

Full title of Code**Self-Regulatory Code for Children's Toy Advertising**

CAPIJ - Código de Autorregulación de la Publicidad Infantil de Juguetes

The 'Self-regulatory Code for Children's Toy Advertising' will enter into force on December 1, 2022 for all advertisements that are broadcast for the first time after that date. Advertising already issued before that date will have a period of one year to adapt to the new ethical provisions, until December 1, 2023.

INTRODUCTION

Minors, like all other citizens, have a right to be informed about products they are interested in. However, in comparative terms and given that they are vulnerable consumers (In accordance with the definition of Royal Decree-Law 1/2021, of January 19, on the protection of consumers and users in situations of social and economic vulnerability), constitute an audience of limited capacity to evaluate the information they receive; with a higher level of trust of and credulity granted to certain influential people; with greater sensitivity to aggressive commercial practices, and with a greater tendency to develop replicatory and imitative behaviours of those they see in the media.

In this context, it is important that parents, educators, the media, consumer associations, entertainment content providers, government bodies and advertisers encourage the development of the critical understanding of media messages, contributing to the promotion of responsible advertising.

This Code is set in the framework of the strategy for the protection of children that the Spanish Association of Toy Manufacturers (AEFJ) has been developing since 1993, and whose objective is to promote the right of toy companies to commercial communications and free competition, safeguarding the interests of children.

Almost three decades have elapsed since the AEFJ and UCE signed the first self-regulatory advertising code in Spain, the Code of Ethics for Advertising to Children (*e/ Código Deontológico para la Publicidad Infantil*), to which the following consumer associations subsequently signed up: ASGECO, ATR, AUC, CECU, FUCI, HISPACOOOP and UNAE. Application from the year 2003 was entrusted to the Spanish agency for advertising self-regulation, AUTOCONTROL. During this period there have been socio-cultural, technological and communicative changes that have had legal implications and a regulatory impact on the advertising and promotion of toys, which have required the updating of this document in 2010 and 2015 and now in 2021.

This Children's Toys Advertising Code is an updated compendium of the existing ethical standards that affect commercial communications aimed at children. In its provisions, the technological and economic evolutions of different media have been observed, which have resulted in changes in the content and design of messages and to the proliferation of new advertising formats in a multi-screen and omni-channel environment. It has also been recognised that as a form of public communication, advertising has significant cultural resonance in our society

Based on all of these assumptions, the AEFJ has initiated the development of this Sectoral Code (CAPIJ - *Código de Autorregulación de la Publicidad Infantil de Juguetes*), in order to establish a set of rules that will guide associated toy companies in the development, implementation and dissemination of their advertising messages aimed at children.

CAPIJ is in line with the principles of the 2018 ICC Advertising and Marketing

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Communications Code, the ICTI Code, Guiding principles for advertising and marketing communication to children and the guidelines established by the document 'Communicating Responsibly with Children and their Families in the EU' of the European Toy Federation (TIE).

In the first instance, companies adhering to this Code reaffirm – as expected – their commitment to respect general advertising legislation, as well as legal provisions concerning the protection of minors, regardless of the channel or media used to disseminate their advertising.

Likewise, member companies undertake to respect in their advertising aimed at children, the rules contained in this Code, whereby the scope of the legal obligations applicable to the advertising and promotion of toys aimed at children is made explicit and broadened, for the benefit of the general interest of consumers and the market.

SCOPE

The scope of this Code is restricted to the advertising of toys to children:

- A) The term “advertising” means any form of communication carried out by a public or private, natural or legal person in the exercise of a commercial, industrial, craft or professional activity, in order to promote, directly or indirectly the contracting of movable or immovable property/ goods, services, rights and obligations and influence consumer behavior.

Included in this definition, in addition to television advertising, are other techniques such as promotions or sponsorships, as well as direct marketing and digital advertising, and any form of communication disseminated directly by or on behalf of advertisers, generally in exchange for a payment or other consideration. The rules of this Code will not apply to the labeling or packaging of these products, which will be governed by the applicable legislation except when, due to their visibility, it is understood that they are part of the toys' commercial communications.

- B) “Advertising to children” for the purposes of this Code is that which is directed to or reaches an audience primarily made up of children under 15 years of age. However, in this group, two different age groups must be identified: under 7 years old and from 7 to under 15 years old, the first age group of those will require particular attention and caution, which consequently will be subject to stricter application of the criteria set out throughout this document.

An advertisement will be considered to be directed to children included in the age ranges referenced above, according mainly to the following criteria:

- i) The type of product being promoted: advertising directed to children up to 7 years old and under 15 years old is taken to mean advertising that objectively (*) promotes a product primarily intended for an audience of such an age range. (*) According to the product use data from sector-recognised systems.
 - ii) The design of the advertising: an advertisement shall be deemed to be directed to children under 7 and under 15 years of age when designed in such a way that the content, language and/or images are particularly suited to get the attention or interest of the audience of such ages.
 - iii) The circumstances in which the dissemination of the advertisement is carried out: advertising disseminated either in a medium or media objectively aimed primarily at the public of that age is considered to be directed at children under 7 years of age or under 15 years of age, or in a general media when it is inserted
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in time slots, programming blocks, sections or spaces aimed at children under 7 or under 15, or with a significant audience of under 7 or under 15. A significant audience will be understood as that audience (**) that exceeds by 15% the relative weight of minors in the total Spanish population.

(**) According to the data provided by the systems recognised by the sector for the estimation of audiences in the media and the Internet.

- C) Toys are understood to be those products designed or intended, exclusively or otherwise for use in play by children under 14 years of age. The products listed in Annex I shall not be regarded/ interpreted as toys, neither: electronic equipment, personal computers, game consoles used to access interactive software and their associated peripherals, unless the electronic equipment or the associated peripherals are specifically designed for and targeted at children and have a play value of their own, such as specially designed personal computers, keyboards, joysticks or steering wheels.

ETHICAL STANDARDS

I. Principle of legality

1. The advertising of toys to children shall comply with current legislation*, whatever its content, means of dissemination or form taken.

