

# PRIVACY POLICY

By reading this Privacy Policy, the User is informed about the way in which Cyber Guardian collects, processes and protects the personal data that are provided through the website <u>https://cyberguardian.tech</u> (hereinafter, the "**Website**").

## 1. WHO WILL PROCESS YOUR PERSONAL DATA

Data Controller: Cyber Guardian Solutions, S.L., (hereinafter, "Cyber Guardian").

Registered office: Avda. De Cantabria s/n, 28660, Boadilla del Monte, Madrid, Edificio Amazonia.

VAT number ESB13978960.

Public Registry: Commercial Registry of Madrid Volume 45399, Folio 168, Sheet 798541, Entry 1. E-mail: contact@cyberguardian.tech .

# 2. FOR WHAT PURPOSE AND ON WHAT BASIS OF LEGITIMATION WILL CYBER GUARDIAN PROCESS THE USER'S PERSONAL DATA?

The personal data collected will be processed by CYBER GUARDIAN according to the purposes and on the basis of legitimation indicated below:

Purpose	Legitimation
Develop service offers and budgets requested through the various points enabled for this purpose and allow users to hire the digitalization and cybersecurity solutions offered.	Consent
Formalization of contracts, integral management of the requested service and communication with customers for these purposes, as well as sending commercial communications about products and services of Cyber Guardian that may be of interest and provided that no opposition has been expressed to them.	Contractual relationship
Response to requests, doubts, proposals and complaints that users send through the contact channels shown on the Website, for which we will use your name and the address or telephone number provided or from which you contact us.	Consent
Send commercial communications about Cyber Guardian services, offers and promotions.	Consent
Anonymization of user data to carry out statistical studies based on the information obtained from the development of the Services and the characteristics of the Client, in order to assess the performance of our services. Our legitimate interest is to improve the quality of our services, reduce our costs and better adapt to market needs.	Legitimate interest



Compliance with legally established obligations. Legal obligation

In relation to the processing of data based on consent, the user may revoke his request at any time and free of charge, although this will not affect the legality of the treatments carried out previously.

To revoke their request, the User may contact Cyber Guardian through the contact channels indicated above.

# 3. ORIGIN OF THE DATA

For the contracting of digitization solutions and the provision of contracted services, Cyber Guardian will process the data requested in the contact forms of the Website.

In addition, in order to comply with the obligations arising from the service and to analyze its performance, the data derived from the use and contracting of our products and services will be used.

#### 4. OBLIGATORY PROVISION OF DATA

The forms enabled on these websites will identify the data that must necessarily be filled in. In the event that the user does not provide the data marked as mandatory, Cyber Guardian will not be able to process your request.

If you use third party forms to contract our services, these third parties will inform you of the data that is necessary for the contracting.

#### 5. HOW LONG WILL WE KEEP THE USER DATA?

The data will be processed for the time necessary for the realization of the purposes for which they were collected, unless the user requests their cancelation to Cyber Guardian, in which case we will not be able to fulfill these purposes.

Once these purposes have been fulfilled, they will be kept duly blocked while prescribing the responsibilities that may arise from their treatment or the actions for which they were treated. Once the limitation periods have expired, they will be definitively eliminated.

#### 6. WITH WHOM WILL THE USER DATA BE SHARED?

Cyber Guardian will communicate your data to third parties when required by a contract linking the parties or required by law, for example, your data could be communicated to the Tax Agency, the Public Prosecutor's Office or the Courts and Tribunals.

Likewise, users' data will be shared with those Cyber Guardian providers that require access to the data to provide their services. At all times, Cyber Guardian will guarantee that the third parties with which it contracts allow compliance with the applicable regulations and, in no case, will treat them for purposes other than those indicated by Cyber Guardian.



## 7. IN WHICH COUNTRIES ARE THE USER DATA PROCESSED?

As a general rule, the data processing activities mentioned above are carried out in Spain and in other countries of the European Union. However, for the provision of services, user data will also be processed in other countries, insofar as some of the providers of Cyber Guardian operate from them.

In cases where the data is processed from countries that do not, according to the European Commission, guarantee a level of data protection equivalent to that existing within the European Union, transfers to these countries will be regulated by means of the standard contractual clauses, in addition to other effective measures that can be taken to avoid interference by the authorities of these countries. In addition, some of the providers that process data from abroad have binding corporate rules for the secure processing of personal data that have been approved by one of the supervisory authorities of the member countries of the European Union.

These international transfers are necessary for the provision of services and you cannot object to them. If you do not want your data to be processed in these countries, do not contract the services of Cyber Guardian.

# 7. RESPONSIBILITY OF THE USER

The user:

- You guarantee that you are over 14 years of age and that the data you provide to Cyber Guardian is true, accurate, complete and up-to-date. For these purposes, the user is responsible for the veracity of all the data communicated and will keep the information provided properly updated, in such a way that it responds to their real situation.
- Guarantees that, in case you provide information from third parties, you have informed them of the aspects contained in this document. It also guarantees that it is entitled to provide its data to Cyber Guardian for the purposes indicated.
- You will be responsible for any false or inaccurate information you provide through the Website and for any direct or indirect damages caused to Cyber Guardian or to third parties.

#### 8. EXERCISE OF RIGHTS

The user can send a letter to one of the addresses indicated in the header of this policy with the reference "Data Protection", attaching a photocopy of his identity document, at any time and free of charge, to:

- Revoke the consents granted.
- Access information about the personal data that Cyber Guardian is processing about you or information about how it is being processed.
- Rectify inaccurate or incomplete data.
- Request the deletion of your data when, among other reasons, the data is no longer necessary for the purposes for which they were collected.
- Obtain from Cyber Guardian the limitation of the processing of data when any of the conditions provided in the data protection regulations are met.
- Oppose processing based on legitimate interest.



• Request the portability of your data when the treatment is based on the consent of the user or on a contractual relationship.

Likewise, if the user considers that Cyber Guardian has violated any of the rights conferred on him by the applicable regulations on data protection, he may file a complaint with the Spanish Agency for Data Protection or another competent control authority in the matter.

## 9. SECURITY MEASURES

Cyber Guardian will treat the User's data at all times in an absolutely confidential manner and keeping the secrecy thereof, in accordance with the provisions of the applicable regulations, adopting the necessary technical and organizational measures to guarantee the security of your data and prevent its alteration, loss, treatment or unauthorized access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed.

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