

In this resolution, the mentions of the affected entity have been hidden in order to comply with art. 17.2 of Law 32/2010, given that in case of revealing the name of the affected entity, the physical persons affected could also be identified.

File identification

Resolution of sanctioning procedure no. PS 34/2021, referring to the City Council (...).

Background

1. On 12/30/2020, the Catalan Data Protection Authority received a letter from a person who filed a complaint against the City Council (...), on the grounds of an alleged breach of the regulations on personal data protection.

The complainant explained that together with a group of 20 residents he presented an instance to the City Council in which we asked for a reduction in the IBI tax rate.

That the City Council responded to the request by publishing a Mayor's Decree on the e-Notice Board of the electronic headquarters.

The complainant complained that the published Decree contained personal data, specifically, names and surnames and cadastral values of the estates, as well as the amounts collected in terms of IBI.

He also provided several screenshots of the City Council's website, relating to the "List of displayed advertisements" section of the City Council's electronic notice board. First of all, it stated: "Response to allegations about increase in cadastral value in the area of the UA1 (...)" and under the title the following sentence: "It is made public so that all residents can have access to the response to the complaint presented to the City Council (...) regarding the new cadastral assessment (partial regularization in the UA1)". Other relevant data was the exposure period of the advertisement which was from 29/12/2020 to 1/03/2021. And in the "References" section there were the following documents in PDF format: "Complaint about IBI increase and new UA1 cadastral assessment (...)", "Sol Correction of IBI tax rate and Complaint about new UA1 cadastral assessment (...)".

According to the documentation provided by the complainant, the content of the Mayor's Decree was as follows:

"Given the allegations presented to the City Council by several residents of the UA1 (...):

Mrs. (...) and 24 more signatures

(Exposition of the complaint)

Mr. (...):

(Exposition of the complaint and the request addressed to the City Council)

The City Council then responded to the allegations and attached a table containing the following records relating to 37 properties:

"Plot cadastre data (cadastral reference number); Cadastral Value 2020/ Cadastral Value 2021/ Increase/ Percentage of increase/ IBI Quota 2020/ IBI Quota 2021/ Variation 2021/ % Variation".

They did not include the names and surnames of the owners of the estates or any other personal data, except for the names and surnames of the two people mentioned above.

2. The Authority opened a preliminary information phase (no. IP 411/2020), in accordance with the provisions of article 7 of Decree 278/1993, of November 9, on the sanctioning procedure of application to the areas of competence of the Generalitat, and article 55.2 of Law 39/2015, of October 1, on the common administrative procedure of public administrations (henceforth, LPAC), to determine whether the facts were capable of motivating the initiation of a sanctioning procedure.

3. In this information phase, on 03/15/2021 the reported entity was required to report on the purpose of the treatment consisting of the publication on the City Council's notice board of the Mayor's Decree with personal data and the legal basis that in their opinion would justify said publication.

4. On 01/04/2021, the City Council responded to the aforementioned request through a letter in which it stated the following:

- "This file was initiated by several instances presented by the cadastral owners of Action Unit 1 (...) who expressed their dissatisfaction with the cadastral regularization that had been carried out by the Center for Cadastral Management and Tax Cooperation, depending of the Ministry of Finance. The City Council (...) was not the direct recipient of the complaint regarding this regularization in which it had had no intervention. But indirectly it did affect the City Council due to the fact that the interested parties alleged that this regularization, added to the increase in the IBI for 2020 that the City Council had approved, meant an increase of more than 400% of the quota to pay for the neighbors

- In the writings presented by the residents, the Cadastre notifications were not provided so that the City Council (...) could give an adequate response to the statements that were made. Of the two neighbors listed in the Mayor's Decree, ONLY the one has been made public

first and last name, but no other data that allows us to relate your personal information.
No ID, no cadastral reference, no nothing.

- However, it was difficult to be able to answer the neighbors without having exact data, so the Virtual Office of the Cadastre was consulted with free access by all citizens of Spain: the data contained in the Mayor's Decree are accessible free: CADASTRAL REFERENCE among others that were not included in the Mayor's Decree (<http://www.sedecatastro.gob.es/>). The rest are simple calculations with a spreadsheet available to everyone. No protected personal data has been made public in breach of data protection regulations.
- The Mayor's Decree was issued in exercise of the Mayor's powers and the City Council's tax powers (...). In addition, it was issued in response to the complaints presented by a group of residents, for which the two main interested parties were notified and part of it was published in the eTAULER in accordance with article 45.1 a) of the Law 39/2015, of October 2".