*The only definition of a toy at a legislative level within the framework of the European Union is established by Directive 2009/48/EC on the safety of toys, which defines them as: "products designed or intended, exclusively or otherwise, to be used for play by children under fourteen years of age".

Similarly, the advertising must be decent, honest and truthful, under the terms in which these principles have been developed by the AUTOCONTROL Advertising Code of Conduct, not being permitted to mislead about the characteristics of the products or about their safety, nor about the capacity and skills necessary to use them without causing harm to themselves or to third parties, nor may they use the image of girls in a discriminatory or humiliating manner.

II. Principle of fairness

2. The advertising of toys to children shall comply with the requirements of good faith and good business practices, whatever its content, the medium, or the form it takes.

III. The presentation of products

3. Special precautions shall be taken in the carrying out and dissemination of toy advertising directed at children in order to ensure that the written, audio and visual presentations do not mislead as to the characteristics of the product being promoted or its performance. Such characteristics can include certain features, whose number is not intended to be limited, on size, operation, colour, sound and durability.

4. The presentation of toys in advertising should not mislead about the supposed benefits that are not inherent to nor derived from their use. This includes, although the list is not exhaustive: the acquisition of strength, status, popularity, growth, ability and intelligence.

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5. Toy advertising must not mislead children by suggesting that the promoted product possesses particular characteristics, when all similar products have such characteristics.

6. The use of 'animated fiction'/ virtual reality must not mislead about the promoted products or their features or benefits.

Animated fiction will be understood as a representation using any computer graphics technique of an image similar to the promoted toy, or of a part or accessory thereof.

All necessary measures will be taken so that the ad as a whole accurately reflects the real benefits of the product, as well as its different elements and components. The presence of animated fiction will be indicated via the overlay or the relevant pictogram.

Specifically, the interaction of real and fictional animated images, or their juxtaposition without a clear differentiation that allows both types of images to be distinguished, will be avoided in advertisements.

Effects created to communicate or represent the characteristics or benefits of toys may be used to the extent that they are not misleading and allow children to know their true benefits and characteristics.

7. In those advertisements in which static toys are shown in motion, necessary precautions will need to be taken so that it is clearly evident that such movement is produced by the mechanical contribution of a hand or similar.

8. Toys that require assembly must state this characteristic. It will be understood that a toy requires assembly when its construction process is not conceived as the objective of the game or when it cannot be carried out by the children themselves, taking into account the toy's recommended age for usage. Likewise, in advertising for children's toys, it will be necessary to present the products with a clear and direct reference to their actual size. The guarantee to avoid misleading in such a way is to introduce a scene in the advertisement in which children appear, or at least a child's hand, playing with the promoted product.

9. The risk of misleading the consumer which can occur in each one of the situations mentioned above cannot be negated / offset by the mere introduction of an overlay (caption/ graphic) in which it is stated that this is an "animated fiction", or where applicable, drawing special attention to the actual size of the product (for example: "Doll size 20cm"; "*Tamaño de la muñeca 20 cm*"). Rather, the advertiser must take appropriate measures to ensure that all images and audio used in the advertisement are not likely to mislead the child audience in the sense set out above.

10. Toy advertisements aimed at children must avoid presentations that scare them or incite violence. Images or descriptions of explicit and detailed violence or aggressive presentations should not be used.

IV. Product information

11. The advertisements will clearly establish whether or not essential components for the use and enjoyment of the toy are included in the toy itself: for example, batteries or any other technological device.

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In the event that products from the same range or collection are presented in an advertisement, it will be clearly differentiated which elements or components belong to one or another toy.

In the event that toys, accessories or elements that are marketed separately are presented in an advertisement, it will be expressly stated that such toys, accessories or elements are sold separately.

12. The presentations and the use of the product must be shown or described in such a way that they can be replicated by the child for whom the product is intended, promoting creativity, problem-solving capacity, physical and/or intellectual development, sociability, or empathy.

13. In the event that it is necessary to offer any additional information in an advertisement for toys aimed at minors, this must be expressed in a language understandable to minors and in a clear, legible and prominent manner. To this end, a set of pictograms have been arranged, which are attached to this document, so that some of the characteristics of the advertisement, as well as the advertised toy, can be graphically expressed, facilitating their understanding.

If additional information is offered through an overlay, attention will be paid to the size of the lettering and its legibility, the contrast with the background, and, in the case of advertisements in audiovisual media, the time spent on the screen.

The pictograms may only be used by the toy companies who are signatories to this Self-Regulatory Code for Children's Toy Advertising.

14. Claims based on novelty may only be used when there is a relevant innovation in the product. Likewise, the term "new" may not be used in toys from previous campaigns.

V. Sales pressure

15. Toy advertising must not directly exhort children either to purchase the advertised product or encourage them to ask or persuade their parents or other people to purchase the products advertised. Neither should these advertisements suggest that a parent or adult who purchases a product for a child is better or more generous than one who does not, nor will the acquisition of the advertised product be related to the affection or social acceptance of the minor, or of the adult who buys it.

Similarly, the use of product placement in children's programmes is prohibited.

16. Toy advertising aimed at children must not pressure them to get the advertised product, nor create a feeling of urgency or exclusivity, nor use terms likely to generate such a feeling of urgency or exclusivity, such as "now - *ahora*" or "just/ only - *solo*".

17. Advertising must not give the impression that purchasing a product will provide minors with greater acceptance among peers, friends or family. And neither that not purchasing it will provoke rejection among the aforementioned. Advertising must not suggest that the purchase and use of the product will give the user the prestige, skills, or other special qualities of the characters featured in the advertisement.

18. Messages that directly encourage the compulsive accumulation of toys will be

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avoided.

19. Prices of the toys will be clearly and specifically reported through an overprint or the established pictograms when the PVP (*Precio de Venta al Público*) exceeds the following ranges: +€50, +100, +€150, +200 and +€300. In any case, the advertisements in which the price is indicated must comply with all the fundamental requirements of national legislation, in particular the regulations on consumer protection. Claims such as "only" (*solo*) or "no more than" (*nada más*) should not be used.

