;
Transactions of goods and services;
Data derived from the use of the service.

3.4. Answer your request for information about the nearest store based on geolocation.

The geographic location is disabled by default. Only in cases where you request, with the user's consent, information about our nearest store will be activated to respond to the request sent. Browsing with geographical location activated is the customer's choice, but if consent is withdrawn for location data, the website or app will not be able to offer you location-based functionalities. Under no circumstances will the website or app monitor the user's location continuously. The personal data provided will not be stored once the information request has been answered.

Legal Basis

Consent

Data category

Identification and contact details;
Geolocation.

3.5. Web or app browsing management and analysis

Managing the user's web or app browsing. We process the information to allow and facilitate access and browsing through our digital means. For example, to offer you the version of the website or app that best suits the device you use to enter our website or app, or your language, among others. Furthermore, prior to your consent, we will carry out navigation analyses in order to adapt to your needs. You can consult our Cookie Policy [here](#).

Legal Basis

Legitimate interest in guaranteeing the operation and security of management as a customer/user (technical and essential cookies) and consent of the data subject (optional cookies). **Data category** Identification and contact details;
Personal characteristics;
Transactions of goods and services;
Data derived from the use of the service.

3.6. Compliance with legal obligations.

TENDAM is subject to different regulations that involve the need to process personal data to comply with them. (E.g.: tax regulations). In compliance with these obligations, TENDAM may communicate your data to the Public Administrations or competent Courts, provided that the request is made through the established legal channels.

Legal Basis

Legal obligation

Data category

Identification and contact details;
Personal characteristics;
Transactions of goods and services;
Data derived from the use of the service.

3.7 Satisfaction surveys

Sending surveys via electronic means to users who have purchased anything from any of the TENDAM brands and learning the users' opinions about the products for improvement purposes. Your data will be added in statistical form, and any personal data related to the survey responses will be erased.

Legal basis

Legitimate interest in finding out how satisfied users are about products via email. TENDAM has carefully considered its legitimate interests versus users' rights and freedoms. You can obtain further information on this exercise via email to dpo@tendam.es.

Data category

Identification and contact details;

Transactions of goods and services;

Data derived from the use of the service.

4. How can I stop receiving commercial offers?

In all commercial communications sent to you by electronic means, a link will be enabled - UNSUBSCRIBE or similar - which will allow you to manage your privacy and request that we not send you any new commercial communications. You can also revoke your consent or express your opposition by any of the following means:

- - Via email to [**dpo@tendam.es**](mailto:dpo@tendam.es). In this case, it must be sent from the same email address used to create the user account.
- - Managing your privacy options through the **MY ACCOUNT** section for users who have registered their account on one of our websites or who are members of one of our loyalty clubs.
- - By post addressed to TENDAM RETAIL S.A., A/A DPO, Avda. del Llano Castellano 51, 28034 Madrid, Spain.

We will try to process the request as quickly as possible, but you may still receive some commercial communications for a while.

5. How long do we store your data?

If you have registered as a customer on our website or app, your personal data will be retained unless you unsubscribe, as we consider that in the meantime you wish to keep your account regardless of whether your activity as a customer is disrupted for a period of time. If you have not registered as a customer, but you make an online purchase, your details will be kept until you confirm that the order has been delivered without incident and that there are no claims.

Once you request cancellation or confirm that the order has been delivered without incident and that there are no claims, your data will be deleted according to the data protection regulations which means blocking the data, being available only at the request of judges and courts, the tax authorities or the competent public administrations during the limitation periods of the actions that may arise, to be subsequently eliminated.

The limitation periods vary depending on the type of service, for example, the limitation period for most personal civil actions is generally five years.

6. Will we share your data with third parties?

To fulfil the purposes described in this Privacy Policy, we must communicate your personal data to the following entities according to the legal basis that supports this communication:

Based on the **execution of the contract**, your payment details are collected by the financial institution or the gateway that manages the collection.

To comply with the applicable legal obligations, we may communicate your data to:

- Competent Courts or Tribunals, provided that the request is made through the established legal channels.
- Tax Agency and other competent authorities, for the fulfilment of legal obligations of any kind.
- Security forces and bodies as part of an ongoing investigation.

To fulfil our legitimate interest in maintaining centralised customer management, we will be able to communicate your data to other entities of the TENDAM Group <https://www.tendam.es/nuestras-companias/> (Spanish version) and <https://www.tendam.es/en/our-companies/> (version in other languages) for internal administrative purposes. You can request additional information on how we have valued our legitimate interest and your own interests by contacting us under the terms set out in section 8 of this Privacy Policy. You can exercise your right of opposition under the terms set out in section 7 of this Privacy Policy.

We provide our services with the support of different suppliers acting under our instructions as "data processors". Some of these data processors may be located outside the European Economic Area, with an international data transfer taking place in this regard. In this case, TENDAM will cover this transfer in any of the guarantees established in the applicable regulations. You can obtain more information about our processing managers and the details regarding international transfers by contacting us on the terms set out in section 8 of this Privacy Policy.

7. What are your rights when you provide us with your data?

Read and know your rights. If you have any queries, please contact us via email at: dpo@tendam.es

Your rights against TENDAM due to the processing of personal data are as follows: the right to access your personal data, rectify inaccurate data, request its deletion, limit any processing or oppose any use (e.g. subsequently opposing the sending of advertising), as well as not being the subject of decisions based solely on the automated processing of your data or porting your data. To exercise your rights, please email: dpo@tendam.es or send a letter to TENDAM RETAIL S.A., A/A DPO, Avda. del Llano Castellano nº 51, (28034 Madrid). You also have the right to file a claim with the Supervisory Data Protection Body.

