

PRIVACY AND COOKIES POLICY AS REGARDS THE PROTECTION OF PERSONAL DATA

In this section we explain our PRIVACY AND SECURITY POLICY AS REGARDS THE PROTECTION OF PERSONAL DATA. Likewise, we inform you of your rights and show you the security measures we apply to the data you provide us with when you visit our websites or as a result of subsequently hiring our products or services, or for any other valid reason.

You will be immediately notified of any change in our policy as well as any updates published on our websites.

Who is in charge of processing your data?

The responsible party for Personal Data Processing is: Vector Software Factory, S.L. Tax Code: B-83209015

Registered address: Camino Cerro de los Gamos 1, edificio 6, planta 1. PC 28224 Pozuelo de Alarcón-Madrid. Telephone: 911830300.

Postal address: info@vectoritcgroup.com, dpo@vectoritcgroup.com

Web: <http://www.vectoritcgroup.com>

Contact information

VECTOR provides you different means of contact as regards any enquiries you have in terms of privacy.

You may contact us at the addresses included in the previous section or do so by means of our Data Protection Director at the email addresses given below: dpo@vectoritcgroup.com.

Likewise, you can contact us by telephone or by the website in the “contact section” according to your preferences.

What are our principles when processing personal data?

Respect for your privacy is taken very seriously at VECTOR, so we wish to be totally transparent with you in terms of the processing we may carry out with your personal data, so that you may make informed decisions on this. Therefore, we ask you to take your time to read this Privacy Policy.

The main goal of this Privacy Policy is to ensure total compliance with the legislation in force on data protection and privacy and that your personal data is processed safely.

When processing the personal data, you have provided, VECTOR, is influenced, amongst other matters, by the Principles of Transparency, Legality, Proactive Responsibility, Minimal use of data, Pseudonymization and Removal.

Why do we process your personal data?

VECTOR will use your personal data for the following purposes:

1. To process your data according to the consent you have given us when VECTOR does not act on any other legal basis. This may be for the dispatches of advertising from third parties, which VECTOR has business agreements with, processing your browsing details, invoicing for business purposes or using anonymous and aggregate data created from yours in order to analyse information (Big Data). In any event, you may always revoke the consent you have given.
2. To provide services and products from our company, sign contracts and enable them to be executed subsequently. The data processing to be carried out may vary according to the product or service concerned. This enables us to provide you the best service for what you have requested and to also send you information about it and in line with your purchasing interests according to your visit to our website. We also need to check credit data in order to permit you to hire our services or products and /or to collect debt in the event of defaulting.
3. To satisfy the legitimate business interests of VECTOR, such as, fraud prevention, ensuring the security of our network and services, dispatches of marketing messages about our products and services, and improving our services. To this end, we may draw up a profile for you. In these events, we always evaluate our business interests to ensure they do not clash with your rights. Moreover, in certain events, you will be entitled to forbid such processing. In this policy, we have gathered all the rights that afford you protection.
4. To comply with a legal duty, such as, for example, to comply with our fiscal and accounting obligations, or retain your traffic data in order to comply with legislation in force on data conservation, amongst other matters.

In accordance with the purposes expressed, your personal data will be used for:

Regarding your orders:

- ✓ To process the order from your products and services you have bought and to enable you to track your order.
- ✓ To provide you the corresponding product or service. This may cover third party services not included in your contract with us.
- ✓ To invoice you or charge you for our product and services.

- ✓ To contact you if the invoicing information you have given us is not up-to-date, is about to expire, or if we cannot accept the payment.
- ✓ To respond to any enquiry or question you may have about our company, product or services.

Information messages:

- ✓ We will contact you to keep you up-to-date with information about the products and services you have with us. For example, changes in our terms and conditions or any interruptions to the service.
- ✓ We gather anonymous information, which is not associated with you individually and has been aggregated in order to improve the service.

Marketing Messages

- Marketing and Creating Profiles
 - ✓ In the event you are our client, VECTOR has a legitimate interest in keeping you up-to-date on our new products and services. We adapt our messages according to the types of products and services you have hired.
 - ✓ We may send you news bulletins, invite you to take part in a survey or inform you about prize draws or competitions, if applicable.
 - ✓ We may customize these messages even more by using information connected to the use of services providing that you have expressly given us your consent for.

 - Online advertising
 - ✓ In order to provide you with relevant publicity, you will be able to see targeted advertising on line based on the use of cookies. This may be given on our website, on the websites of companies in the VECTOR consortium, or from organizations and other online media such as social networks. We can also combine the data gathered by cookies with other data collected. If you do not wish for us to use the information we gather from cookies, please consult our Cookies Policy to exclude it.

 - Research and analysis (Big Data).
 - ✓ By means of “Big Data” techniques, large quantities of data are analysed in order to find patterns
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and trends which have not been revealed, with total compliance with the law and the principle of transparency.

In this analysis, we will just use anonymous and aggregate data, so it will not be possible to link this information to any of our clients. By means of this analysis, we provide aggregate and anonymous reports to third parties. However, you may, at any time, express your wish that your data is excluded, bearing in mind any BIG DATA initiatives. To do so, write to the address: dpo@vectoritcgroup.com.

How long will we keep your data for?

The data provided will be maintained until you request we delete it. All our marketing messages include the possibility of deregistering from the file created by Vector. If you run the option "deregister" your data will be removed from the file created by our general marketing messages.

As a rule of thumb, your data will be encrypted and protected for at least the period established by law, as long as you remain a client of VECTOR and for six years after you cease to be one.

For what reasons do we process your data?

