

File identification

Resolution of sanctioning procedure no. PS 9/2022, referring to the Bellvitge Community Social Work Private Foundation.

Background

1. 12/25/2020 , the Catalan Data Protection Authority received a letter from a person filing a complaint against the Fundació Privada Obra Social Comunitaria Bellvitge (hereinafter, Fundació Oscobe), on the grounds of an alleged breach of the regulations on personal data protection . This first letter was supplemented by two subsequent ones dated 01/12/2021 and 01/18/2021.

The complainant ((...)) in his writings reported the following:

- a) That " *the file where the data is kept, such as bank accounts, DNIs , social card numbers and others, are not with the corresponding protection [in cardboard folders where anyone can access the documentation] Any person who enters there you can access it. There is no security filter of any kind. Sometimes the office is open and no one is there.*" From the content of the letter of complaint it is inferred that the person making the complaint refers to the Foundation's facilities at C/ Zona de Sant Medir in Girona (Sant Gregori).
- b) That "*neither do we have the relevant SEPA documents (single euro payments area) for which receipts are issued to certain customers"*
- c) That customers and suppliers are not informed that their data "*will form part of the Oscobe Foundation "*.
- d) That the data of a *company's employees "circulates through several companies without their consent"* since, according to the complainant, the software used by the Oscobe Foundation "*it is in the name of another company EJ Brot Serveis Integrals de Jardineria SLU [social insertion company belonging to the Oscobe Foundation (hereafter, EL BROT)], (...) at no time was it communicated to anyone, nor supplier companies, nor customers, nor workers whose data would be in a database of the company El Brot Serveis Integrals de Jardineria SL "*. And the complainant added that "*for example, I signed a contract with the Oscobe Foundation and my data was in the ERP (software) of El Brot Serveis Integrals de Jardineria SLU and the payroll was sent to me by Associació Coordinadora Sinergia Social. In other words, my data was in 3 entities, when I had only signed with 1"*.
- e) That "*the website <https://www.oscobe.com/> does not respect the cookie law of the European Union nor does it warn of the tracking that is done with google analytics (...) if you look at the code of the page you can see that the tracking script is there"*.
- f) That the Oscobe Foundation has not asked for the consent of the people at risk of social exclusion who work on projects of said Foundation, specifically in EL BROT, to photograph them and appear on social networks.

2. The Authority opened a preliminary information phase (no. IP 406/2021), in accordance with the provisions of article 7 of Decree 278/1993, of November 9, on the sanctioning procedure for application to 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 susceptible to motivate the initiation of a sanctioning procedure.

On 03/05/2021, as part of this preliminary information phase, the Authority's Inspection Area made a series of checks via the Internet. Thus, it was found that by accessing EL BROT's Facebook page - which can be accessed in open mode, without needing to be logged in - a series of photographs are shown in which images of people appear, but in attitudes and situations that do not allow us to unequivocally determine their link with the entity, as workers at risk of social exclusion.

3. Also in this information phase, on 05/03/2021 the reported entity was required to, among others, report on the following:

- a) The security measures implemented to prevent unauthorized third parties from accessing the personal data contained in non-automated files (paper format) for which the Oscobe Foundation is responsible for processing .
- b) If the Oscobe Foundation has clients or suppliers who are natural persons; and, if so, inform how your right to information regulated in article 13 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 circulation thereof (hereafter, RGPD)
- c) To confirm or deny the claims of the person making the complaint (see letter d/ antecedent 1) in relation to the communication of data of workers, clients and suppliers who are natural persons, between various entities linked to the Oscobe Foundation . If these statements are true, indicate the legal basis that would enable this communication of data.
- d) It indicated the legal basis that would enable the publication on the social networks of the company EL BROT of the Oscobe Foundation , of photographs showing people, according to the complainant, at risk of social exclusion who work on its projects.