5. On 04/15/2021, also during this preliminary information phase, the Authority's Inspection Area verified via the Internet that the announcement "Response to allegations about cadastral value increase in the area of the UA1 (...)" was no longer published on the notice board of the City Council's electronic headquarters, nor were any of the other documents mentioned.

6. On 04/29/2021 and still within the framework of this preliminary information phase, the Authority again required the reported entity to:

- Specify the purpose of the publication of the Mayor's Decree.
- It justified the publication of the names and surnames of the two people who had been notified individually (...) and whom the entity identified as "the two main interested parties".
- Provide a copy of the instances presented by Mrs. (...) and 24 more signatures and by sir (...)

7. On 05/13/2021, the City Council responded to the aforementioned request through a letter in which it set out the following:

- That the publication of the Decree on the Board of the Municipal Electronic Headquarters was intended to notify a plurality of interested parties who adhered to a letter signed by Mrs. (...) and Mr. (...) on behalf of the rest of the interested parties.
- That the publication of the names of the two representatives (without any other personal data) was done so that the rest of the interested parties represented could identify the letters to which the City Council responded. If this minimal information had been omitted it would have been very difficult or impossible for the rest of those affected to know what was being answered.
- That there was an obvious reason of public interest to clarify the erroneous information that was stated in the documents and that caused a lot of discomfort to the residents.

Likewise, the City Council provided a copy of the required documents:

a) Application presented by 25 people:

Presented to the City Council on 11/18/2020.

"Illustrious Mr. Mayor of the City Council (...),

In the municipal fiscal ordinances in 2019 for the 2020 financial year, it was decided to raise the tax rate for urban estates from 0.45 to 1.1, which is the maximum coefficient allowed by law.

After the meeting that took place with all the residents of the municipality, it was made clear that the cadastral values of the properties would not change and therefore the resulting quota would not be penalized doubly.

(...)

To the surprise of the neighbors with properties located in the UA1 zone (...) this November we received a notification from the cadastre increasing the cadastral values approximately twice the current ones.

We consider even more in the current times this very abusive situation and even though

we will present the appropriate allegations to the cadastre and to the estates that we consider appropriate, we ask that this situation be corrected by the

council (...)

We hope that our requests will be heard and resolved as soon as possible and without a written response. If we don't get a response from you within eight days, we will continue with the procedures we think are appropriate to save our rights as neighbors.

Signed by:

First and last name:

IDENTITY CARD:

The letter contains the personal data of 25 people, specifically the handwritten signature, first and last name and ID number. It is not stated in the letter that Ms. (...) act on behalf of the other signatories.

b) Application submitted by Mr. (...) with Registration ID: (...) and date and time: 11/17/2020

Submitted and signed by a single applicant. They contain the applicant's data for notification purposes.

8. On 04/06/2021, the director of the Catalan Data Protection Authority agreed to initiate a disciplinary procedure against the City Council (...) for an alleged infringement provided for in article 83.5.a), in relation to article 5.1.a); both of Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, relating to the protection of natural persons with regard to the processing of personal data and the free movement thereof (hereinafter, RGPD). This initiation agreement was notified to the imputed entity on 06/07/2021.

9. In the initiation agreement, the accused entity was granted a period of 10 working days to formulate allegations and propose the practice of evidence that it considered appropriate to defend its interests.

10. On 29/06/2021, the City Council (...) made objections to the initiation agreement, which are addressed in section 2 of the legal foundations.

11. On 10/19/2021, the person instructing this procedure formulated a proposed resolution, for which it was proposed that the director of the Catalan Data Protection Authority admonish the City Council (...) as responsible for an infringement provided for in article 83.5.a) in relation to article 5.1.a).

This resolution proposal was notified on 19/10/2021 and a period of 10 days was granted to formulate allegations.

12. The deadline for submitting objections has passed and no objections have been submitted.

proven facts

On 12/29/2020, the City Council (...) published on the Board of the City Council's electronic headquarters a Decree of the mayor's office with personal data without meeting any of the conditions for legality of the treatment established in article 6 of Regulation (EU) 2016/679.

