

- IRIS GLOBAL - Privacy Policy

Processing of personal data

IRIS GLOBAL SOLUCIONES, S.L.U. (hereinafter, "**IRIS GLOBAL**") is the owner of the website www.irisglobal.es and controller of the personal data provided by users through this website in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 (hereinafter, "**GDPR**").

The use of this website is subject to this Privacy Policy, the Legal Notice, and the Cookies Policy. Please read them carefully before providing your personal data.

As a user you are informed and consent to the processing of the data provided while browsing the Website, those generated as a result of the use of the same, and those that you provide through web forms by IRIS GLOBAL for the purposes indicated in the section *For what purposes do we process your personal data and with what legitimacy?* and in accordance with this Privacy Policy. However, if you do not accept the terms of this policy, you should not use the services provided by IRIS GLOBAL.

The user will be responsible, in any case, for the veracity of the data provided, and IRIS GLOBAL reserves the right to exclude from the registered services any user who has provided false data, without prejudice to any other actions that may be applicable by law. In the event that the user provides IRIS GLOBAL with personal data belonging to third parties, they must be duly authorised to do so, and must expressly inform the owners of said data of the rights and/or obligations contained herein, acknowledging the veracity, accuracy, validity, updating, and authenticity of said data.

In this sense, it is expressly stated that IRIS GLOBAL ensures full compliance with Spanish Law 34/2002, on Information Society Services and Electronic Commerce and the GDPR, acknowledging that it has adopted or will adopt all technical and organisational security measures that are mandatory in accordance with the provisions of current legislation in order to ensure maximum security and confidentiality of communications.

Minors under 16 years of age may not use the services available through the Website without the prior authorisation of their parents, guardians, or legal representatives, who shall be solely responsible for all acts carried out through the Website by the minors in their care, including the completion of the forms with the personal data of said minors and the ticking, where applicable, of the boxes that accompany them. In this sense, and to the extent that IRIS GLOBAL does not have the capacity to control whether or not users are under 16 years of age, parents and guardians are hereby warned that they must enable the necessary mechanisms to prevent minors from accessing the Website and/or providing personal data without their supervision, and IRIS GLOBAL accepts no responsibility in this regard.

Information on data protection

Who is the data controller of your personal data?

The information and/or personal data you provide will be the responsibility of:

- **Identity:** IRIS GLOBAL SOLUCIONES, S.L.U. with Tax Identification Number B-87618161
- **Postal address:** Calle Julián Camarillo, 36, 28037, Madrid, Spain.

You can contact our Data Protection Officer at the following address: dpo@irisglobal.es

How do we obtain your personal data?

IRIS GLOBAL obtains your personal data from the following sources:

- Voluntarily provided by the user of this Website as a result of their interactions with the products and services offered.
- As a result of browsing this Website.
- As a result of the development of the contractual relationship, consultation, request, or contracting of any service or product.

For what purposes do we process your personal data and with what legitimacy? What categories of personal data do we use?

1. Management of the contracting of products and services commercially brokered by IRIS GLOBAL.

- **Description of the purpose:** to manage, through commercial brokerage, the contracting of services and the acquisition of products from service and goods providers by the user, including the comprehensive management of repairs, refurbishments, personal assistance, claims processing, and IT services, as well as digital services through a mobile device.
- **Data processed for this purpose:** identification and contact data related to the provision of services; data on transactions of goods and services carried out by IRIS GLOBAL; economic and financial data related to products and services.
- **Basis of legitimacy:** the execution of the contractual relationship between IRIS GLOBAL and the user formalised through the forms made available on this Website.

2. Attention to and management of queries, requests, and complaints.

- **Description of the purpose:** to attend to and manage queries, requests, and complaints made by any means (email, telephone, SMS, etc.) in relation to IRIS GLOBAL products and services.

- **Data processed for this purpose:** identification and contact data related to the provision of services; data on transactions of goods and services carried out by IRIS GLOBAL; economic and financial data related to products and services.
- **Basis of legitimacy:** the execution of the legal relationship established between IRIS GLOBAL and the user or that is established at the time of contact.

3. Preparation of studies on the use of services and quality control.

- **Description of the purpose:** to carry out statistical analyses on the use of the services that IRIS GLOBAL makes available to its users and to evaluate their quality. These studies may involve obtaining inferences based on the calculation of probabilities, surveys on the degree of satisfaction with the products and services offered, analysis of market trends, and service quality control.
- **Data processed for this purpose:** identification data; data relating to personal and social characteristics; transactions of goods and services brokered by IRIS GLOBAL.
- **Basis of legitimacy:** the legitimate interest of IRIS GLOBAL in the continuous improvement of the business model of said entity and the correction of any deficiencies that may be detected in the delivery of services and products. You may request additional information on the justification of IRIS GLOBAL's legitimate interest in the preparation of studies and quality controls by emailing us at dpo@irisglobal.es

4. Prevention of fraud in the contracting of online products.

- **Description of the purpose:** to prevent fraudulent transactions that may occur through the various means of payment accepted on this Website, as well as to process the payment of your purchases.
- **Data processed for this purpose:** identification and contact data related to the provision of services; data on transactions of goods and services carried out by IRIS GLOBAL; economic and financial data related to products and services or means of payment.