4. On 03/16/2021, the Oscobe Foundation responded to the Authority's request through a letter stating the following:

- That the Oscobe Foundation has collected in the document "*Implementation of the General Data Protection Regulation (EU 2016/679, of May 25) and of the Organic Law on the Protection of Personal Data and guarantee of digital rights (3/2018, of December 5)*" the security measures that must be adopted in the processing of data by the entity, among which the following are contemplated: 1) "*that the files with personal data must be in dependencies to which there is no free access. These dependencies must have a locked door, or the affected files will be in locked cabinets ; 2) that " only the people with the functions of security managers are authorized to grant, alter or cancel authorized access to the data and resources, in accordance with the criteria established by the person in charge of the archive" ; 3) that " if there are personnel from outside the aforementioned entities (auditors, inspectors and others) who have access to the archives, they must be subject to the same security conditions and obligations as their own personnel"*; and, 4) other measures in relation to the functions and obligations of the staff.
- That "*the administrative offices of the Oscobe Foundation have offices equipped with doors with the required closure*" and that "*all the staff who provide services to the entity are aware of these regulations [in relation to the duties and obligations of the staff] and signs his commitment by signing the contract*".

- That the Oscobe Foundation has suppliers, natural persons who work as trainers for some of the entity's projects and who are informed of their rights and obligations regarding data protection regulations through the service provision contract which model attached
- That *"the Oscobe Foundation maintains a contract with the Associació Coordinadora Social Sinergia for the provision of services, in which it is established that the Oscobe Foundation is responsible for the treatment and the Associació Coordinadora Social Sinergia is in charge of treatment (attached the processing order contract).*
- That, the legal basis that would enable the publication on the social networks of the company EL BROT (of the Oscobe Foundation), of photographs of certain people is their consent. In this sense, *"as for the Oscobe Foundation , users sign a specific consent, where they can accept or not the use of their image for the entity's communication".* On the other hand, in the employment contract that these people sign with the company EL BROT - a standard contract from the Ministry of Labor - they are informed that they can *"make use of images in their communications"* .

The reported entity attached various documents to the written document, among others:

a) *"Service provision contract. In charge of the processing and responsible for the file"* , signed by the Oscobe Foundation and the Coordinating Association of Sinergia Social entities (hereafter SINERGIA), on 05/20/2018. The purpose of this contract, as specified in section 1, is to *"perform functions at the level of management, human resources management and accounting advice"* , and for this purpose the following information is made available to the person in charge (paragraph 2 of the contract): *"Management functions: accounting, fiscal, financial and organizational data are involved. Human resource management: personnel management and labor information. Accounting advice: entity's accounting information, customer/supplier data, public and private bodies"*.

This contract incorporates the terms provided for by article 28 of the RGPD.

"Teaching Services Provision Contract" model , which should be signed by the teaching person and the Oscobe Foundation .

It is noted that this form does not include all the points required by article 13 of the RGPD.

c) *"Consent form for users"* of the Oscobe Foundation , linked to the *"Program of active reintegration measures for people receiving the guaranteed income of citizenship (MAIS 2021)"* , regarding the processing of their data (among others, the image).

The same form contains a box - which must be checked - in which the user's consent is requested for *"the use of images for the communication of the service "*

It is noted that this form does not contain all the details required by article 13 of the RGPD.

5. On 04/17/2021 a new letter was received from the complainant in which he explained, in essence: a) that it could be that in certain banks there were accounts in the name of a former administrator of the entity EL BROT and that credit lines might be being applied for in this person's name; and, b) that in the letter that the entity had sent him, in which he responded to the request for access to his data that he had previously made, he was not informed that his data would have been transferred to EL BROT and SYNERGY.

6. On 12/05/2021, the complaint was transferred to the Spanish Data Protection Agency regarding the data storage and recovery devices in terminal equipment (cookies) through the website of the Oscobe Foundation , to the extent that these facts would not be included in the competence of the Catalan Data Protection Authority.

7. On 04/10/2021, the Oscobe Foundation was again requested to provide completed copies of the forms detailed in sections b) and) of the 5th precedent.

