

# **POLÍTICA DE PRIVACIDAD**

### What is the purpose of our Privacy Policy?

UNNAX, which manages the <u>www.unnax.com</u> website, attaches great importance to the protection and confidentiality of your personal data, which we consider to be a guarantee of reliability and trust.

As such, our Personal Data Privacy Policy precisely reflects our commitment to ensuring that UNNAX complies with the applicable rules on the protection of personal data and, more specifically, those of the General Data Protection Regulation ("GDPR").

In particular, our Privacy Policy aims to inform you about how and why we process your personal data in connection with the services we provide to you.

### Who is our Privacy Policy for?

Our Privacy Policy applies to you, regardless of where you live, as long as you are at least 14 years of age, whether you are a customer, a candidate for a position with UNNAX, or a visitor to <a href="https://www.unnax.com">www.unnax.com</a>.

If you are under the legal age detailed above, you are not authorized to use our services without the prior and explicit consent of one of your parents or the holder of parental authority, which must be sent to us by email at <a href="mailto:dpo@unnax.com">dpo@unnax.com</a>.

If you believe that we are holding personal data about your children without your consent, please contact us at the dedicated address detailed above.

#### Why do we process your personal data and on what basis?

We process your personal data mainly for the following purposes:

 To browse our website, to benefit from our banking and financial services and so that we can respond to your requests (e.g. requests for information,

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- complaints via our online contact form) on the basis of our general terms of use and our legitimate interest in providing you with the best possible service.
- Stay informed of our latest offers and events by email, telephone and post, based on our legitimate interest in building customer loyalty and prospecting potential new customers.
- To manage any unpaid invoices, on the basis of our legitimate interest in obtaining consideration for the provision of our service and on the basis of our general terms and conditions.
- Follow us and comment on our publications on social networks on the basis of our legitimate interest in having a dedicated page on social networks.
- **To receive our newsletter** informing you of all the latest news concerning our services on the basis of our legitimate interest in customer loyalty.
- Apply for a position with Unnax on the basis of discussions we have with you during the recruitment process and our legitimate interest in recruiting and selecting candidates.
- Benefit from our blog and FAQ on the basis of our general terms of use.
- Benefit from our customer service on the basis of our legitimate interest in responding to your complaints and requests and on the basis of our general terms and conditions of use.
- **Respond to our satisfaction surveys** on the basis of our legitimate interest in taking your feedback into account in order to improve our service.
- To participate in our online advertising campaigns based on our legitimate interest in promoting our services and reaching new customers.
- **To make an appointment** with our teams on the basis of our legitimate interest in offering you an easy way to make an appointment with us.



- To combat fraud, money laundering and the financing of terrorism on the basis of our legal obligations.
- To manage your participation in Webinars and external events based on our legitimate interest in promoting our services.
- **Use our Chatbot** on the basis of our legitimate interest in exchanging easily with you.
- To operate the videos on our site on the basis of our legitimate interest in offering you content in video format.
- To guarantee and reinforce the security and quality of our day-to-day services (e.g. statistics, data security, etc.) on the basis of our legal obligations, our general terms of use and our legitimate interest in ensuring the proper functioning of our services.

# How did we obtain your personal data?

Your data is collected directly from you when you are a customer of our services or a "simple" visitor to our website <a href="www.unnax.com">www.unnax.com</a> and we undertake to process your data only for the purposes described above.

Your personal data may also be processed indirectly in connection with trade fairs or social networks (e.g. Linkedin).

On the other hand, when you voluntarily publish content on the pages we publish on social networks, you acknowledge that you are entirely responsible for any personal information you may transmit, whatever the nature and origin of the information provided.

#### What personal data do we process and for how long?

We have summarized the categories of personal data and their respective retention periods below:



- Professional identification data (e.g. surname, first name, position, company, etc.) and contact details (e.g. e-mail address and business telephone number, etc.) are kept for the duration of the service, plus the statutory limitation periods, which are generally 5 years.
- Postal address for our commercial prospecting campaigns by mail, kept for a maximum of 3 years from the last contact we had with you.
- Telephone number used for our commercial telephone prospecting campaigns, kept for a maximum of 3 years from the last contact we had with you.
- **Email address,** kept for a maximum of 3 years from the last contact we had with you **as part of our email prospecting campaigns**, and kept until the end of your newsletter subscription **to receive our newsletter**.
- Data indicated in the CV and cover letter kept for the duration of the recruitment process and for 2 years from the date of your application.
- Connection data (e.g. logs, IP address, etc.) stored for 1 year.
- **Cookies** are generally stored for a maximum of 13 months. For more details on how we use your cookies, please consult our cookies policy, which is available at all times on our website.