VI. Endorsement and promotion via personalities and programmes

20. Advertising of toys will not exploit the trust of minors in parents or teachers. Neither in characters that are popular among children, such as presenters or participants in television programmes, characters – real or fictional – from fiction films or series, characters from the sports or musical world, participants in talent shows, etc. These characters will not appear in toy advertising, with the exceptions detailed below. This is to prevent the presence or testimony of certain people or characters known and admired by minors in advertisements aimed at them from exerting an undue influence on them, in such a way that they may be driven to request the purchase of the advertised product not so much for its own characteristics, but for the simple fact of the testimony or endorsement (if any) of the character that appears in the advertising.

Notwithstanding the aforementioned prohibition, in the advertising of toys aimed at minors, characters that are popular among girls and boys may be shown - including scenes from children's programmes, movies or series in which said characters appear -, if the promoted toy bears a direct relationship with these characters or with a characteristic element of them. In particular, it will be considered that there is a direct relationship in the case of licensed toys, understood as those toys that incorporate in their commercial name the name of characters - real or fictional - that enjoy a high degree of popularity or prestige among minors. However, these characters will not be able to appear recommending the toy, implying that they like it, or interacting with it.

In any event, special care will be taken to prevent this type of character from creating false impressions about the characteristics of the toys or those who own them.

Telepromotions of toys will not be carried out. The aim is to prevent this type of advertising messages from exploiting the special trust of children in the presenters or fictional characters who participate in such programs, as well as preventing children from being able to confuse or not clearly distinguish between the advertising content and editorial or programming.

Notwithstanding the foregoing, popular characters that enjoy a high degree of appeal among children may appear in clearly differentiated educational spaces or "moments", whose purpose is specifically to promote healthy or civil habits among children. In these educational spaces, a singular reference to the name or logo of the company that promotes and sponsors said campaign may appear. Similarly, real or fictitious persons or characters who enjoy a high degree of popularity among children may participate in educational actions sponsored or promoted by toy companies whose purpose is specifically to promote healthy or civil habits among children. In these educational actions, a singular reference to the name or logo of the company that sponsors or promotes said campaign may appear.

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21. The advertising of toys disseminated through influencers will be governed by the provisions of the applicable legislation and from the "Code on the use of influencers in advertising" of the Spanish Association of Advertisers (AEA) and AUTOCONTROL, which is attached to this Code (*attached in the original Spanish version; separately available in English on the Wikiregs database*). However, for identification purposes, the provisions of rule 22 of this Code will be followed.

VII. Identification of advertising

22. Toy advertising aimed at children must be clearly separated from non-advertising content so that minors can clearly distinguish between the two

Advertisements must not refer to themselves as "programmes/ programas", "news flash/ avance informativo" or use situations, settings and styles that mislead about the advertising nature of the message.

Commercial communications that are not properly separated from programme content must be identified as such.

In the case of commercial communications from influencers, these must be identified as such in any case, including an explicit and immediate statement appropriate to the medium and message, about the advertising nature of said message. Regarding the way in which the identification must be carried out, this will be in accordance with the guidelines set out in the "Code on the use of influencers in advertising" of the Spanish Association of Advertisers (AEA) and AUTOCONTROL, for cases in which the advertising nature of the communications is not clear and obvious in view of the message or content itself. In accordance with those guidelines, generic indications such as "advertising", "publi", "in collaboration with" or "sponsored by", or alternatively descriptive depending on the specific collaboration in question may be used (for example, "Ambassador of [brand]", "Thanks to [brand]", "Gift from [brand]", "Sponsored trip", etc.).

VIII. Comparative Presentations

23. Comparative presentations must be shown in a way so that children clearly understand them, supported by adequate and valid substantiation. So, comparative advertising must provide real/ factual information. The comparisons must not misrepresent other products or earlier versions of the same products.

Toy advertising must respect the rules of fair competition, and specifically those that regulate comparative advertising and denigratory advertising.

IX. Promotions, draws, competitions and children's clubs

24. The advertising message that includes a promotion must be designed in such a way that, besides conveying the message's promotional incentive, it clearly shows the advertised product. The terms "gift - *de regalo*" or "Free - *gratis*" cannot be used when it is an item that is always included with the toy on sale or it is an indispensable accessory for performing the toy's principal function.

25. The essential conditions of promotional offers must be expressed in the advertising clearly and simply, so that they are easily legible and understandable for children and

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may not contain discriminatory or sexist elements.

26. Promotional draws included in toy adverts must not create unrealistic expectations on the chances of winning or about the prize that can be won. Therefore:

- 1) The prizes should be clearly indicated (stated/ defined), clearly setting out the number of prizes, the type of draw to be held, and the duration of the promotion etc.
- 2) Advertising should not be misleading as to the possibility of winning a prize.
- 3) The prizes awarded must be suitable for a younger audience.

27. In order to avoid misleading children, reference can only be made in toy advertising to children's clubs if the following requirements are met:

- 1) Interactivity: The child must perform some act that constitutes a deliberate joining of the club and receive something in return.
- 2) Continuity: A continuous/ on-going relationship must exist between the club and the child member, for example regular newsletters and activities.
- 3) Exclusivity: The benefits and activities derived from belonging to the club must be exclusive to their members and not merely the result of the purchase of a particular product.

X. Security

28. Advertisements or commercial communications must not depict adults or children in unsafe situations or in acts that are harmful to themselves or others. Thus, for example, when the advertising of toys includes scenes of sports activities such as cycling or skateboarding the people shown carrying out such activities must be provided with the appropriate safety equipment.

29. The commercial communication of toys must avoid scenes, images, or messages that encourage the dangerous or inappropriate use of the advertised product, especially in those cases in which the behaviour can be easily copied by children or when products are shown which are accessible to them.