8. On 07/10/2021 the Oscobe Foundation responded to this last request by providing the following completed forms (partially anonymised):

a) *"Teaching services provision contract"* signed on 04/12/2021.

b) *"Consent form for users"* signed on 07/28/2021.

In addition to the previous forms that had been required, this additional one was provided:

c) *"Consent form for users (Image and video)"* of the Oscobe Foundation , signed on 04/06/2021, which informs about the *use of images and video for the communication of the service : Use of internal images and video to share with project participants. Use of image and video for internal communication to share and external (as memory, including the entity's website, social networks...)"* . The same form contains two boxes - which must be checked - in which the user's consent is requested for *"the use of images for the communication of the service "* and/or *"to publish the image/video/ interview as a participant in (entity identification)"*.

It is noted that this form does not contain all the details required by article 13 of the RGPD.

9. On 10/03/2022, the director of the Catalan Data Protection Authority agreed to initiate a disciplinary procedure against the Oscobe Foundation for an alleged violation provided for in article 83.5.b), in relation to article 13; both of the RGPD.

10. The initiation agreement explained the reasons why no imputation was made with respect to other facts reported.

In relation to the facts reported regarding the eventual violation of data security, the lack of consent for the dissemination of images of people at risk of social exclusion on social networks, and the maintenance as owner of 'a bank account of the Foundation of a person who would no longer provide services, was archived, based on the principle of presumption of innocence, given that there was no evidence or evidence to corroborate these facts.

In relation to the reported fact that the entity does not have the "SEPA" documents (according to information provided by the Bank of Spain on the page www.sepaesp.es, these documents are *"the means by which the debtor authorizes and consents to the creditor to: (a) start the collections by means of the charge in the account indicated by the debtor (b) authorize the debtor's entity to charge to its account the debts presented for collection by the creditor's banking entity"*, it was proceeded in its file to the extent that the eventual lack of these documents, would not amount to any infringement of those typified in the data protection regulations.

In relation to the reported event referring to the possible communication of data from employees -(...)- of the Oscobe Foundation to other companies (EL BROT and SINERGIA), without their consent and without having -informed them, their file was also processed, with regard to EL BROT based on the principle of presumption of innocence, and with regard to the SINERGIA company, as there is a treatment contract between the Foundation Oscobe and this company in accordance with what is required by article 28 of the RGPD, and in view of which the transfer of personal data from the Oscobe Foundation to SINERGIA would not constitute a communication of data in accordance with the provisions of the Article 4 (sections 9 and 10) of the RGPD.

11. 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.

12. On 03/28/2022, the Oscobe Foundation submitted a letter in which it did not question the facts attributed to the initiation agreement, nor its legal qualification, on the contrary, it recognized its responsibility in the said facts. In the same letter, the Oscobe Foundation detailed the measures it had taken in order to correct the effects of the infringement and prevent events such as those that had given rise to the present sanctioning procedure from occurring in the future; and he also enunciated those extenuating circumstances that in his opinion were present in the present case so that they would be taken into account when establishing the penalty to be imposed, which he understood should be a warning.

The accused entity provided various documentation with its letter, among others:

- New model of the "*Form for the contract for the provision of teaching services*".
- Copy of the letter that had been sent to the teachers in which they were provided with the information related to the conservation of their data, to the extent that in the document "*Contract for the provision of teaching services*" that at the time was I had made it easy for them, this end was not included.
- New model of the "*Consent form for users*" linked to the "*Program of active reintegration measures for people receiving the guaranteed citizenship income*".
- New model of the "*Consent form for users (image/video)*"

13. On 27/05/2022, the instructor of this procedure formulated a proposed resolution, by which she proposed that the director of the Catalan Data Protection Authority impose an administrative fine of 2,000 on the Oscobe Foundation euros (two thousand euros) as responsible for an infringement provided for in article 83.4.b) in relation to article 13, both of the RGPD.

This resolution proposal was notified on 31/05/2022 and a period of 10 days was granted to formulate allegations.

