#### PRIVACY POLICY

# 1. Who is responsible for processing your data?

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#### 2. What type of data do we have about you and how did we obtain it?

The categories of personal data that we process about clients and suppliers are:

- I. Identification data
- II. Postal or electronic addresses
- III. Commercial information
- IV. Economic and transaction data
- V. Navigation data

We have obtained all the data mentioned above directly from you through the presentation of a commercial offer, contractual proposal, etc. or through your company by providing us with the identification data and other information necessary to carry out the purpose of the contractual relationship between the parties or through registration in the case of students. It will be your or your company's obligation to provide us with updated data in the event of a change.

#### 3. For what purpose do we process your data?

We process the data provided to us by interested parties to manage different activities derived from specific procedures carried out regarding information requests, provision of services, sales, after-sales service, supplier management, quality of services, etc. In this way, we will use your data to carry out any of the following actions:

- I. Provision of the requested services or delivery of the purchased product.
- II. Sending the information requested from us through the contact form on our website or any other means of contact with our company,
- III. Provide both potential clients and our clients with offers of products and services of interest to them,
- IV. Carry out the administrative, fiscal and accounting management of our clients, users and/or suppliers.
- V. Carry out satisfaction surveys, market studies, etc. to be able to offer you the most appropriate offers and an optimized quality of service, etc.

To carry out any of these purposes, electronic means such as email, WhatsApp, etc. may be used.

We also inform you of the creation of a Google Apps account, including email and Google Drive, as a means of communication between both parties and as part of the teaching tools we use.

Without prejudice to the above, we inform you that health data such as allergies or other diseases that could cause serious harm to the interested party may be displayed in restricted areas for consultation by school personnel if their knowledge may be necessary to preserve the VITAL INTEREST of the interested party.

## 4. How long will we keep your data?

The personal data relating to natural persons linked to potential clients, clients and suppliers that we collect through the different contact forms and/or information collection (including the data collected through cookies, if applicable) will be kept as long as their data deletion is not requested by the interested party. The data provided by our clients and suppliers will be kept as long as the commercial relationship between the parties is maintained, respecting in any case the minimum legal retention periods depending on the matter.

Student data will be deleted in accordance with the provisions of educational legislation. In any case, we will keep your personal data for the period reasonably necessary considering our needs to respond to questions that arise or resolve problems, make improvements, activate new services and comply with the requirements of applicable legislation. This means that we may retain your personal data for a reasonable period even after you have stopped using our products or after you have stopped using this website. After this period, your personal data will be deleted from all our systems.

## 5. What is the legal basis for the processing of your data?

Depending on the type of data processing, the basis of legitimacy is the following:

TREATMENT	BASIS OF LEGITIMATION
Accounting Management: Invoicing management with clients and / or suppliers	Maintenance, development and control of the current relationship between the parties
<b>Fiscal Management:</b> application of withholdings , bonuses , etc.	Maintenance, development and control of contractual relationship between the parties; Legal obligations compliance.
Administrative management: management of the contracted service, logistics management, warehouse, customer deliveries, receipt of goods, etc.	Maintenance, development and control of current relationship between the parties
Marketing: Commercial actions on our products and services as to our clients or to the fact that the people who have not requested information related to us, our products and services in the past, including conducting surveys to the satisfaction of our customers.	Free and unequivocal consent from the interested party (potential clients), We inform that the withdrawal of this consent in no case can condition the execution of the contract that existed between the parties; legitimate interest of the company in the promotion and marketing of products or services similar to those obtained or requested by interested parties in the past.
Management of educational provision to students.	Enrollment Execution.

If you do not provide your personal data, your contract will not be able to be executed, legal obligations or obligations derived from public powers will not be fulfilled.

## 6. To which recipients will your data be communicated?

We will not transfer your personal data to any third-party company that intends to use it in its direct marketing actions, except if you have expressly authorized us to do so.

We inform you that we may provide your personal data to Public Administration bodies and competent Authorities in those cases in which they legally require us or in cases in which, acting in good faith, we consider that such action is reasonably necessary to comply with a judicial process; to respond to any claim or legal demand; or to protect the rights of the company or its clients and the general public.

We inform you that your data will not be transferred or communicated to third parties, the company is solely responsible for its treatment and custody, unless you have expressly authorized us to do so.

We will provide your personal data to third parties (e.g. Internet service providers that help us manage our website or carry out the contracted services, computer support and maintenance companies, logistics companies, tax and accounting agencies, etc.). In any case, these third parties must maintain, at all times, the same levels of security as us in relation to your personal data and, where necessary, they will be bound by legal commitments in order to keep your personal data private and secure, and also to only use the information following specific instructions from the company.

## 7. Data transfers to third countries?

No data transfers to third countries are planned.

# 8. What are your rights as an interested party?

Anyone has the right to obtain confirmation as to whether we are processing personal data that concerns them or not.

Specifically, interested parties can request the right of access to their personal data, as well as receiving it in a common format and machine reading if the processing is carried out by electronic means (right of portability).

Likewise, interested parties may request the right to rectify inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

Additionally, in certain circumstances, interested parties may request the limitation of the processing of their data, or in certain circumstances and for reasons related to their situation, interested parties may exercise their right to oppose the processing of their data. We will stop processing the data, except for compelling legitimate reasons, or the exercise or defense of possible claims or in those exceptions established in the applicable regulations.

Likewise, we inform you that you have the right to withdraw your consents at any time, without affecting the legality of the treatment based on the consent prior to its withdrawal.

Likewise, the User is informed that at any time they can exercise the aforementioned rights by writing to us using the contact information that appears in point 1, attaching a copy of their ID.

You will also have the right to file a claim with the Spanish Data Protection Agency, especially when you have not obtained satisfaction in the exercise of your rights.

## http://www.agpd.es/portalwebAGPD/index-ides-idphp.php

On the other hand, in accordance with the provisions of Spanish Law 34/2002, of July 11, on Information Society Services and Electronic Commerce, we undertake not to send commercial information if you did let us know.