30. Toy advertising must not encourage children to enter strange places or converse with strangers.

31. When minors are shown using toys, they must be appropriate for their age. For example, young children cannot be shown with toys that are only safe for older children.

32. Adults must be shown supervising children when the products or activities so require it.

33. Adults must always appear accompanying children in public places when the products or activities may endanger their safety.

XI. Education and civic values

34. Toy advertising to children shall not show under any circumstances sexual scenes, nor characterisation of minors with sexual connotation, or obscene language nor scenes that refer to addictive behaviour, or promote discrimination on any grounds: ethnicity, disability, gender...

35. As a general rule, toy advertising messages shall avoid showing gender bias in

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presentations that feature boys and girls, promoting a pluralistic and egalitarian image of the roles they can adopt, in order to support and facilitate their free choice of toys. The exclusive association of toys that reproduce roles of care, domestic work and personal beauty with girls will be avoided, as well as the exclusive identification of toys that promote experimentation, physical activity or technological development with boys. For these purposes, in commercial communications where several children appear, it will be avoided that they are of a single sex. Representations that offer a sexualised image of girls will also be avoided, preventing them from appearing dressed and made up as adult women and referred to as “sexy” or that evoke the mandate to be appreciated by the male sex.

36. In toy advertising, images that incite discrimination or humiliating treatment of minority groups will not be shown; images representing multiple profiles should always be attempted to be shown.

37. Toys will not be presented with the express or tacit suggestion that they are intended exclusively for children of one sex. Therefore, avoid identifying them with the label “for boys” or “for girls”. Likewise, the contrast in the same campaign, material, or commercial communication of specific colours or ranges of colours, traditionally assigned to one or another gender (pink vs. blue or pastel colours vs. dark colours) will be avoided. Nor will advertising be structured by classifying toys by sex. The infographics will promote diversity and gender equality and will endeavour to use inclusive language.

38. Toy advertising to children will not include images or situations that may encourage violence or bullying situations, regardless of their potentially humorous nature.

39. Toy advertising will endeavour to present positive role models, stimulating healthy, responsible and sustainable consumption, whenever possible. Advertisers are encouraged to incorporate diversity in advertising.

XII. Data Protection

40. Companies adhering to this Code undertake to comply with the legislation on personal data protection and privacy.

41. The data of minors under 14 years of age may not be processed without the express consent of the parents or guardians and, in this case, only with the scope determined by the holders of parental authority or guardianship.

The data of those over 14 years of age may be processed with their express consent, except in those cases where the law requires the assistance of the holders of parental authority or guardianship for its provision.

42. Under no circumstances may data be collected from the child regarding information about any other member of the family group or about its characteristics, such as data relating to the professional activity of the parents, financial information, sociological or any other such data, without the consent of the owners of such data. However, the identity and address data of the father, mother or guardian may be collected for the sole purpose of obtaining the authorisation provided for in the previous section. In the latter case, parents or guardians must be informed of the processing of their data in the manner and within the terms established in the data protection regulations.

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43. When processing relates to the data of minors, the information addressed to them shall be expressed in a language that is easily understandable by them.

44. It will be the responsibility of the person responsible for the processing to articulate the procedures that guarantee that the age of the minor and the authenticity of the consent given, where appropriate, by the parents or guardians, have been effectively verified, taking into account the available technology and means.

XIII. Advertising of Toys on the Internet, new technologies, new forms of advertising

45. Digital advertising, as well as hybrid forms of commercial communication and new forms of advertising, will be regulated by the same principles as advertising in general.

However, taking into account the special characteristics of these media, as well as their continuous evolution, the Monitoring Committee of this Code will adapt and develop specific obligations deriving from these principles to these media, particularly in relation to the presentation and information of products.

Meanwhile, in any event, advertisers must take special precautions in the carrying out and dissemination of toy advertising aimed at children under 15 years of age in these media and hybrid formulations, in order to ensure that the written, audio and visual presentations are not misleading about the characteristics of the product or its performance.

In general, any format must clearly indicate its commercial nature, and understanding that in these cases it is the child who makes the proactive decision to visit / view a brand, should encourage the supervision by adults, being unable to encourage the purchase of the product or service via verbal or other means. In all cases, the contents must be presented in an objective manner, without stereotypes, prejudices or violence.

46. In all cases, toy advertising to children in electronic distance/ remote communication must be clearly separated from content aimed solely at adults, preventing minors' access to such content through identification mechanisms.

Whenever apps or games are used for commercial communication, the recommended age of the recipient must be included. Where applicable, the classification used will be the one established by the self-regulatory codes intended for such purpose to which the advertiser is bound, or failing that, the PEGI Code (Pan European Game Information – PEGI).

47. Company web pages that incorporate e-commerce will follow the applicable legal framework for electronic commerce.

48. Companies adhering to this Code must establish mechanisms that ensure that when they collect personal data from children under 14 years of age online, they will obtain the consent of their parents or guardians.

a) Parents or guardians may object to the sending of advertising or information requested by the minors in their charge, both at the initial moment of data collection, and later by contacting the data controller through a system that ensures their identity.

b) In addition to respecting the option of the parents to limit the collection of such data online, the entities adhering to this code will limit the use of data provided by children

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for the sole purpose of promoting, selling, or delivering products or services aimed at minors.

c) Under no circumstances may data relating to children under 14 be transferred without the prior consent of their parents or guardians.

49. Companies adhering to this Code must offer parents or guardians information about how to protect the privacy of their child or ward online, as well as providing them with mechanisms for exercising their rights to access, correction, deletion, objection, restriction of processing, portability and, when the treatment is based on consent, the right to withdraw it at any time. Mechanisms must be established to control the user's age to prevent their free access to inappropriate content.

50. Companies adhering to this Code must support any effort made by other organisations to help inform parents or guardians of how to protect the privacy of their children or wards online, including information about access control tools and software for parents or guardians, which prevent minors under 14 from sharing their name, address and other personal data without their consent.