Right of access	You will have the right to obtain from TENDAM confirmation of whether or not we are processing personal data that concern you, in addition to information on: the purpose of the data processing; the categories of the data being processed; the recipients or the categories of recipients to which they have communicated or will be communicated; if possible, the expected time limit for the personal data to be stored or, if not possible, the criteria used to determine this period. In these cases, TENDAM will provide you with a copy of the personal data subject to processing. Furthermore, when requested by electronic means, the information will be provided in a common electronic format.
Right to rectification	You have the right to ask TENDAM to rectify personal data, without undue delay, when inaccurate or when incomplete. If you are registered on our platform, it may be easier to correct them directly by modifying the profile.
Right of erasure/right to be forgotten	You have the right to request that TENDAM erase any personal data, without undue delay, concerning you in the event of the following circumstances:

	<ol style="list-style-type: none"> 1. they are not necessary in relation to the purposes for which they were collected or processed; 2. that you withdraw consent and processing is not based on another legal basis; 3. that you oppose the processing and that no other legitimate grounds for treatment prevail; 4. that have been processed unlawfully. 5. That data must be erased to comply with a legal obligation established in Union/Member States Law applying to the data controller. 6. That personal data has been obtained in relation to the information society's service offering. <p>Where the deletion derives from the exercise of the right to oppose for direct marketing purposes, TENDAM may retain your identifying data in order to prevent future processing for these purposes.</p> <p>When TENDAM has made the personal data public and is obliged to delete such data, TENDAM, taking into account the available technology and the cost of its application, shall adopt reasonable measures, including technical measures, with a view to informing those responsible that are processing your personal data request for the deletion of any link to these personal data, or any other copy or replica thereof.</p>
<p>Right to restrict processing</p>	<p>You will be entitled to obtain from TENDAM the restriction of processing your data in the following circumstances:</p> <ol style="list-style-type: none"> 1. When you have challenged the accuracy of your personal data during the period enabling TENDAM to verify their accuracy; 2. If you consider that the data has been unlawfully processed and Tendam was opposed to the deletion of personal data and you request instead to limit its use; 3. That TENDAM no longer requires the personal data for the purposes of processing, but you need them for the formulation, exercise or defence of claims; 4. If you have objected to the processing, for the period required to check whether the legitimate reasons of TENDAM prevail over yours. <p>When you have obtained the processing restriction in accordance with this section, you will be informed by TENDAM before the lifting of this limitation. TENDAM will communicate any rectification or deletion of personal data or restriction of processing to each of the recipients to whom the personal data has been communicated, unless it is impossible or requires a disproportionate effort. TENDAM will inform the interested party about these recipients, if you request it.</p>
<p>Right to portability</p>	<p>You have right to receive any personal information concerning you, which you have provided to TENDAM, in a structured, commonly usable, machine-readable format, as well as the right for us to send it to another person responsible for processing when the processing is based on consent or a contract, and it is carried out by automated means.</p> <p>When exercising your right to the portability of data, you will have the right for personal data to be sent from one person responsible for processing to another, where this is technically possible. The exercise of this right will be accepted without prejudice to the powers granted by the right to deletion.</p> <p>The right to portability shall not apply to processing required to fulfil a task in the public interest or in the exercise of public powers conferred on TENDAM. The</p>

	right to portability shall not extend to information TENDAM may have inferred from data deriving directly from TENDAM's use of the services rendered.
Right to object	<p>You have the right to oppose the processing of data concerning you, at any time, including for profiling purposes. In the event that you exercise this right, TENDAM will stop processing your personal data, unless we have compelling legal reasons where processing takes precedence over your interests, rights, and liberties; or to formulate, exercise, or defend any claims.</p> <p>Where the processing of personal data is for the purpose of direct marketing, you will have the right to oppose at all times the processing of personal data that concerns you, including the creation of profiles to the extent that it is related to the aforementioned marketing strategy. So, personal data will no longer be processed for these purposes.</p>
Right to withdraw your consent.	You can withdraw your consent at any time. Your withdrawal will not affect the legality of the processing based on consent before its withdrawal. Withdrawing your consent will be as simple as granting it.
Right to file a claim	You have the right to file a claim with the Control Authority, especially when you have not obtained satisfaction in exercising your rights.

In cases where manifestly unfounded or excessive requests are made, especially for repeat requests, TENDAM may charge a fee that compensates the administrative costs of meeting the request, which will correspond to the real cost of processing the application.

TENDAM will inform you of the actions arising from your request within one month (which can be extended by two more months in the case of particularly complex applications, an extension that we would notify you on within the first month). If TENDAM decides not to attend to a request, it will inform you of this and we will give you the reasons for the refusal within the timescale applicable.

8. Modifications and consultations.

Tendam reserves the right to modify its privacy policy in order to adapt it to new legislation, jurisprudence, or in accordance with its business judgment or practice. If the Privacy Policy is modified, we will communicate it to you through our website, app or any other means of communication, in order to ensure that you are informed of the new applicable privacy terms. If you continue to make use of the services available via this website or app after we have informed you of the changes introduced to our Privacy Policy, this will imply that you agree to the new terms, except for possible purposes of data processing for which your consent is required. For any questions or clarifications regarding our privacy policy, please contact us at: dpo@tendam.es.

9. Cookie policy

You can consult our full Cookie Policy [here](#)