

PRIVACY POLICY – VOLTEO DIGITAL

Contents

1. GENERAL INFORMATION
2. PURPOSE OF DATA PROCESSING
3. LEGAL BASIS FOR PROCESSING
4. WITH WHOM WE SHARE THE INFORMATION
5. DATA RETENTION PERIODS
6. DATA TRANSFERS
7. USER RIGHTS
8. SECURITY MEASURES
9. USE OF COOKIES AND SIMILAR TECHNOLOGIES
10. CHANGES TO THIS POLICY
11. CONTACT INFORMATION

1. GENERAL INFORMATION

Data Controller:

Company Name: Volteo Technologies Europe, S.L.

Address: Pº de la Castellana, 53, 1st Floor, 28046 Madrid, Spain.

Contact Email: legal@volteodigital.com

Phone: +34 91 186 35 92

Volteo Digital is committed to protecting the personal data of its users and clients, complying with applicable regulations, including the General Data Protection Regulation (EU Regulation 2016/679, “GDPR”) and the Spanish Organic Law 3/2018 on Data Protection and Guarantee of Digital Rights (“LOPDGDD”).

2. PURPOSE OF DATA PROCESSING

The personal data we collect is used for the following purposes:

- User and client management: Processing requests, responding to inquiries, and providing services.
- Commercial communications: Sending information about products, services, promotions, and news, provided express consent has been given.
- Security and fraud detection: Ensuring the security of our systems and preventing fraudulent activity.
- Website and user experience improvement: Statistical analysis of navigation and user behavior.

3. LEGAL BASIS FOR PROCESSING

The processing of your personal data is based on the following legal grounds:

- Contract performance: When the processing is necessary to provide the requested services.
- User consent: For sending commercial communications or using certain cookies.
- Legitimate interest: To improve our services and ensure the website's security.
- Legal compliance: In cases where the law requires data retention or disclosure.

4. WITH WHOM WE SHARE THE INFORMATION

Volteo Digital does not sell or rent personal data to third parties. However, we may share personal information with:

- Service providers: Companies offering essential services for our business operations, such as web hosting, technical support, payment processing, and email delivery.
- Group companies: When necessary for proper service delivery or internal group management.
- Competent authorities: When required by law or in response to a valid legal request from government or judicial bodies.
- Strategic partners and authorized third parties: When necessary to fulfill contractual obligations or with user consent.

All third parties we share information with ensure data protection and compliance with applicable privacy regulations.

5. DATA RETENTION PERIODS

Personal data will be retained for the time necessary to fulfill the purpose for which it was collected and to determine potential liabilities arising from the processing:

- Contact and client data: Until the end of the contractual relationship and during the legally required retention period.
- Data for commercial communication purposes: Until the user requests deletion or withdraws consent.

6. DATA TRANSFERS

The information we collect about you may be transferred, stored, and processed in countries where Volteo Digital group entities operate, in order to ensure you benefit from our services and enhance your user experience.

We may also transfer your personal data to service providers involved in maintaining our websites, applications, or any other tools used for processing our clients' or prospects' data.

Some recipients may be located in countries outside the European Economic Area (EEA). When we transfer your personal data to countries that do not offer an equivalent level of data protection, we will ensure such transfer complies with applicable regulations through:

- Standard Contractual Clauses (SCCs) approved by the European Commission.
- Intra-group agreements with appropriate safeguards, where applicable.
- Additional security measures to protect transferred data.

You may request a copy of these safeguards via the contact email provided in this policy.

7. USER RIGHTS

Users may exercise the following data protection rights:

- Right of access: Obtain information about the data we process.
- Right to rectification: Request the correction of inaccurate data.
- Right to erasure: Request deletion of your data in specific cases.
- Right to restrict processing: Request limitation of data use in certain situations.
- Right to object: Object to processing based on legitimate interest.
- Right to data portability: Receive your data in a structured format.
- Right to withdraw consent: When processing is based on prior consent.

To exercise these rights, you may send an email to legal@volteodigital.com with the subject "Data Protection" and attach a copy of your ID.

If you believe your rights have not been properly addressed, you may file a complaint with the Spanish Data Protection Agency (AEPD) at www.aepd.es.

8. SECURITY MEASURES

Volteo Digital applies technical and organizational measures to protect personal data from unauthorized access, loss, destruction, or alteration. These include:

- Encryption of sensitive data to ensure confidentiality during transmission and storage.
- Restricted access control to ensure only authorized personnel access personal data.
- Regular audits and reviews to assess system security and detect vulnerabilities.
- Regular backups to prevent data loss in case of technical incidents.
- Internal incident response protocols to manage and mitigate any potential data breaches.

9. USE OF COOKIES AND SIMILAR TECHNOLOGIES

Cookies are small data files that a website stores in the user's browser to ensure proper operation and improve the browsing experience.

Our website uses only essential technical cookies required for proper operation, secure browsing, and service delivery. These cookies do not collect personal data nor are they used for analytics, advertising, or tracking purposes.

Since these cookies are essential to the site's operation, they do not require user consent and cannot be disabled through our settings. However, you may manage or block cookies via your browser settings if you wish.

For more information on how to manage cookies in your browser, please refer to the following guides:

- Google Chrome
- Mozilla Firefox
- Microsoft Edge
- Safari

10. CHANGES TO THIS POLICY

Volteo Digital reserves the right to modify this privacy policy at any time. We recommend regularly reviewing this page to stay informed about any changes.

11. CONTACT INFORMATION

If you need to modify or update the information we store about you, adjust your preferences, or make any inquiries related to your personal data protection, you may contact us via the following email: legal@volteodigital.com