51. The sending of advertising to minors under 14 years of age by means of email messages or other equivalent means of individual communication by the advertiser will not be accepted when it has not been expressly requested or authorised by their father, mother or guardian.

The prior authorisation referred to above is considered to have been granted when, at the time data is collected, the adult has been properly informed of the possibility of being sent advertising through these means and has given their express consent. In particular, this consent is understood to have been obtained through a procedure of voluntary inclusion (opt-in) lists, though other practices guaranteeing the provision of consent in the terms established by data protection regulations are equally admissible.

If the sending of advertising has been authorised, a means must be offered, in any event, to oppose the processing of data for promotional purposes through a simple and free procedure, both at the time the data of minors is collected, and in each of the commercial communications addressed to them.

When the messages are sent via email, it must consist of the inclusion of an email address or other valid email address where it is possible to object to the processing of children's data. It is prohibited to send messages that do not include that address.

52. The sending of advertising for mobile devices (including mobile phones, portable game consoles, tablets and smart watches) to children under 14 years of age will not be accepted. In the case of minors of 14 years of age or older, the following rules will be observed:

The sending of advertising by SMS, WhatsApp or other types of instant messaging will require the specific consent of the minor. At the time of obtaining consent, you must be clearly informed of the identity of the advertiser, how to contact customer service, how to oppose these shipments (for example, sending a simple message such as "no publi"), the frequency of sending of the messages and the possible costs associated with the service; and all this without prejudice to also informing about any other aspect required by the applicable regulations and, in particular, the data protection regulations. Once consent is obtained, a confirmation message will be sent reiterating that information. As

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a general rule, the frequency of sending these messages should not exceed one message per week and will be made in the hours between 9:00 and 20:00 hours.

a) Push notifications in applications (apps) will require the express consent of the minor for this specific type of notification. This consent must be requested when downloading and installing the application. In addition, the application's configuration tool shall allow easy activation and deactivation of these notifications at any time.

b) When it is intended to carry out advertising based on geo-location data, at the time of obtaining the consent of the minor, it must be clearly explained to him/her how geo-location data is used for advertising purposes, how to deactivate geo-location on his/her device and how to oppose geo-location based advertising; and all this without prejudice to also informing about any other aspect required by the applicable regulations and, in particular, the data protection regulations.

53. When, in order to facilitate the minor's registration as a user, they are offered the possibility of using the identifier and password of a third party service (Google, Yahoo, Facebook, Twitter, etc.), they will be clearly informed of the information that will be shared between the platforms in case of using this option.

54. Profiling of children under 14 years of age for advertising purposes is unacceptable.

55. When there are premium rate services that go directly to the advertiser, or are provided in their name or interest, such services and their advertising must comply with the regulations that govern their use. Thus, the express consent of an adult will be required and the advertiser will establish the appropriate mechanisms to ensure this requirement. In all cases, the recipients will be informed of such costs before accessing the message or service, in a clear and legible manner, with formatting suitable for viewing, and must have a reasonable and sufficient period of time to be able to disconnect from the service without incurring charges.

56. Offers must be identified in such a way that the recipient can recognise them as offers. Under no circumstances will direct contractual offers (direct offers for sale/purchase) be sent to those under 18 years of age. The company will clearly inform of the terms and conditions of the offers and promotions, ensuring that they are easily identifiable and accessible for the user. When sales offers, sales discounts and/ or sales promotions are made, at the very least the user must be informed of the following:

- a) Previous and current price
- b) Discount percentage
- c) Term
- d) Terms and conditions of application.

57. Toy advertising to children in electronic distance communications media must respect the industrial and intellectual property rights of third parties other than the advertiser. In particular, on the Internet, introducing hidden names (meta names) that coincide with brands, labels, or the names of businesses or services over which use and ownership is not authorized.

58. Groups, children's online clubs, bulletin boards, forums, or chatrooms may not be used to send online advertising, except if in the latter case (chatrooms), in addition to meeting the other requirements set forth in this code, previous consent has been obtained from the moderator of the space; or, alternatively, from the service provider; or

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it complies with the rules for admission of advertising established for that group, forum, chatroom, or the like.

59. The advertising of toys on the Internet may not impede the free and normal browsing of the internet by children. In particular, the advertising messages received by a user while browsing a website must allow them to leave the advertising message at any time or remove it from their screen, in a clear and simple way, and return to the webpage of origin from which the user first accessed the advertising message.

60. Sponsorship shall mean any contribution made by a public or private entity to the financing of websites or other services provided via electronic distance communications media with the aim of promoting their name, brand, image, activities, or products. Websites or services sponsored by AEFJ members must comply with the following requirements:

a) Editorial content may not, under any circumstances, be influenced by the sponsor in any form that contravenes the editorial responsibility and editorial independence of the owner of the site or service.

b) They must be clearly identified as such, and include the name, logo, brand, services or other signs of the sponsor at the beginning (header/ top of webpage) or the end (footer/ bottom of webpage) of the website or service, or at both points.

c) The sponsor must also be identified by the above-mentioned means in the development of the sponsored site or service, albeit sporadically and without making it harder to follow.

61. Before accessing sites that allow the sharing of experiences between users, they must read and accept standards of conduct that must include, at least, the following principles:

a) Do not use foul language.

b) Do not make offensive comments or those that infringe personal dignity.

c) Do not carry out surreptitious advertising of products or services.

d) Do not encourage behaviours and/ or attitudes that transgress current legislation.

62. Toy advertising may only be carried out on social networks in which technical tools are provided which ensure on the one hand that children under 14 years of age can only access them with parental consent, and on the other, that ensure no public accessibility to the profiles of such children. If advertising specifically aimed at children under 14 years of age is carried out on social networks, they must ensure exclusive access to these children, restricting access to children over 14 years of age.

63. Websites promoting toys must comply with the obligations regarding the use of cookies under Article 22 of Law 34/2002 of 11 July on Information Society Services and Electronic Commerce, following its amendment by Royal Decree-Law 13/2012 of 30th March, and General Telecommunications Law 9/2014 of 9th May, or in any regulation that replaces it, as well as the data protection regulations in what affects the use of said technologies.

