

INSYLO WEB PRIVACY POLICY

Insylo (the "Company", or "we/us"), is committed to protecting the privacy of all users of our website ("You/r"). This Privacy Policy explains our practices regarding the use of personal data collected and processed through our website.

All communications regarding the processing of your personal data shall be directed to gdpr@insylo.com.

DATA CONTROLLER

The entity responsible for your personal data is Insylo Technologies SLU, with tax number B55170641, domiciled at edif. Giroempren B-2-06 pic de peguera nº11, Girona.

DATA COLLECTED

We collect and process the following data:

- a) **Preorder.** If you want to be one of the first companies trying our product, you can register in our platform. We collect the following data about you: your name, surname, address, the name of your company, your phone number, your country, your city and the business your company deals with. If you want, you can provide us further details like your province and zip code. All data defined as mandatory are necessary, if you do not provide us those data, we cannot register you.
- b) **We are hiring!** If you are interested in working with us, you can provide us the data we ask for in our webform. All data defined as mandatory are necessary, if you do not provide us those data, we cannot consider your application.
- c) **Navigation.** Due to the standards of communications on the Internet, when you visit our website we automatically receive the URL of the site from where you come and the site you visit when you leave our website. We also receive the internet protocol ("IP") address of your computer and the type of browser you are using. We use this information to analyze global trends to improve the service. This information is not shared with third parties without your consent. Except for the above, and what is stated in our cookies policy, we do not collect any type of personal data if you are only browsing the website.

It is important that the personal data we have about you is accurate and current. You are responsible for the accuracy of the information you provide to us and you are expected to update the information you provide to us.

PURPOSE OF PROCESSING

We process your personal data for the following purposes:

- Register you in our platform,
- Manage the service or action you are requesting us,
- If you apply for a job, evaluate your profile as a potential employee,
- Make internal analysis to improve our service according to our users' preferences,
- Comply with all legal, regulatory, and administrative obligations we are subject to.

LEGAL BASIS

The legal basis of our processing of personal data are the following:

- Legitimate interest: it means the interest of our company in directing and managing our business in order to provide the best service / product and the best and safest experience. We

make sure to consider and balance any possible impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

- In specific cases, to comply with a legal or regulatory obligation: means to process your personal data when necessary to comply with a legal or regulatory obligation to which we are subject.

DATA DISCLOSURE

We process your personal data confidentially in accordance with the applicable legislation.

Nonetheless, we may need to share your personal information with the parties listed below:

- We may provide access to your data to our service providers, Data Processors who act on our behalf. We do not allow our external service providers to use your personal data for their own purposes and we only allow them to process your personal data for specific purposes and in accordance with our instructions.
- Third parties with whom we can choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other companies or merge with them, if we are part of a bankruptcy proceeding or other control change.
- Third parties with whom we must share your information to investigate suspected fraud, harassment or other violations of any law, rule or regulation, or website policies.

INTERNATIONAL TRANSFERS

We use some third-party service in order to provide our service. Although some of these companies are not within the European Economic Area and may be in countries that do not provide an adequate level of protection, like Google Inc., these companies are part of the USA-EU Privacy Shield. Furthermore, we require all third parties to grant the security of their personal data and to process them in accordance with the law and the contract with us, which includes, in case of international providers outside the UE-US Privacy Shield, the Model clauses of the European Union <<https://www.privacyshield.gov/welcome>>.

DATA RETENTION

We will only retain your personal data for as long as it is necessary to fulfil the purposes for which we have collected it, or to comply with legal, accounting or information requirements.

In order to determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, if we can achieve those purposes through other means and the applicable legal requirements. Normally it will be the duration of the legal relationship with the user / client plus 6 years.

In some circumstances, we may anonymize your personal data (so that they can no longer associate with you) for research or statistical purposes, in which case we may use and retain this information indefinitely without prior notice.

SECURITY MEASURES

We implement security measures and personal data protection schemes as required by law to maintain the confidentiality and integrity of your data and protection against unauthorised access, modification or destruction.

YOUR RIGHTS

All users have right to **request access** to their personal data (commonly known as a "data subject access request"), **request the correction** of the personal data that we hold about them, **request the erasure** of

their personal data, **object to processing** of their personal data where we are relying on a legitimate interest, **request restriction of processing** of their personal data, **request the transfer** to them or to a third party of personal data they have provided us (right to data portability).

You can exercise such rights contacting us at gdpr@insylo.com. You also have the right, if you may wish, to file a complaint to the Agencia Española de Protección de Datos, C / . Jorge Juan, 6, 28001 Madrid, España.

GENERAL

We reserve the right to amend the terms of this Privacy Policy and will notify you by providing a clear notice of these changes by email or on our Website, and in this Privacy Policy. If you continue to use our Services after such update, you will be deemed to accept the new terms. If you do not accept the update, please notify us and we will terminate your Account and remove any of your personal data (except as required to be maintained for legal purposes), and you will not be able to continue to use our Services.

Unless a specific local regulation sets forth to the contrary, the Privacy Policy is governed by the laws of Spain.

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