# **PRIVACY POLICY**

### WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR DATA?

DATA CONTROLLER: TRACKSCO2 SATELITES, S.L.

CIF: B-09944125.

Address: Plaza Pau Vila, 1, Barcelona

• Email: info@tracksco2.com

#### WHAT TYPE OF DATA DO WE PROCESS?

Depending on the services or functionalities you want to enjoy at any given moment, we will need to process different types of data. In general, these data may include, depending on the case, the following:

- Your identifying information (e.g., your name, surname, language, country from which you interact with us, contact details, etc.)
- Economic, financial, insurance, and transactional information (e.g., payment or card data, information about your purchases, orders, returns, etc.)
- Data about your preferences and commercial information

Please note that when we ask you to provide your personal data to grant you access to certain functionalities or services of the app, we will mark some fields as mandatory since we need this information to provide you with the requested service or functionality. If you decide not to provide us with this data, it is possible that you may not be able to complete your registration as a user or enjoy those services or functionalities.

## FOR WHAT PURPOSE DO WE PROCESS YOUR PERSONAL DATA?

Depending on how you interact with our app, we will process your personal data for the following purposes:

- 1. For the development, fulfillment, and execution of the service contract. This purpose includes the processing of your data mainly for:
  - Providing the main service.
  - Contacting you regarding updates or informative communications related to the acquired services, including sending quality surveys about the provided services.
  - Managing the payment of the services you purchase, regardless of the payment method used.
  - Activating the necessary mechanisms to prevent potential fraud against you and us during the purchase process. If we consider that the transaction may be fraudulent, this processing may result in the blocking of the transaction.
  - Post-sale services, supplier management, and service quality.
  - Managing possible returns after a purchase and handling requests for information about the availability of different services.
  - Invoicing and providing you with tickets, invoices, and any other documents proving the payment for your purchases on our Platform.
- 2. To address requests or inquiries made through the various means incorporated into our Platform. We only process the personal data strictly necessary to manage or resolve your request or inquiry.

- 3. For your registration in the app. If you decide to register on our app, we need to process your data to identify you as a registered user and grant you access to its different functionalities and services available to registered users. You can cancel your registered user account by contacting us through info@tracksco2.com.
- 4. For marketing purposes. We will provide information of interest regarding our services or products, and your personal data will be used for periodic sending of newsletters from the company. Remember that you can unsubscribe from the newsletter at any time and at no cost by notifying us at info@tracksco2.com.
- 5. Usability and quality analysis for the improvement of our services (Cookies). If you access our Platform, we inform you that we will process your browsing data for analytical and statistical purposes, i.e., to understand how users interact with our Platform and make improvements accordingly. Additionally, we may carry out actions and quality surveys to understand the satisfaction level of our customers and users and identify areas for improvement.

### WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?

The legal basis for processing your personal data also depends on the purpose for which we process it. Thus, we find different legal bases depending on the following purposes:

- 1. Development, fulfillment, and execution of the service contract. The processing of your data is necessary for the performance of the contract that binds us to you. We understand that the processing of this data is beneficial for all parties involved, particularly for you, as it allows us to implement appropriate measures to protect you against fraudulent attempts made by third parties.
- 2. Customer service. We consider that we have a legitimate interest in attending to the requests or inquiries you make through the various contact means available. We understand that the processing of this data is also beneficial for you as it enables us to properly attend to and resolve your queries. When you contact us, particularly regarding the management of incidents related to the service purchased through the Platform, the processing is necessary for the execution of the sales contract. When your query is related to exercising the rights described below or claims related to our services, the legal basis for processing your data is the fulfillment of our legal obligations.
- 3. For your registration in the app. The legal basis for this processing is your consent when you register on our app.
- 4. Usability and quality analysis. We consider that we have a legitimate interest in analyzing the usability of the Platform and user satisfaction, as we believe that processing this data is also beneficial for you since the purpose is to improve the user experience and provide a better quality service.

## **HOW LONG WILL WE RETAIN YOUR DATA?**

- Development, fulfillment, and execution of the service contract. We will process your data
  for the time necessary to manage your participation in the acquired services and
  subsequently for the legally established periods to fulfill our obligations. In some cases, we
  will only process certain data until you decide otherwise.
- 2. Customer service. We will process your data for as long as necessary to address your request or inquiry.
- 3. For your registration in the app. We will process your data for the duration of your status as

a registered user (i.e., until you decide to unsubscribe). In the event that you do not access the APP within one year, we will understand that you are no longer interested in maintaining your data, and your account will be automatically deleted, subject to the following considerations:

a. If you have an active subscription, we will retain your account. Once the subscription ends, the 1-year period of "last connection" will begin, and when that time elapses, your account will be deleted.

## WILL WE SHARE YOUR DATA WITH THIRD PARTIES?

To fulfill the purposes indicated in this Privacy Policy, it is necessary to grant access to your personal data to third parties that provide support in the services we offer. These third parties are detailed below:

- Financial entities
- Technological and logistics service providers

### WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

We commit to respecting the confidentiality of your personal data and guaranteeing the exercise of your rights.

You can exercise your rights at no cost by sending us an email to our address info@tracksco2.com, simply indicating the reason for your request and the right you wish to exercise. If necessary to identify you, we may request a copy of an identity document from you. Specifically, regardless of the purpose or legal basis for processing your data, you have the right to:

- Request access to your data that we possess.
- Request the rectification of your existing data. Please note that by actively providing us with your personal data through any means, you guarantee that they are true and accurate and undertake to notify us of any changes or modifications to them.
- Request the deletion of your data to the extent that they are no longer necessary for the purposes for which we need to process them, as we have previously informed you, or when we no longer have legal justification for doing so.
- Request the limitation of the processing of your data, which means that in certain cases, you may request that we temporarily suspend the processing of

Finally, we inform you of your right to lodge a complaint with the relevant data protection authority, particularly the Spanish Data Protection Agency (Agencia Española de Protección de Datos) at https://www.agpd.es/portalwebAGPD/index-ides-idphp.php.

### **CHANGES IN THE PRIVACY POLICY**

We may modify the information contained in this Privacy Policy when deemed appropriate. If we do so, we will notify you through various means on the Platform, or even communicate it to your email address when the change is significant for your privacy, so that you can review, assess, and, if necessary, oppose or unsubscribe from any service or functionality.

# **INFORMATION ABOUT COOKIES**

We use cookies and similar devices to facilitate your navigation on the Platform, understand how you interact with us, and, in some cases, show you advertisements based on your browsing habits. Please read our Cookie Policy to learn more about the cookies and similar devices we use, their purpose, and other relevant information.