64. Warnings (or instructions/ advisories) which determine the decision to purchase the toy, such as those that specify the minimum and maximum age of the users, as well as

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other warnings contained in Annex V of Royal Decree 1205/2011, of 26th August, on the safety of toys, must be clearly visible and legible to the consumer before purchase on the online sales sites for toys, when so required under the provisions of Royal Decree 1205/2011, of 26 August, on the safety of toys.

APPLICABLE STANDARDS OF THE CODE

I. Link with the Code

1. Member companies of AEFJ that have expressly stated their adherence to the "Children's Toy Advertising Code" undertake to respect in their advertising the rules it contains.
 2. Adhering companies shall sign a document of commitment to this Code that reflects the undertaking, by the very fact of such adherence, to respect the Code's rules in their advertising activities, as well as to abide by and immediately comply with the content of the resolutions that the AUTOCONTROL Advertising Jury may issue to settle claims submitted in relation to this Code.
 3. The list of companies adhering to the Code herein and the composition of the Monitoring Committee will be made public.
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II. Code compliance administration

1. Prior consultation

1. In order to ensure the compliance of their advertising to this AEFJ Self-Regulatory Code, the companies adhering to it undertake to send all toy advertisements to the Self-Regulatory Technical Office for prior review through the consultation system or confidential and binding Copy Advice©. The Technical Office will respond to such queries within three business days of the request.
 2. Similarly, the companies adhering to this Code may send to the Autocontrol Technical Office, for prior examination through the prior consultation system or voluntary, confidential and non-binding Copy Advice©, any other advertising items aimed at minors, wherever there are doubts about their compliance with this Code. The Technical Office will respond to these queries within three business days of the request.
 3. Companies applying will provide Autocontrol's Technical Office with as much information regarding the advertising being examined as is required by the latter to carry out the prior consultation or Copy Advice©.
 4. In case of disagreement with the content of the prior consultation issued by the Autocontrol Technical Office, the advertiser may voluntarily request its review by the Jury, which in accordance with its Regulations and in view of the prior consultation issued by the Technical Office and the claims and documents provided by the advertiser, will decide the confirmation or repeal of its content. The decision of the Jury will always be binding. The section of the Jury that was aware of this review will refrain from participating in the procedure that would be followed before the Jury in the event that a claim is filed against the advertisement concerned.
 5. The companies adhering to the AEFJ Self-Regulation Code will not use advertising or the content of the prior consultation or Copy Advice© or the fact that it has been requested. However, they may present said prior consultations before the Courts of Justice, administrative authorities and the Autocontrol Jury in the event that disputes
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arise.

2. Subsequent control of compliance with the Code

The administration of compliance with the rules of the Code will be performed by the Autocontrol Advertising Jury in the first instance, which will deal with resolving any claims/ complaints related to the advertising of member companies that are presented to it with regard to transgression of the regulations of said Code.

2. In this regard, the companies adhering to the AEFJ Self-Regulatory Code undertake to register potential complaints against advertising of other affiliated companies in the first instance, and prior to bringing the case before Court, to the Advertising Jury, as well as to scrupulously and immediately observe and comply with the content of the decisions the Advertising Jury may issue in regard to the complaints related to the Code, either ceasing to advertise or applying the necessary amends.

2. Out-of-court settlement of claims and disputes

1. In addition to the companies that adhere to the Code, the following bodies may also file complaints before the Advertising Jury for infringement of the standards contained in the Code herein: AEFJ itself, consumer associations, Autocontrol, Public Administrations, any company or business or professional association and consumers themselves, as well as the Monitoring Committee, at its own initiative or the request of an individual consumer, or other persons, entities or groups not provided for in this regard.

2. To apply the Code effectively and to process and settle potential claims of infringement submitted by the adhered companies, the Autocontrol Advertising Jury will be governed by the principles of impartiality, transparency, independence, efficiency, legality, freedom of choice and consumers' right to representation established in Law 7/2017, of November 2, regarding the alternative resolution of consumer disputes, and will proceed according to the provisions of its Regulations. The Jury will settle the claims presented in view of the ethical standards contained in the AEFJ Self-Regulatory Code, explaining in each case whether or not there has been a transgression of the Code and its seriousness.

3. In its decisions, the Jury will determine which party or parties will be responsible for satisfying the administrative costs that result from processing the claim filed before Autocontrol. All the fees accrued before Autocontrol during the course of proceedings shall be imposed on the party that has seen all their claims rejected. If the acceptance or refusal is partial (i.e. decision is partially upheld), each party bears its own costs, while the fees and administrative costs mentioned above would be halved. Consumers, consumer associations, and the Monitoring Committee of the Code shall be exempt from payment of such fees and administrative costs, for whom the processing and resolution of claims raised will be free. For the adhering companies of this Code who are also members of Autocontrol, rates which to this end the Association has provided for its members will be applied to them.

4. Decisions issued by the Advertising Jury as a consequence of applying the Code will be immediately communicated to the interested parties for their compliance, as well as to AEFJ. Subsequently, the decisions will be published on the website or any other Autocontrol and AEFJ vehicle.

III. Monitoring Commission

1. Likewise, a Monitoring Commission of this Code is created, of mixed composition, which will be formed by a representative of the Ministry of Consumer Affairs, who will take the presidency of the Commission; three representatives of the Spanish Association

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of Toy Manufacturers (AEFJ); a representative of the National Commission of Markets and Competition (CNMC); a representative of the Spanish Association of Advertisers (AEA); four representatives of consumer and user associations registered in the national and/ or territorial State Register of Consumer and User Associations, and one representative of Autocontrol, with voice but no vote, who will perform the functions of Secretary of the Commission.

Appointments of Commission members will be made by the heads of each of the institutions that compose it.

As for the representatives of consumer and user associations registered in the State Registry of Consumer and User Associations, the Council of Consumers and Users will be asked to appoint them.

