

## Privacy Policy

- 1) We respect your privacy and your choices.
- 2) The privacy and security of your data are incorporated into our policy.
- 3) We send marketing communications unless requested to be canceled.
- 4) We never offer or give your data, without your express consent.
- 5) We assume a commitment to transparency regarding the use of your data.
- 6) We do not use your information without informing you or having requested your consent.
- 7) We respect your rights as established in the regulations and in accordance with our own legal and operational responsibilities.

For more information about our privacy practices, below, we will establish what types of personal information we may collect or maintain about you, how we may use them, with whom we may share them, how we protect them, and how you can exercise your rights with respect to such data. .

When you share your personal data with us or when we collect personal information about you, we use it in accordance with this Privacy Policy (hereinafter, the "Policy"). If you have any questions or concerns about your personal data, contact us at [info@grupoestupendo.com](mailto:info@grupoestupendo.com).

### 1. WHO ARE WE?

ESTUPENDO FRANCHISES SCP, with address at Coronel Bens nº1 3-izq in Arrecife with CIF J76078898 is responsible for the personal data that you share with us. Therefore, ESTUPENDO FRANCHISES SCP is responsible for data processing for the purposes of applicable regulations on data protection.

## 2. PERSONAL DATA

Personal Data refers to any information or data that can identify you directly (for example, your name or surname) or indirectly (for example, your national identity document or D.N.I.). The Personal Data includes information such as email / personal postal addresses / mobile phone, user names, profile images, personal preferences, user generated content, among others. It could also include numeric identifiers such as the IP address of your computer or the MAC address of your mobile device, as well as the information we obtain through cookies

This Policy covers all personal data collected and used by ESTUPENDO FRANCHISES SCP.

## 3. COLLECTION OF PERSONAL DATA AND PURPOSE OF THE TREATMENT

Remember that before you start using any of our services or functionalities, you should read this Policy. Failure to provide certain information indicated as mandatory, may entail that it is not possible to manage your registration as a user or the use of certain features or services available through ESTUPENDO FRANCHISES SCP.

What data of yours can we collect?

We can collect or receive your data through our websites, forms, applications, devices, among others. In some cases, you provide us with your Personal Data directly (for example, when you contact us), in other cases we collect them (for example, using cookies to understand how you use our websites / apps) or, in other cases, occasions, indirectly when we receive your data from other third parties, including other entities of the associated to ESTUPENDO FRANCHISES SCP.

What is the legal basis for the Treatment of your Personal Data?

- Your consent;
- Our legitimate interest, which can be:
  - o Realization of statistics: to help us better understand their training needs and, therefore, improve our services, websites / applications / devices, etc ...
  - o Allow the operation of our website / applications through technical and functional cookies: keep our tools (websites / applications / devices) safe and secure and guarantee that they work correctly and improve continuously.
  - o Offer our customer service.
  - o Remission by electronic means, or other means of equivalent communication, of invitations to attend events or conferences organized by SUPERVISOR FRANCHISES SCP, or by third parties whose attendance will be in any case voluntary and that may entail the requirement of registration in it by part of the interested party.

o Referral of surveys related to the quality of the service. ESTUPENDO FRANCHISES SCP may send surveys regarding the quality of the service provided, which the interested party is not obliged to answer.

- In case a contract is formalized: perform the services you request;
- Compliance with legal obligations that involve the processing of personal data.

#### 4. PROFILES

When we send or show personalized communications or content, we can use some techniques described as "profiling" (that is, any form of automated processing of personal data that consists of using that data to evaluate certain personal aspects of a natural person, in particular to analyze or predict aspects related to personal preferences, interests, location, or operative that has been made with SUPERVISOR FRANCHISES SCP). This means that we can collect personal data about you to carry out this profile creation. We centralize this information and analyze it to evaluate and predict your preferences and / or personal interests. Based on our analysis, we send or show communications and / or content adapted to your interests / needs.

We inform you that you have the right to object to your personal data being processed based on profiling in certain circumstances. For this purpose, consult the section "rights of the interested party and exercise" (point 10).

#### 5. WHO CAN ACCESS YOUR PERSONAL DATA?

5.1. We can share your personal data within the companies associated with ESTUPENDO FRANCHISES SCP.

"Who / Who can have access to your Personal Data?", Your data can not be transferred to third parties unless there is a legal basis of legitimate interest, to fulfill administrative purposes of the same, on the legal basis of the obligation to keep your details on a deletion list, if you have asked us not to send you more commercial communications.

5.2. Your personal data can also be processed on our behalf by our trusted third-party providers.

We sign contracts with trusted third parties to perform a variety of services on our behalf. We only provide them with the information they need to perform the service, and we require them not to use your personal data for any other purpose. We always do our best to ensure that all third parties with whom we work maintain the security of the personal data we provide them.

## 6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We only keep your Personal Data for as long as we need them for the purpose or purpose for which they were collected with your express consent, in order to satisfy your needs or to comply with our legal obligations.

To determine the data retention period of your Personal Data, we use the following criteria:

- Personal Data obtained when contacting us for a consultation or claim: Personal Data during the time necessary to attend your inquiry;
- Personal Data obtained when giving their consent to send communications or because they are necessary in accordance with the regulations: until the end of the purpose for which they were required.