Once the applicable retention periods have expired, the deletion of your personal data is **irreversible** and we will no longer be able to communicate it to you. At most, we can only keep anonymous data for **statistical purposes**.

Please also note that in the event of **litigation**, we are obliged to retain **all** personal data concerning you for the duration of the case, even after the expiry of the retention periods described above.

# What rights do you have to control the use of your personal data?

The applicable data protection regulations grant you specific rights which you can exercise, at any time and free of charge, to control the use we make of your data.



- Right to access and copy your personal data, provided this request does not conflict with business secrecy, confidentiality or the secrecy of correspondence.
- Right to **rectify** personal data that is incorrect, outdated or incomplete.
- The right to object to the processing of your personal data for commercial prospecting purposes.
- The right to request **the deletion** ("right to be forgotten") of personal data that is not essential to the proper functioning of our services.
- The right to **limit** the use of your personal data, which allows you to restrict the use of your data in the event of a dispute over the legitimacy of processing.
- The right to data portability, which enables you to retrieve part of your personal data so that it can be easily stored or transmitted from one information system to another.

For a request to be considered, you must submit it directly through the following channels:

#### • By postal mail:

To Unnax Regulatory Services EDE, S.L.U. DPO Plaza Europa n.º 22-24, Planta 4, módulo 2

08902 L'Hospitalet de Llobregat (Barcelona)

• By e-mail: dpo@unnax.com.

Any request not made in this way cannot be processed. Requests cannot come from anyone other than you. We may therefore ask you to provide proof of identity if there is any doubt about the identity of the person making the request.



We will respond to your request as quickly as possible, subject to a maximum of three months from receipt if the request is technically complex or if we receive many requests at the same time.

#### Who can access your personal data?

Your personal data is processed by our teams and by our technical service providers for the sole purpose of operating our service.

We check all our technical service providers before recruiting them, to ensure that they comply scrupulously with the rules applicable to the protection of personal data.

# Can your personal data be transferred outside the European Union?

Personal data processed by our website is exclusively hosted on servers located within the European Union.

Furthermore, we do our utmost to use only technical tools whose servers are also located within the European Union. However, if this is not the case, we scrupulously ensure that they implement the appropriate guarantees required to ensure the confidentiality and protection of your personal data.

Within the framework of providing our services and optimizing our internal operations, your personal data may be shared with other entities within the corporate group to which UNNAX belongs (hereinafter, the "Group"), always ensuring an adequate level of protection and in compliance with the provisions of Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and other applicable data protection regulations.

This exchange of information aims to:

• **Improve internal management**: Optimize our processes and resources to provide you with a more agile and efficient service.



- **Provide better service**: Achieve more coordinated and tailored assistance based on your specific needs.
- Ensure compliance with internal and legal obligations: Guarantee that all operations within the Group comply with applicable regulations.

All Group entities that access your personal data will implement appropriate technical and organizational security measures to ensure its confidentiality, integrity, and availability. Furthermore, if any Group entity is or becomes located outside the European Economic Area (EEA), appropriate safeguards will be implemented, such as the European Commission's Standard Contractual Clauses, in compliance with GDPR requirements.

The data will be processed confidentially and will only be used for the aforementioned purposes. At all times, you will have the option to exercise your rights of access, rectification, erasure, and objection in accordance with the applicable legislation.

If you have any questions or require further information on how we manage your data, please do not hesitate to contact us.

# How do we protect your personal data?

We implement all the technical and organizational means required to guarantee the security of your personal data on a daily basis and, in particular, to combat any risk of destruction, loss, alteration or disclosure.

### Do we use cookies when you browse our website?

Please note that we use cookies when you browse our website. For more information, please consult our Cookie Policy.

# Who can you contact to obtain more information about the use of your personal data?



To best guarantee the protection and integrity of your data, we have officially appointed an independent Data Protection Officer ("DPO") to our supervisory authority.

You can contact our DPO at any time to obtain more information or details on how we process your data through the following channels:

• By postal mail:

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To Unnax Regulatory Services EDE, S.L.U. DPO
Plaza Europa n.º 22-24, Planta 4, módulo 2
08902 L'Hospitalet de Llobregat (Barcelona)
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• By e-mail: dpo@unnax.com

#### How can you contact AEPD?

You may contact AEPD at any time at the following address:

• By postal mail:

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AEPD

C/ Jorge Juan, 6

28001 Madrid (Spain)
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• <u>By telephone on</u>: +34 900 293 183

# Can the Privacy Policy be modified?

We may modify our Privacy Policy at any time to adapt it to new legal requirements and to new processing operations that we may implement in the future.