15. The entity has not submitted any objections to the proposed resolution within the time limit granted and on 03/06/2022 it paid in advance the amount of 1,200 euros (one thousand two hundred euros), corresponding to the monetary penalty proposed by the instructor in the resolution proposal, once the reductions provided for in article 85 of Law 39/2015 have been applied. At this point it should be remembered that in the letter of 03/28/2022 (document 12) the entity acknowledged its responsibility for the imputed facts.

proven facts

The Oscobe Foundation does not include all of the ends provided for in article 13 of the RGPD, in the documents indicated below, through which personal data is collected.

a) *"Teaching services provision contract"*

This document does not provide information on the retention period of the data or, failing that, the criteria used to determine this period (art. 13.2.a/ RGPD).

b) *"Consent form for users"* of the Oscobe Foundation , linked to the *"Program of active reintegration measures for people receiving the guaranteed income of citizenship (MAIS 2021)"* .

This form does not mention the right of the affected person to revoke their consent for the use of images, nor the right to submit a claim to the control authority (art. 13.2, sections c/ id/ RGPD) .

c) *"Consent form for users (Image and video)"*

This form does not mention the right of the affected person to revoke their consent for the use of images, nor the right to submit a claim to the control authority (art. 13.2, sections c/ id/ RGPD) . It also does not provide adequate information on the terms of data retention, since for this purpose it is limited to informing that said term *"is not established"*.

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 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. Despite being a private foundation, the reported data processing falls within the competence of the Authority under the provisions of article 156.b) of the Statute of Autonomy of Catalonia (EAC) and article 3.h) of Law 32/2010.

2. In accordance with article 85.3 of the LPAC, both the recognition of responsibility and the voluntary advanced payment of the proposed monetary penalty lead to the application of reductions. The effectiveness of these reductions is conditioned on the withdrawal or renunciation of any action or appeal through the administrative route against the sanction. For both cases, sections 1 and 2 of article 85 of the LPAC provide for the completion of the procedure.

As has been advanced in the antecedents, the imputed entity has not questioned the facts imputed in the initiation agreement, nor has it submitted allegations against the proposed resolution, and has taken both options for reduce the amount of the penalty, acknowledging his responsibility for the alleged acts and paying in advance the amount of the penalty

proposed by the instructor in the resolution proposal (with the corresponding reduction of 40%).

3. In relation to the facts described in the proven facts section, it is necessary to go to sections 1 and 2 of article 13 of the RGPD, which establish the information that must be provided when personal data is obtained of the person concerned:

"1. When personal data relating to an interested party is obtained, the data controller, at the time it is obtained, will provide all the information indicated below:

- a) the identity and contact details of the person in charge and, where appropriate, of their representative;*
- b) the contact details of the data protection officer, if applicable;*
- c) the purposes of the treatment for which the personal data is intended and the legal basis of the treatment;*
- d) when the treatment is based on article 6, section 1, letter f), the legitimate interests of the person in charge or of a third party;*
- e) the recipients or the categories of recipients of the personal data, as the case may be;*
- f) in its case, the intention of the person in charge to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or, in the case of the transfers indicated in articles 46 or 47 or article 49, section 1, second paragraph, refers to the adequate or appropriate guarantees and the means to obtain a copy of these or the fact that they have been provided.*

2. In addition to the information mentioned in section 1, the controller will provide the interested party, at the time the personal data is obtained, the following information necessary to guarantee a fair and transparent data processing:

- a) the period during which personal data will be kept or, when not possible, the criteria used to determine this period;*
- b) the existence of the right to request from the person responsible for the treatment access to the personal data relating to the interested party, and its rectification or deletion, or the limitation of its treatment, or to oppose the treatment, as well as the right to the portability of the data ;*
- c) when the treatment is based on article 6, section 1, letter a), or article 9, section 2, letter a), the existence of the right to withdraw consent at any time, without it affecting the legality treatment based on consent prior to its withdrawal;*
- d) the right to present a claim before a control authority;*
- e) if the communication of personal data is a legal or contractual requirement, or a necessary requirement to sign a contract, and if the interested party is obliged to provide personal data and is informed of the possible consequences of not providing such data;*
- f) the existence of automated decisions, including the creation of profiles, referred to in article 22, sections 1 and 4, and, at least in such cases, significant information on the logic applied, as well as the importance and expected consequences of said treatment for the person concerned."*