We may retain some personal information to comply with our legal or regulatory obligations, as well as to administer our rights (for example, to assert our claims in court) or for statistical or historical purposes.

When we no longer need to use your personal data, it will be removed from our systems and records or anonymized so that we can no longer identify them.

## 7. ARE YOUR PERSONAL DATA SAFELY KEPT?

We are committed to protect your Personal Data and to take all reasonable precautions to do so. We demand contractually that trusted third parties who handle your Personal Data do the same.

We always do our best to protect your Personal Data and once we have received your personal information, we use strict procedures and security features to try to prevent unauthorized access. As the transmission of information through the Internet is not completely secure, we can not guarantee the security of your data transmitted to our site. Therefore, any transmission is at your own risk.

## 8. LINKS TO THIRD PARTY SITES AND SOCIAL LOGIN

Our websites and applications may contain links to and from the websites of our associated networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we are not responsible for these policies. Check these policies before sending personal information to these websites.

## 9. SOCIAL MEDIA AND CONTENT GENERATED BY THE USER

Remember that any content sent to one of our social media platforms can be seen by the public, so you should be careful when providing certain personal information (for example, financial information or your address details). We are not responsible for any action taken by

other people if you post personal information on one of our social media platforms and we recommend that you do not share that information.

## 10. RIGHTS OF THE INTERESTED PARTY AND EXERCISE

ESTUPENDO FRANCHISES SCP respects your right to privacy: it is important that you have control over your personal data. In this regard we inform you that you have the following rights:

Right to Information You have the right to obtain clear, transparent and easy to understand information about the way we use your personal data and your rights. We provide you with this information in this Policy.

Right of access You have the right to access the personal data we have about you (with certain limits).

We may charge a reasonable amount, prior notice, to cover the administrative costs incurred in providing the information.

Obviously unfounded, excessive or repetitive requests may not be addressed.

To exercise this right, you can contact us through the means indicated in "Contact".

Right to rectification You have the right to have your personal data rectified when they are inaccurate or have ceased to be valid or to have them completed when they are incomplete.

To exercise this right, you can contact us through the means indicated in "Contact"

Right to delete / forget In certain cases, you have the right to have your personal data deleted or deleted. It should be noted that this is not an absolute right, since we may have legal or legitimate reasons to keep them.

If you want us to delete your personal data, you can contact us through the means indicated in "Contact".

Right to oppose direct marketing, including the preparation of profiles You can unsubscribe from our direct marketing communications at any time.

You can unsubscribe by clicking on the "Unsubscribe" link in any email communication that we send you. Otherwise, contact us by any of the means indicated in "Contact".

To oppose the creation of profiles, you can contact us through the means indicated in "Contact".

Right to withdraw consent at any time when data processing is based on consent You can withdraw your consent to the processing of your personal data when the treatment is based on your consent. The withdrawal of consent will not affect the legality of the treatment based on the consent prior to its withdrawal. To find out about the cases in which the treatment is

based on consent, we refer you to the section "What data do we collect?", "What is the legal basis for handling your Personal Data?".

If you wish to withdraw your consent, you can contact us by any of the means indicated in "Contact".

Right to oppose the treatment based on the satisfaction of legitimate interests You can object at any time to treat your data when the treatment is based on the satisfaction of legitimate interests. To find out about the cases in which the treatment is based on legitimate interests, we refer you to the section "What data do we collect?" "What is the legal basis for handling your Personal Data?"

If you wish to exercise this right, you can contact us by any of the means indicated in "Contact".

Right to file a claim with a control authority You have the right to claim the privacy and data protection of ESTUPENDO FRANCHISES SCP before the Spanish Data Protection Agency.

Do not hesitate to contact us by any of the means indicated in "Contact" before submitting a claim to the competent authority on data protection.

Right to data portability You have the right to transfer, copy or transfer data from our database to a different one. It is only possible to exercise this right with respect to data that you have provided, when the treatment is based on the execution of a contract or your consent and the processing is carried out by automated means. To be informed of the cases in which the treatment is based on contract or consent, we refer you to the section "What data do we collect?", "What is the legal basis for handling your Personal Data?".

For more information, you can contact us by any of the means indicated in "Contact".

Right to limit treatment You have the right to request limitation of the processing of your data. If you exercise this right, the processing of your data will be subject to limitations, so we can store them but we can not continue using them or treating them. This right can only be exercised in certain circumstances defined by the General Data Protection Regulations, as follows:

- that the interested party challenges the accuracy of the personal data, during the period that allows the responsible to verify the accuracy of the same;
- that the treatment is unlawful and the interested party opposes the deletion of personal data and requests instead the limitation of its use;
- that the person in charge no longer needs the personal data for the purposes of the processing, but the interested party needs them for the formulation, the exercise or the defense of claims;
- that the interested party has opposed the treatment under Article 21, paragraph 1 of the Regulation (Opposition Law), while verifying whether the legitimate reasons of the person in charge prevail over those of the interested party.

If you wish to exercise this right, you can contact us by any of the means indicated in "Contact".

**CONTACT:**

If you have any questions about the way we treat and use your personal data or wish to exercise any of the rights provided, you can notify us by sending an email to [info@grupoestupendo.com](mailto:info@grupoestupendo.com) or by writing to the following address: Coronel Bens nº1 3- left in Arrecife.