The aforementioned Decree was published in response to the complaints presented by several residents in relation to the increase in cadastral values and the increase in the IBI. Specifically, in response to two instances: one submitted and signed by a single applicant, which contained the applicant's data for notification purposes; the second instance was presented and signed by a group of residents, 25 in total, which contained the following information (name and surname, ID and signature of the 25 applicants).

The published Decree contained the first and last names of two people together with a table containing 37 records with the following information: land cadastre data (cadastral reference number); cadastral value 2020/ cadastral value 2021/ increase/ percentage of increase/ IBI quota 2020/ IBI quota 2021/ variation 2021/ % variation they presented. The documents were accessible to everyone, as there were no access restrictions and, moreover, they could be downloaded in pdf format. The aforementioned documents were kept on the Dashboard of the electronic headquarters from 12/29/2020 to 03/1/2021.

Fundamentals of law

1. The provisions of the LPAC, and article 15 of Decree 278/1993, according to the provisions of DT 2a of Law 32/2010, of October 1, of the Catalan Data Protection Authority. In accordance with articles 5 and 8 of Law 32/2010, the resolution of the sanctioning procedure corresponds to the director of the Catalan Data Protection Authority.

2. The accused entity has not made allegations in the resolution proposal, but it did so in the initiation agreement. Regarding this, it is considered appropriate to reiterate below the most relevant part of the motivated response of the instructing person to these allegations.

It is therefore appropriate, in the first place, to address these allegations of the imputed entity.

2.1. On the lack of legitimization of the Catalan Data Protection Authority.

In the 1st section of its statement of objections, the accused entity explained that no personal data of the complainant was published and for this reason the file should have been filed without further proceedings.

The City Council argued in its letter that: "instead of filing the procedure without any further procedure, which was what was required, (the Authority) determined that there was data from other people who could have been compromised: specifically the names and surnames of Ms. (...) and Mr. (...). None of these two people have reported to the City Council nor are they part of the investigated file. (...). For all this, not having denounced Ms. (...) nor Mr. (...) at the City Council (...), the ACPD is not authorized to initiate any proceedings for the protection of their personal rights as it is a very personal action that can only be prosecuted after a complaint by the affected parties and not by third parties". And he concludes: "the file is being archived by mistake at the beginning because no personal data of the reporting person has been affected".

However, this allegation cannot succeed because during the preliminary information phase it was proven that the City Council published a Mayor's Decree that contained the personal data (name and surname) of two people. And, as will be said later, publishing personal data without a legal basis that justifies it constitutes an infringement in the field of data protection contained in the RGPD.

The City Council questioned the legitimacy of the APDCAT to pursue data protection violations, if there is no prior complaint from the person affected by the data processing in question. In this regard, it should be remembered that the RGPD attributes to the control authorities a series of functions, among which, in general, the function of controlling the application of the RGPD and having it applied (article 57.1.a) of the RGPD). And in accordance with article 57 of the LOPDGDD:

"1. The autonomous authorities for the protection of personal data may exercise the functions and powers established in articles 57 and 58 of Regulation (EU) 2016/679, in accordance with the autonomous regulations, when they refer to: a) Treatments of those who are responsible the entities that are members of the public sector of the corresponding Autonomous Community or of the Local Entidades included in their territorial scope or who provide services through any form of direct or indirect management".

In addition, in order to enforce the provisions of the RGPD, Article 58 of the RGPD attributes to the control authorities: powers of investigation, corrections and authorization and consultation. Thus, in section 2 of the same article it is established that:

"2. Each control authority will have all the following corrective powers indicated below:
a) sanction any person responsible or in charge of the treatment with a warning when the planned treatment operations may infringe the provisions of this Regulation;

b) punish all persons responsible or in charge of the treatment with notice when the treatment operations have infringed the provisions of this Regulation;

c) order the person responsible or person in charge of the treatment to attend to requests for the exercise of the rights of the interested party under this Regulation;

d) order the person responsible or responsible for the treatment that the treatment operations are adjusted to the provisions of this Regulation, when applicable, in a certain way and within a specified time; (...).