The Monitoring Commission will adopt its agreements according to the regulations contained in Law 39/2015, of October 1, of the Common Administrative Procedure of Public Administrations, which will be of supplementary application for what is not foreseen in the aforementioned clause.

2. The functions of the Monitoring Commission will be:

a) Periodically evaluate the application of the Code, in which a specific follow-up of article 35 regarding gender equality will be carried out, especially with respect to advertisements where only one person appears and which are, by definition, not mixed.

b) Make to the AEFJ the proposals for improvement and revision of the Code that it deems appropriate, and be aware of the code modification projects when the AEFJ makes its revision.

c) Periodically review the reports submitted by Autocontrol regarding compliance with the Code.

d) In all those cases in which it considers that there may have been a transgression of the Code's regulations, it may decide to put claims in front of the Autocontrol Advertising Jury.

3. Frequency of meetings

The Monitoring Committee will meet at least every six months, or when requested by one of the signatory parties.

The meetings of the Monitoring Commission will be held either in person, or through the appropriate telematic and/ or electronic means

ENTRY INTO FORCE

The 'Self-regulatory code for children's toy advertising' will enter into force on December 1, 2022 for all advertisements that are broadcast for the first time after that date. Announcements already issued before that date will have a period of one year to adapt to the new ethical provisions, until December 1, 2023.

LIST OF STANDARDS AND GUIDELINES ON WHICH THIS CODE IS BASED

Royal Legislative Decree 1/2007, of November 16, which approves the Consolidated Text of the General Law for the Protection of Consumers and Users and other complementary laws

1. Law 34/1988 of 11 November, on General Advertising
2. Act 3/1991, of 10 January, on Unfair Competition

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3. Organic Law 1/2004 of 28 December on comprehensive protection measures against gender-based violence
 4. Organic Law 3/2007 on effective equality between men and women
 5. Law 34/2002, of 11th July, on Information Society Services and E-Commerce (LSSICE)
 6. Law 7/2010, of 31st March, on audiovisual communication services
 7. Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data and which repeals Directive 95/46/EC (General Data Protection Regulation)
 8. Organic Law 3/2018, of December 5, on Personal Data Protection and digital rights guarantee
 9. Interpretative criteria document for TV advertising and minors
 10. Reports from the Monitoring Committee of Children's Advertising
 11. Resolutions from the Autocontrol Advertising Jury relating to Children's advertising
 12. Code of Co-regulation Code for advertising on food and beverages aimed at children, obesity prevention and health (Food and Beverages Advertising for children - PAOS Code)
 13. Self-regulation Code on Television Content and Children
 14. AEVI good practice guidelines on advertising interactive software products, modified in 2018
 15. The European codes of conduct related to advertising and children of the different national advertising self-regulation bodies integrated into the European Advertising Standards Alliance, EASA
 16. EACA Ethical Guidelines for Advertising and Children, 2002
 17. TIE, Communicating Responsibly with Children and their Families in the EU 2018
 18. The International Chamber of Commerce Advertising and Marketing Communications Code, 2018
 19. Statement on code interpretation ICC reference guide on advertising to children of the International Chamber of Commerce, 2016
 20. Confianza Online's Code of Ethics, modified in 2021
 21. The ICC Internet Marketing Code of April 2, 1998
 22. COPPA Children's Online Privacy Protection Rule, 2013
 23. Self-Regulatory Guidelines for Children's Advertising from the Children's Advertising Review Unit of the Council of Better Business Bureau (BBB)
 24. International Council of Toy Industries Code (ICTI)
 25. Code of Conduct on the use of influencers in advertising of the Spanish Association of Advertisers (AEA) – Autocontrol
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ANNEX I

LIST OF PRODUCTS THAT ARE NOT CONSIDERED AS TOYS WITHIN THE MEANING OF THIS CODE

1. Christmas decorations
 2. Detailed scale models for adult collectors
 3. Equipment intended for team use in playgrounds.
 4. Sports equipment
 5. Aquatic equipment intended to be used in deep water
 6. Folk dolls and decorative dolls and other similar articles for adult collectors
 7. 'Professional' toys installed in public places (shopping centres, stations, etc.)
 8. Puzzles with more than 500 pieces or without picture, intended for specialists
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9. Air guns and air pistols
 10. Fireworks, including percussion caps
 11. Slings and catapults
 12. Sets of darts with metallic points
 13. Electric ovens, irons or other functional products operated at a nominal voltage exceeding 24 volts
 14. Products containing heating elements intended for use under the supervision of an adult in a teaching context
 15. Vehicles with combustion engines
 16. Toy steam engines
 17. Bicycles designed for sport or for travel on the public highway
 18. Video games that can be connected to a video screen, operated at a nominal voltage exceeding 24 volts
 19. Babies' dummies
 20. Faithful replicas of real fire arms
 21. Costume jewellery for children
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APPENDIX 2. GUIDE ON THE USE OF PICTOGRAMS IN ADVERTISING

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Reviewed by: RB

Approved by: RB

Date posted online: 15/06/2022

19 of 28

1. Introduction

This document contains the provisions relating to the use of pictograms in the audiovisual advertising of toys

Academic research places the average age at which children begin to master literacy skills at around six years of age, although in the specific case at hand, the size of the overlays and the short time of the spots could make readability difficult even for older age groups.

For this reason, the replacement of warning captions with icons easily recognizable by children is proposed to increase the comprehension of this information, so that children can understand and know the real characteristics of toys, even if they are not yet able to read text.

The Spanish Association of Toy Manufacturers has made an effort since its origins to work towards responsible communication that protects this special public that constitutes childhood.

This commitment was what prompted the association to draw up the first sectoral self-regulation code in 1993 and that has been reaffirmed in the successive updates that have been carried out in 2010 and 2015 to respond to the economic, cultural and technological transformations that have taken place in society.

And this responsibility is what leads us in 2019 to seek new formulas that reinforce our commitment to, legal, honest and truthful advertising.