- **Basis of legitimacy:** the legitimate interest of IRIS GLOBAL is to ensure the proper use of the contracted services, reduce the risk of being affected by fraud or embezzlement operations. You may request additional information on the justification of IRIS GLOBAL's legitimate interest in preventing fraud in the contracting of online services by emailing us at dpo@irisglobal.es

5. Sending of general commercial communications and/or newsletters.

- **Description of the purpose:** to develop commercial actions in general and, in particular, to offer and recommend to the IRIS GLOBAL user products and services adapted to their personal characteristics and preferences, as well as to send periodic commercial information about IRIS GLOBAL products and services or activities carried out by IRIS GLOBAL or third parties. The contact channels for these commercial communications may be by post, email, or telephone (SMS). In order to increase the efficiency of these mailings, profiling and segmentation techniques will be applied to improve communications and increase the degree of personalisation of the offer.
- **Data processed for this purpose:** identification and contact data; data relating to personal and social characteristics; transactions of goods and services brokered by IRIS GLOBAL.
- **Basis of legitimacy:** the consent we have requested from you and IRIS GLOBAL's legitimate interest in arousing interest and encouraging the contracting of the products and services made available by IRIS GLOBAL. You may request additional information on the justification of IRIS GLOBAL's legitimate interest in sending commercial communications by emailing us at dpo@irisglobal.es

To which recipients will your data be communicated?

In relation to the processing of data for the aforementioned purposes, the data may be communicated to the following recipients:

- Competent national or international authorities, including judicial bodies, regulatory and supervisory bodies, and law enforcement authorities.
- Other entities belonging to the SANTALUCÍA Group, subsidiaries and/or affiliates, in the event that the user gives their consent <https://www.santalucia.es/sobre-santalucia/empresas-del-grupo.html>
- Third-party entities collaborating in the provision of services offered through IRIS GLOBAL.

Additionally, please note that the provision of the services made available through this Website requires the intervention of third-party service providers (for instance, web hosting and infrastructure, customer management tools, etc.) who will process your personal data under our responsibility, on our behalf, and following our instructions.

What is the retention period?

Personal data will be retained for as long as is necessary to fulfil the purpose for which it was collected and to determine any liabilities that may arise from that purpose and from the processing of the data, as long as your consent is not revoked or you do not exercise any of the rights set out in the data protection regulations in force.

What are your rights when you provide us with your data?

IRIS GLOBAL informs you that you have **the right to access** your personal data and obtain information on how they are being processed. Likewise, you have the right to request the **rectification** of inaccurate data or, where appropriate, request its **erasure** when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

We remind you that you have the right to **object**, at any time, to the processing of your data and IRIS GLOBAL will stop processing the data, except for overriding legitimate reasons or to ensure the defence of possible claims.

In addition, you may also request the right of **portability** and obtain for yourself or for another service provider certain information in electronic format.

In certain circumstances, you may request the **restriction of the processing of your data**, in which case IRIS GLOBAL will only keep them for the exercise or defence of possible claims.

The data subject has the right to **withdraw consent** at any time, without affecting the lawfulness of the processing based on the consent prior to its withdrawal.

The only commercial communications that will be sent by email will be those that have been expressly consented to or authorised by the recipients in accordance with Spanish Law 34/2002, of 11th July, on Information Society Services and Electronic Commerce, except for the provisions of article 21.2 of Spanish Law 34/2002, on Information Society Services and Electronic Commerce in the text given by the Second Final Provision of the Spanish General Telecommunications Law, that is, when there is a prior contractual relationship.

The data subject may exercise such rights or express their wish not to receive future electronic commercial communications from IRIS GLOBAL by the following means:

- Post, with the subject "Data Protection Rights Request" to Calle Julián Camarillo, 36, 28037, Madrid, Spain.
- Email: dpo@irisglobal.es

Proof of identity of the person exercising their rights must be provided by sending a copy of their National ID, foreign resident card, passport, or equivalent document, on both sides.

IRIS GLOBAL will provide the information within a maximum period of one month from receipt of the request. This period may be extended by two months if necessary, considering the complexity and number of requests.

If you do not agree with the way in which your information is used or with our response to your exercise of any of these rights, you may refer the matter to the competent data protection Supervisory Authority if you believe that we have committed a breach. However, in the first instance, you may lodge a complaint to the Data Protection Officer at the address provided above.

For further information about your rights, please visit the website of the Spanish Data Protection Agency (<https://www.aepd.es/>).