And in accordance with article 5 of Law 32/2021 of October 1, on the Catalan Data Protection Authority, the functions of the Catalan Data Protection Authority are: "a)

Ensure compliance with current legislation on the protection of personal data. b) Resolve the guardianship claims made by the affected persons regarding the exercise of the rights of access, rectification, cancellation and opposition. (...) f) Require those responsible for the file or the treatment and those in charge of the treatment to adopt the necessary measures to adapt the treatment of the personal data subject to investigation to the legislation in force in the field of data protection of a personal nature and, where appropriate, order the cessation of treatments and the deletion of files. h) Respond to requests for information, complaints and denunciations. j) Exercise the power of inspection. k)

Exercise the sanctioning power over any type of file or treatment subject to data protection regulations, in the scope established in article 3".

In short, given that the main function of the control authorities, in this case the APDCAT, is to control the application of the RGPD and enforce it. Considering also that the APDCAT has the power to impose sanctions within the scope of its competences, and considering that article 83 of the RGPD typifies a series of offenses for violating certain precepts of the RGPD, among which the processing of personal data is found without having a legal basis to justify it, the APDCAT is legitimated to exercise the sanctioning power over any processing, within the scope of its competences, that violates the regulations for the protection of personal data.

It should be added that article 21.1 of Law 32/2010 establishes that: "Those responsible for files and personal data processing included within the scope of action of the Catalan Data Protection Authority and those in charge of the corresponding processing they remain subject to the sanctioning regime established by the state legislation on the protection of personal data. And article 22.2, provides that: "4. The reporting person has the right to be notified of the actions that result from their reporting, without prejudice to the rights that may correspond to them if they are also an interested party". Therefore, the reporting person may or may not be affected by the processing of their personal data. But, in any case, it is the Director of the APDCAT who has the power to decide whether or not to initiate a sanctioning procedure.

sense, they establish that article 69 in procedure article 58, both of the LOPD, can be initiated by agreement of the competent body on its own initiative or as a result of superior order, at the reasoned request of other bodies or by complaint.

According to the transcribed regulations, it is not necessary for the reporting person to be affected by the data processing. If the Authority considers that there are indications that a certain data processing may violate data protection regulations, it is authorized to initiate a disciplinary procedure.

Having settled the above, it is worth remembering that the exercise of the rights set out in articles 12 to 22 of the RGPD has a very personal nature and this may have confused the City Council when it says: "that it is a very personal action that can only be prosecuted after a complaint has been made by those affected and not from third parties". However, this is only applicable when the person submits a claim to the APDCAT for the neglect by the data controller of their data protection rights (access, rectification, opposition, etc.). In these cases, only the affected person can present the claim, either by himself or through a representative. This is how article 12 of the LOPDGD provides: "1. The rights recognized in the articles 15 to 22 of Regulation (EU) 2016/679, may be exercised directly or through a legal or voluntary representative. On the other hand, in the case we are dealing with the complainant

reported facts that were likely to violate the principles applicable to data processing.

2.2. On the public interest and the application of the exceptio veritatis principle.

Subsequently, the imputed entity cited reasons of public interest, specifically, clarifying to the population (...) the correct percentages of the increase in the IBI. In addition, it cites the principle of exceptio veritatis, in relation to the right to make public data that contradict erroneous and uncertain statements.

In relation to "exceptio veritatis", the RAE defines this principle as the faculty that corresponds to the defendant of a crime of slander to prove the reality of the fact that he has imputed to another person, being exempt from criminal liability. And according to the Diccionario panhispánico del español jurídico, in the civil and constitutional fields, it is defined as a material exception that can be opposed to a claim for compensation for defamation if the defendant proves that the facts of the allegedly defamatory story are true.

In its statement of objections, the City Council cited the aforementioned principle in relation to the right to make public the data that contradicts the statements made by the residents who presented the instances to the City Council. In this sense, the City Council can only make personal data public if it has a legal basis that justifies the data processing. In this particular case, the people who presented the instances complained of a 140% increase in the municipal tax rate compared to the previous year.

The City Council alleged that it made public the data that contradicted this data.

However, to contradict the data that, according to the City Council, were not correct, it was not necessary to publish personal data, it was enough to publish the percentage increase.

The City Council alleged that the complainant and other interested parties appeared in various media in relation to this issue and, therefore, that these people had made their personal data public. However, this allegation cannot succeed, because the Public Administrations must act in accordance with Law 39/2015, of October 1, on the common administrative procedure of the public administrations, in accordance with the requirements of validity and effectiveness of administrative acts and, in any case, people in their relations with public administrations have the right: "To the protection of personal data, and in particular to the security and confidentiality of the data contained in the files, systems and public administration applications (Article 13. h) LPAC).