For its part, sections 1 and 2 of article 11 of Organic Law 3/2018, of December 5, on the protection of personal data and guarantee of digital rights (hereinafter, LOPDGDD), referring to transparency and information to the affected person, provide that:

"1. When the personal data is obtained from the affected person, the controller can comply with the duty of information established by Article 13 of Regulation (EU) 2016/679 by providing the affected person with the basic information referred to in section below and indicating an electronic address or other means that allows you to access the rest of the information in a simple and immediate way.

2. The basic information referred to in the previous section must contain, at least:

- a) The identity of the data controller and his representative, if applicable.*
- b) The purpose of the treatment.*
- c) The possibility of exercising the rights established by articles 15 to 22 of Regulation (EU) 2016/679.*

If the data obtained from the affected person must be processed for profiling, the basic information must also include this circumstance. In this case, the affected person must be informed of his right to object to the adoption of automated individual decisions that produce legal effects on him or significantly affect him in a similar way, when this right is given in accordance with the provisions of article 22 of Regulation (EU) 2016/679."

During the processing of this procedure, the facts described in the proven facts section, relating to the lack of certain points in the information clause provided in the documents provided to the people from whom their information was collected, have been duly proven data, which are considered constitutive of the infringement provided for in article 83.5.b) of the RGPD, which typifies as such the violation of *"the rights of the interested parties pursuant to articles 12 to 22"*, among which there is the right of information provided for in article 13 of the RGPD.

4. Since the Oscobe Foundation does not fit into any of the subjects provided for in article 77.1 of the LODGDD, as it is a private foundation not registered in the Public Sector Registry of the Generalitat of Catalonia, it results from application of the general sanctioning regime provided for in article 83 of the RGPD.

Article 83.4 of the RGPD provides for the infractions provided for there, to be sanctioned with an administrative fine of 10,000,000 euros at most, or in the case of a company, an amount equivalent to 2% as maximum of the overall total annual business volume of the previous financial year, opting for the higher amount. This, without prejudice to the fact that, as an additional or substitute, the measures provided for in clauses a) ah) ij) of Article 58.2 RGPD may be applied.

In the present case, as explained by the instructor in the resolution proposal, the possibility of replacing the administrative fine with the reprimand provided for in article 58.2.b) RGPD should be ruled out, given that, on the one hand, there were three forms that had missing information, and; on the other hand, that in two of them (those detailed in letters b/ and ic/ of the proven facts) relevant information was not provided to guarantee the exercise of rights recognized in the personal data protection regulations, such as the possibility to revoke consent and the right to file a claim with the supervisory authority.

Once it has been ruled out that the penalty of an administrative fine should be replaced by a warning, it is necessary to determine the amount of the administrative fine to be imposed. According to the provisions of article 83.2 of the RGPD, and also in accordance with the principle of proportionality enshrined in article 29 of Law 40/2015, as indicated by the instructor in the resolution proposal, the sanction should be imposed of 2,000 euros (two thousand euros). This quantification of the fine is based on the weighting between the aggravating and mitigating criteria indicated below.

As mitigating criteria, the concurrence of the following circumstances is observed:

- The lack of intentionality (art.83.2.b RGPD).
- The category of personal data affected by the infringement - there is no evidence that it affected special categories of data - (art.83.2.g RGPD).
- The lack of evidence of obtaining benefits as a result of the infringement (art. 83.2.k RGPD and 76.2.c LOPDGDD).
- The nature of the non-profit private Foundation entity - art. 3 of its Statutes - (art. 83.2.k RGPD and 76.2.c LOPDGDD).
- The immediate action by the entity in order to reduce the effects of the infringement and also to prevent it from happening again in the future. To this end, the entity has informed that it has provided the affected persons with a new form so that they are fully aware of all the points provided for in article 13 of the RGPD. Likewise, the entity has provided this Authority with these new adapted forms that include all the information detailed in the aforementioned precept (art. 83.2.c of the RGPD).