One of the initiatives that contributes to achieving these objectives is the substitution of warning captions or overlays that provide additional information about the toy in audiovisual advertising with icons that facilitate the understanding of these messages by the receiving public.

It is important to emphasise that it is not a question of constructing a new symbolic code that replaces the icons established by the compulsory marking in terms of toy safety, nor of establishing a system of pictograms to complete the information contained in the product packaging, which will continue to be governed by the same obligations, but its scope of application will be limited only to audiovisual advertising on television and in digital media (banners, web, apps...).

2. Scope

Indications on the formats to which the pictograms can be applied and suggestions for use

This document will be applicable to the audiovisual advertising of toys, in any of the formats of such nature in which they are presented: television, digital video formats...

These pictograms have been designed to inform about the characteristics of the advertising message, so as to facilitate its understanding. For this reason, they cannot be used together with other types of pictograms of another nature (for example, pictograms related to the safety of toys or recycling), or in a different context than the one for which they have been designed, in order to avoid confusion in the reception of the message

Nor may they be used in other ways than those described or for other and specific

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purposes of the companies.

3. Recipients

Description of the audience to which this guide is directed.

This guide and the use of pictograms in toy advertising is aimed at toy advertisers who advertise in audiovisual formats and who are associated with the Spanish Association of Toy Manufacturers and, therefore, are entities adhering to the Code of Self-regulation of Children's Toy Advertising.

4. Pictogram size

Indications about the percentage on the screen that the pictograms must occupy in the different formats through which they are broadcast

For correct reading and comprehension, the pictogram must have a minimum screen occupancy rate of 7%, both with regard to the icon itself and the text that will accompany it in its first year.

Examples of the pictograms with a screen occupancy percentage of 7% in different formats are attached.



This size would make it possible to include, if necessary, two or three icons simultaneously or other similar options, without this being a problem for the viewer's understanding or hindering the viewing of the spot itself

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5. Location of the pictograms

Indications on the location of placement of the pictograms on the surface of the different formats in which the advertisement is disseminated

As a recommended location to place the pictogram, the upper left part is suggested, since research on the functioning of the eye in the reading process highlights that we read from left to right and from top to bottom, following a Z path.

In this sense, the icon will be situated in the main location, from where the reading of the ad starts.

However, if due to the layout of elements in the spot, this place is not possible or visible, other spaces are recommended to avoid covering relevant parts of the screen:

- the top right
- top centered
- bottom centered

The possibility of placing the pictogram at the height of the toy in the packshot is also offered, so that the understanding of the properties of the toy is facilitated. For example, the battery-operated icon right next to the battery-operated toy or the price on those toys that exceed the displayed bands.



However, the packshot will offer greater flexibility to place the pictogram where it can best be read, since several may have to co-exist.

In the case of final shots that include the same pictogram (when it affects all the toys) several times, it should be taken into account that:

- a) If the pictograms affect all the toys in the packshot, they can be included only once – without the need to repeat them for each toy – according to the previous recommendations. And as long as it is not included in such a way as to suggest that the pictogram affects only one toy from the range shown (e.g. right next to one of the toys).
- b) If the pictograms do not affect all the specific toys in the still life, they must be included right next to the corresponding toy.

In any event, the pictogram placement must ensure the correct understanding of the advertising message by the child and must not coexist with other pictograms related to other types of information, as indicated in point 2. In the event that other pictograms appear, for example that relating to the recommended age for an app, these will be governed by the provisions established for this purpose.

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4. Duration of the pictograms

Indications about the time that the fixed pictograms have to be on the screen

The pictograms, given their lower reading complexity, since they are absorbed at a single glance, without having to interpret them word by word like normal text, need less time to remain on the screen than a caption, so they must remain for 2 seconds (and its message corresponds to the scene that is appearing on the screen and that it is necessary to identify, such as 'animated fiction').

This length could be reduced to 1.5 seconds in those cases in which the scene in question that needs to be identified with a pictogram does not last more than this time, so if the icon remains on the screen longer, it could lead to confusion about the true nature of the toy, and provided that there is no other scene of at least 2 seconds in which the longer-lasting pictogram can be inserted.



Likewise, in the event that several pictograms coexist on the screen at the same time, it will be taken into account that the length of time required to be able to perceive all of them may be longer and will be adjusted accordingly, adding an additional second for each icon.

5. Co-existence of pictograms with warning messages

Indications on the period of coexistence of the pictograms with the warning captions when part of the same set

A minimum period of one year is established for the pictograms to be accompanied by warning captions that are part of the same image set. In this sense, it will not be necessary if the icons are placed, also to place the overprint, since the caption is adjacent to the pictogram.

An exception will be made with the pictograms related to price, which should not have a message, since the message contained within the icon is sufficiently clear.



Likewise, those captions that do not have a pictogram will be used under the same provisions that have been followed to date.

Lastly, a maximum period of three years is established for advertisers to be able to include the pictograms in the advertisements as they issue new executions. Meanwhile, they will be able to continue using the traditional messages where they have already obtained positive Copy Advice® from AUTOCONTROL.

After those three years, all the audiovisual announcements of companies associated with AEFJ and, therefore, signatories of the Code, should include the corresponding pictograms (without any type of text, or overprinting at the bottom, except in those cases where it is necessary to explain certain information that is not clear via pictograms).

6. Type of pictograms and colour variety

To facilitate the insertion of the pictograms in the spots, each of them is offered in a variety of colours.

When selecting the colour of a pictogram, it must be guaranteed that it has good contrast with the background, to facilitate its visibility.

The following pictograms are established:



7. Ownership of the pictograms

The pictograms are the property of the Spanish Association of Toy Manufacturers as a Community design; their use is assigned to its associated members, within its commitment to comply with the Code of Ethics for Children's Toy Advertising.

If you wish to use these pictograms, you must contact the Spanish Association of Toy Manufacturers(mfrances@aefj.es).

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Annex 3 is the Code of Conduct on the use of influencers in advertising AEA – Autocontrol; this is not translated here but is separately available in English on the Wikiregs database

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