At this point, the question focuses on analyzing whether the City Council had the legitimacy to publish the personal data of the affected natural persons.

2.3. On the legal basis applicable to the processing of data, the City Council cites article 45.1 a) of Law 39/2015, of October 2, on the common administrative procedure of public administrations (LPAC).

The City Council has alleged that it published the Decree for obvious reasons of public interest and considering that individual notification to three neighbors was not sufficient to guarantee notification to all interested parties. That it was published for a reasonable time in addition to the individual notification.

Therefore, the reasons alleged to justify the publication are two:

a) Reasons of public interest.

The City Council has invoked reasons of public interest for the publication of the Mayor's Decree. However, it has been questioned whether the publication of the names and surnames of the affected persons was necessary, given that the heading already clearly identified that the Decree referred to the file for the regularization of the cadastral values of the UA1 (...).

When publication is invoked for reasons of public interest, it is necessary to refer to transparency regulations, specifically to Law 19/2014, of December 29, on transparency, access to public information and good governance (hereafter, LTAIP). In this respect, it is appropriate to consider article 8 of the LTAIP, which collects the information subject to the transparency regime in the following terms: "1. The public administration, in application of the principle of transparency, must make public the information relating to: m) Any matter of public interest". And also article 10.1. f) which establishes: "Administrative acts, responsible statements and prior communications that may have an impact on the public domain or the management of public services, and those others in which reasons of special public interest advise." However, it is also worth remembering that article 10.3 of the same law provides that: "In the case of letters f, g, hi of section 1, the information must not include personal data or references."

Accordingly, it would not be justified to publish the Decree with personal data.

b) That individual notification to three neighbors was not sufficient to guarantee notification to all interested parties. In accordance with the City Council, Ms. (...) and to Mr. (...). And additionally it was published with the personal data of Ms. (...) and Mr. (...). for a reasonable time.

Regarding the purpose consisting in the notification of the administrative act (the Decree), a series of points must be made.

First of all, taking into account the title of the publication: "Response to allegations about increase in cadastral value in the area of the UA1 (...)" and, more specifically, to the sentence that follows the title: "It is made public by so that all residents can have access to the response to the complaint presented to the City Council (...) about the new cadastral assessment (partial regularization in the UA1)". It follows from this sentence that the purpose of the publication was not to notify the

people who filed the complaint, but to inform all the residents of the area, including the residents who did not file a complaint, who were also affected by the increases in the cadastral value.

But, even if, in a hypothetical case, the purpose of the publication had been to notify the interested parties, as we will see below, the publication would not meet the legally established requirements to be considered a valid notification.

The City Council alleged that article 45.1 of the LPAC establishes that: "1. The administrative acts must be published when the regulatory rules of each procedure establish it or when it is recommended by reasons of public interest appreciated by the competent body. In any case, administrative acts must be published, and this has the effects of notification in the following cases: a) When the act is addressed to an indeterminate plurality of people or when the Administration considers that the notification made to a single interested party is insufficient to guarantee notification to all, and in the latter case it is additional to the one made individually". In particular, it has considered that the individual notification made to Ms. (...) and to Mr. (...) is insufficient to guarantee notification to the other interested parties.

In addition, article 7 of the LPAC establishes that: "When several interested parties appear in a request, writing or communication, the actions that take place will be carried out with the representative or the interested party that they have expressly indicated, and, failing that, with whichever comes first".

In short, in accordance with the regulations transcribed, in this case:

The publication of the data of Mr. (...) would not be justified. As the City Council stated, this person had already been notified individually. In this case, the City Council did not have any legal basis to allow the publication of personal data.

As for Ms. (...), from the document provided by the City Council regarding the instance presented by 25 people, it has been established that Mrs. (...) he did not act as a representative of the rest of the people, but was the first person on a list of 25 people on which the details of all of them were recorded (name and surname, ID and signature). According to the City Council, the Decree was notified to Mrs. (...), but not to the rest of the people. And as provided in article 7 of the LPAC, when there is a plurality of interested parties in an application, the actions will be carried out with the representative or with the interested party that they have designated and, failing this, with what is written in it in the first place. In this case, according to the instance provided, there was no representative nor designated interested party, so the City Council notified the response to the request to Mrs. (...) which was listed first.