With regard to the analysis of the mitigating criteria that have been related and that are taken into consideration when setting the amount of the fines, it should be noted that most of them have been invoked by the Foundation . Conversely, this Authority cannot take into account other extenuating circumstances invoked by the entity:

- The number of people affected (15, 32 and 39 people, respectively, linked to each of the forms). In this regard, it must be said that, despite the fact that the number of people affected is not too numerous, it would have enough entity to not consider its consideration as a mitigating factor appropriate, although this circumstance will not be taken into account as an aggravating criterion either.
- That the affected persons are not minors. In this regard, it must be said that this element, in the case at hand, would not have the sufficient entity to justify its consideration as a mitigating criterion. In this regard, it must be noted that two of the analyzed forms could only be completed by adults (form a/ of proven facts addressed to teaching staff and form b/ addressed to people using the guaranteed income) .
- To have responded to all the Authority's requirements within the stipulated time limits. Nor can this circumstance be taken into account as a mitigating criterion, since it is the obligation of the entities that fall within the scope of action of this Authority to attend to its requirements and failure to do so may be constitutive of infringement

In contrast to the attenuating causes set out, the following criterion operates in an aggravating sense, and which has been taken into account to set the amount of the fine.

- Linking the activity of the Oscobe Foundation with the processing of personal data (art. 83.2.k of the RGPD and 76.2.b/ of the LOPDGDD).

5. On the other hand, in accordance with article 85.3 of the LPAC and as stated in the initiation agreement and also in the resolution proposal, if before the resolution of the sanctioning procedure the entity accused acknowledges his responsibility or makes voluntary payment of the pecuniary penalty, a 20% reduction should be applied on the amount of the provisionally quantified penalty. If the two aforementioned cases occur, the reduction is applied cumulatively (40%).

As has been advanced, the effectiveness of the aforementioned reductions is conditional on the withdrawal or renunciation of any action or appeal through the administrative route against the sanction (art. 85.3 of the LPAC, *in fine*).

Well, as indicated in the antecedents, by means of a letter dated 03/28/2022, the accused entity acknowledged its responsibility. Likewise, on 03/06/2022 he paid in advance the amount of 1,200 euros (one thousand two hundred euros), corresponding to the amount of the penalty resulting once the cumulative reduction of 40% has been applied.

6. Given the findings of the violations provided for in art. 83 of the RGPD in relation to files or treatments carried out by entities not included in article 77.1 of the LODGDD, article 21.3 of Law 32/2010, of October 1, of the Catalan Authority of Data Protection, empowers the director of the Authority so that the resolution declaring the infringement establishes the appropriate measures to stop or correct its effects. In the present case, however, according to the instructor's proposal, there is no need to require the adoption of any corrective measures since the entity has carried out a modification of the affected forms adapting them to the regulations. Likewise, the entity has also notified this Authority that it has provided the affected persons with the complete information required by Article 13 of the RGPD.

For all this, I resolve:

1. To impose on the Bellvitge Private Obra Social Comunitaria Foundation the sanction consisting of a fine of 2000 euros (two thousand euros), as responsible for an infringement provided for in article 83.4.b) in relation to article 13, 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 6th legal basis.

2. Declare that the Fundació Privada Obra Social Comunitaria Bellvitge has effected the advance payment of 1,200 euros (one thousand two hundred euros), which corresponds to the amount of the penalty imposed, once the percentage of deduction of 40% corresponding to the reductions provided for in article 85 of the LPAC.

3. Notify this resolution to the Bellvitge Community Community Private Foundation.

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 the provisions of 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,

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