

## **PRIVACY POLICY**

Pursuant to current regulations on personal data protection, we inform you of the following:

### **DATA CONTROLLER AND DATA PROTECTION OFFICER**

Innovative Digital Factory S.L. (hereinafter, "THE COMPANY"), with registered address in Spain, is the Data Controller of your personal data.

For any privacy-related matter, to make a request or to ask for clarification regarding the processing of your personal data, please write to the following e-mail and postal address: info@vip-square.com Avenida Diagonal 536, Principal Puerta 1, Barcelona, Spain.

### **THE PERSONAL DATA WE PROCESS AND HOW WE OBTAIN THEM**

The data on you that we process for the legitimate purposes explained below are limited to your mobile telephone number, which you have provided to us (when browsing via a Wi-Fi network) or your telephony services provider has provided to us (when browsing via a 3G network).

### **WHY WE PROCESS YOUR PERSONAL DATA AND THE LEGAL GROUNDS FOR DOING SO**

THE COMPANY will process the data of Users for the purpose of managing the contracted service.

THE COMPANY is entitled to process your data for the purpose of managing the contracted service because such action is necessary for compliance with the contractual obligations of THE COMPANY under said contracts.

### **WHEN AND WHY WE SHARE YOUR DATA WITH THIRD PARTIES**

Your data may be shared with the data recipients listed below for the reasons also listed below:

- Public authorities: for compliance with the legal obligations to which THE COMPANY may be subject due to its business activity.
- Accounts auditing companies: for compliance with the legal accounts auditing obligations to which THE COMPANY may be subject due to its business activity.
- State law enforcement agencies: when our organisation is required to provide information due to compliance with a legal obligation.
- Suppliers that need access to your data for providing the services that THE COMPANY has contracted from said suppliers and with which THE COMPANY has signed the confidentiality and personal data processing agreements necessary and required by regulations for protecting your privacy.
- And any other third party with which THE COMPANY is required to share your data by law.
- If THE COMPANY shares personal data in the future, you will be duly informed.

### **INTERNATIONAL DATA SHARING**

THE COMPANY informs you that it collaborates with third parties that will act as service providers under legal regulations. Said providers may have access to your personal data insofar as that they may provide the services and/or comply with the obligations stemming from the legal relations maintained between said third parties and THE COMPANY within the framework of undertaking the business of THE COMPANY. At any event, THE COMPANY has signed the corresponding

confidentiality and data protection agreements with said providers in full compliance with the provisions of current data protection regulations.

## **HOW LONG WE KEEP YOUR DATA**

Your personal data will be kept for as long as your relationship with THE COMPANY exists and, following expiry thereof on any grounds, for the legal periods of prescription that may apply. In this case, they will be processed for the sole purpose of demonstrating compliance with our legal or contractual obligations. Following said periods of prescription, your data will be deleted or, alternatively, anonymised.

## **YOUR RIGHTS**

You may exercise your rights of access, rectification, elimination, portability, limitation on and/or opposition to processing via the postal addresses indicated above.

Furthermore, if you believe that the processing of your personal data breaches regulations or your privacy rights, you may lodge a complaint:

- With THE COMPANY, via the postal addresses indicated above.
- With the INFORMATION REGULATOR, via its e-office or postal address.