The City Council alleged that it decided to publish the name of Ms. (...) so that the rest of the applicants could identify the resolution that affected them and that if this information had been omitted it would have been very difficult or impossible for the rest of those affected to know what was being answered. But, as stated above, in the heading already

it was clearly identified that the Decree referred to the file of regularization of the cadastral values of the UA1 (...), without having to publish the personal data of Ms. (...) nor from any of the other signatories.

In any case, given the provisions of article 41.3 LPAC, the publication did not meet the requirements required for the notification to be valid. And it is also not understood that the City Council decided to publish the name and surname of the only person who had been notified individually and whose address was included in the request. That is why this claim cannot succeed.

3. In relation to the facts described in the proven facts section, relating to the principle of lawfulness of the processing of personal data, it is necessary to go to article 5.1.a), which provides that "The personal data will be: a) treated in a lawful, fair and transparent manner in relation to the interested party ("lawfulness, loyalty and transparency")".

During the processing of this procedure, the fact described in the proven facts section, which constitutes the offense provided for in article 83.5.a) of the RGPD, which typifies the violation of "a) the basic principles for treatment, including the conditions for consent pursuant to articles 5, 6, 7 and 9."

The conduct addressed here has been included as a very serious infraction in article 72.1.b) of the LOPDGDD, in the following form:

"b) The processing of personal data without meeting any of the conditions for legality of the processing established in article 6 of Regulation (EU) 2016/679."

4. Article 77.2 LOPDGDD provides that, in the case of infractions committed by those in charge or in charge listed in art. 77.1 LOPDGDD, the competent data protection authority:

"(...) must issue a resolution that sanctions them with a warning. The resolution must also establish the measures to be adopted so that the conduct ceases or the effects of the offense committed are corrected.

The resolution must be notified to the person in charge or in charge of the treatment, to the body to which it depends hierarchically, if applicable, and to those affected who have the status of interested party, if applicable."

In terms similar to the LOPDGDD, article 21.2 of Law 32/2010, determines the following:

"2. In the case of infractions committed in relation to publicly owned files, the director of the Catalan Data Protection Authority must

issue a resolution that declares the infringement and establishes the measures to be adopted to correct its effects. In addition, it can propose, where appropriate, the initiation of disciplinary actions in accordance with what is established by current legislation on the disciplinary regime for personnel in the service of public administrations. This resolution must be notified to the person responsible for the file or the treatment, to the person in charge of the treatment, if applicable, to the body to which they depend and to the affected persons, if any".

In this case, there is no need to require corrective measures, given that from 1/03/2021 the Decree with personal data has not been published on the City Council's electronic board.

For all this, I resolve:

1. Admonish the City Council (...) as responsible for an infringement provided for in article 83.5.a) in relation to article 5.1.a), both of the RGPD.

It is not necessary to require corrective measures to correct the effects of the infringement, in accordance with what has been set out in the 4th legal basis.

2. Notify this resolution to the City Council (...)

3. Communicate the resolution to the Ombudsman, in accordance with the provisions of article 77.5 of the LOPDGDD.

4. Order that this resolution be published on the Authority's website (apdcat.gencat.cat), in accordance with article 17 of Law 32/2010, of October 1.

Against this resolution, which puts an end to the administrative process in accordance with articles 26.2 of Law 32/2010, of October 1, of the Catalan Data Protection Authority, and 14.3 of Decree 48/2003, of February 20, by which the Statute of the Catalan Data Protection Agency is approved, the imputed entity can file, with discretion, an appeal for reinstatement before the director of the Catalan Data Protection Authority Data, within one month from the day after its notification, in accordance with what they provide

article 123 et seq. of the LPAC. You can also directly file an administrative contentious appeal before the administrative contentious courts, within two months from the day after its notification, in accordance with articles 8, 14 and 46 of Law 29/1998, of July 13, regulating the administrative contentious jurisdiction.

If the imputed entity expresses to the Authority its intention to file an administrative contentious appeal against the final administrative decision, the decision will be provisionally suspended in the terms provided for in article 90.3 of the LPAC.

Likewise, the imputed entity can file any other appeal it deems appropriate to defend its interests.

The director,

Machine Translated