- ✓ You register on our systems to request information about a specific product or service or to hire or use it.
- ✓ You buy or use any of our products or services.
- ✓ You subscribe to bulletins, messages or other services.
- ✓ You contact us by means of any of our channels of communication.
- ✓ You participate in a competition, draw or survey.
- ✓ You visit or browse our website or other websites in the VECTOR consortium.
- ✓ You have given your permission to third-party companies, such as our collaborators or suppliers to share your information with us.
- ✓ Your information is publicly available and it is legal to use it.
- ✓ You are a client of a business or institution we have taken over.

We use cookies to improve your user experience, to exclude these options and to know how we use them, click on the "[cookies policy](#)".

Information we collect:

The information that Vector collects, once we have gained your consent and agreement with the different purposes specified, is:

- ✓ Your name, address, telephone and/or mobile number, date of birth, sex and email address.
- ✓ Your credit or debit card information, or your bank account and other banking data.
- ✓ The data obtained when you contact us and in which a call to one of our centers is recorded, whether you use live chat for trouble shooting, you send an email or a letter, or any other contact with us that

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has been registered.

- ✓ Your customer account information, and the payment dates for pending or received invoices, dates for registration and deregistration from our services and subscriptions to the services you use.
- ✓ Your credentials such as passwords and usernames to access our accounts and services.
- ✓ Your preferences for certain products, services and lifestyle activities, in the event you inform us of these.
- ✓ Your browsing history. If you have given your permission for this, Vector will gather the categories of the website you have browsed with your mobile PC or other devices. We use this information to send you customized marketing messages and show you customized advertising, provided you have given your consent for us to do so.
- ✓ The information we obtain from other sources, such as credit agencies, fraud prevention agencies and other data providers. This includes demographic data, data based on interests and Internet browsing behaviour.

We neither collect nor process any information about minors, nor any information about health, sexual orientation, trade union affiliations, religion or race, that may be classified as being sensitive.

To whom will your data be communicated?

The personal data whose processing you have entrusted us with will be sent to the following institutions:

- ✓ Companies in the VECTOR consortium, mainly for internal reports.
- ✓ SUPPLIERS involved in distributing the products and services you have requested or used.
- ✓ Companies which VECTOR has hired or collaborated with when providing the services.
- ✓ Credit reference, fraud prevention or business ratings agencies, or any other type of credit rating agency.
- ✓ STATE, PROVINCIAL OR LOCAL PUBLIC ADMINISTRATIONS or any other authorities for complying with duties or legal authorizations.
- ✓ Third parties to which disclosure of this data is necessary for complying with the law or any other legal or court requirements;

When you purchase a product or service from a third party by means of Vector, the contract is with the third party that sells that product or service. Vector must provide certain personal information to this third party to complete the purchase with them. The terms and conditions of the seller, as well as its privacy and cookies policy will be those applicable when processing your personal information.

What rights do you have when you give us your data?

You have the right to access your personal data, as well as to request any inaccurate data be rectified, or, if necessary, request they be deleted.

In certain circumstances, you may request that the processing of your data be restricted, in which event, we will just keep them to deal with complaints, or defend ourselves from them.

Likewise, and as a result of your situation, you may challenge any processing carried out to your data. VECTOR will cease to process data, except for overriding legal reasons, or to deal with or defend ourselves against potential complaints.

You are entitled to have portable personal data.

Exercising said rights must be carried out in writing addressed to the head of processing at the following address: dpo@vectoritcgroup.com

In this notification you must provide a copy of your Identity Card or a valid passport in order to show you are the owner of the data. Vector will respond within a month, unless due to the complexity or volume of requests received, this response time needs to be extended for up to a maximum of two months more, in which case, you will be duly informed as to why this extension is necessary within 30 days of the request for exercising your rights.

Likewise, you are entitled to file a complaint before the authorized body (The Spanish Agency for Data Protection) if you consider that any processing does not comply with the legislation established by the GDPR.

Are your personal data secure?

In order to ensure your personal data is secure, we can inform you that we have adopted the necessary technical and organizational measures for protecting any personal data provided against alteration, loss, wrongful use, disclosure and unauthorized processing or access, bearing in mind any inherent risks to processing the category of data, as required by the law on personal data protection law. We hereby inform you that our services suppliers, and the institutions entrusted with processing, have, likewise, adopted reasonable and appropriate measures in terms of providing effective protection to the personal data you have provided us with.

International Transfers of Data

We may need to transfer your information to other companies within the Vector consortium or to different services suppliers in countries outside the European Economic Community (EEC). The EEC is made up of the countries belonging to the European Union, as well as Switzerland, Iceland, Liechtenstein and Norway, which are deemed to have equivalent laws in terms of data protection and privacy. This type of data transfer may occur if our servers (that is, where we store data) or our services suppliers are outside the EEC, or if you use our services and products for visits to countries outside the EEC.

If VECTOR sends your information to a country outside the EEC, we assure you that your information will be adequately protected. We always ensure there is an appropriate contract which covers data transfer. Moreover, if a country is not deemed to have laws equivalent to the EU data protection standards, the third party will be required to sign a legally binding agreement which reflects these standards. Likewise, whenever necessary, we will request beforehand, authorization from the Spanish Data Protection Agency for making international transfers.

Approval, coming into effect and updates

All pertinent parties will be informed of the Policy within the agreement and this will be at their disposal for any consultation. The Policy will be periodically reviewed at least once a year, so that it adapts to the purposes of VECTOR, and, extraordinarily, when there are changes to its strategic objectives or in the legislation applicable in terms of the protection of personal data.

This policy was approved as of 11th of May 2018.