

## COOKIES AND PRIVACY POLICY

### 1. INTRODUCTION

The present Policy on Privacy and cookies (hereinafter, the "Privacy Policy") provides detailed information on how estudioHerreros SLP uses and protects your personal data, as well as your rights to this concern.

This Privacy Policy applies to the processing of personal data provided by you or that we obtain from you when you access and use the Website, purchase our products or services, request information from us, contact us, apply for a professional position or make use of the features and services available on the Website.

estudioHerreros SLP respects your right to privacy and complies with the current legislation on personal data protection, including Organic Law 15/1999 of 13 December on the Protection of Personal Data, its implementing regulations and any other regulations that may amend, supplement or substitute the Act in the future, as well as with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), applicable from 25 May 2018, as well as any other rules that may develop or supplement it in the future.

We recommend that you carefully review our Privacy Policy to ensure that you understand how your personal data are to be used.

### 2. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?

The data controller is the legal entity that determines the purposes and means of the processing of personal data. In other words, the controller decides how and for what purposes personal data are processed.

For the purposes laid out in this Privacy Policy, the personal data controller is estudioHerreros SLP, with registered office at c/ Boix y Morer 6, 8º, Madrid and with Tax Identification Code [CIF] B581796, registered in the Commercial Registry of Madrid, at Volume 32321, Folio 73, Section 8, Sheet M-581796, first entry.

### 3. WHO CAN YOU CONTACT AT estudioHerreros SLP REGARDING PROTECTION OF YOUR PERSONAL DATA?

If you have any questions or wish to receive more information regarding the processing or the protection of your personal data, you may contact us via any of the following:

Data controller: estudioHerreros SLP  
Postal address: C/ Boix y Morer 6, 8º izda of Madrid (Spain)  
Telephone: +34 911 781 998  
Email: estudio@estudioherrerros.com

### 4. WHAT IS PERSONAL DATA?

Personal data is any information relating to an identified or identifiable natural person.

### 5. WHAT PERSONAL DATA ARE PROCESSED BY estudioHerreros SLP?

For the purposes laid out in this Privacy Policy, estudioHerreros SLP may compile and process the following personal data:

- a) Identifying data, name, surname, identification document (tax identification number or code, foreigner identification number, passport or residence permit).

- b) Contact information: postal address, email address, landline telephone number, mobile telephone number.
- c) Contractual information: information on purchases, orders, contracts, invoicing and collection, means of payment, bank details and any other data related to your transactions with us.
- d) Electronic data: IP address, type and identification of device, type and language of browser, domain through which the Website is accessed, browsing information, activity on the Website.

## 6. COLLECTION OF PERSONAL DATA.

estudioHerreros SLP collects and processes personal data that you voluntarily provide us, in particular:

- when requesting us information on our products and services;
- when subscribing to our *Newsletter*;
- when registering in our Website;
- when purchasing products or services of estudioHerreros SLP;
- when sending us your CV with the aim of taking part in staff recruitment processes.

You are bound to provide only personal data that is necessary so that estudioHerreros SLP can provide services or make available features of the Website that you request.

For example, if you wish to receive estudioHerreros SLP's newsletter, it will be necessary that you provide us with your email address. If you request information from us or if you wish us to contact you, you must provide us with the necessary contact information.

In any event, you guarantee and are liable for the truthfulness, accuracy, validity and authenticity of the personal data provided and undertake to keep them up to date.

It is not necessary to provide us with your personal data to browse the Website. However, when visiting our Website, depending on the specific configuration of your browser, estudioHerreros SLP automatically collects, through cookies and other tracking technology as well, the following information: IP address, type and identification of device, browser type and language, domain through which the Website is accessed, browsing information, activity on the Website. For further information, you may consult section 13 of the Privacy Policy "**Use of cookies and other tracking technology**".

## 7. WHAT DO WE USE YOUR PERSONAL DATA FOR? PURPOSES AND LEGAL GROUNDS FOR DATA PROCESSING

In general, the personal data you provide to us and we obtain from you are used to process your requests, to provide you with high-quality service, to inform you of opportunities we believe may interest you as well as to manage your account. The specific purposes for processing your personal data are the following:

- a. To process any request, the legal grounds for the processing is fulfilment of the agreement between estudioHerreros SLP and you (this is, the terms and conditions of the rendering of the service);
- b. To process your transactions and means of payment, to comply with our legal obligations concerning fraud and money laundering prevention; in this case legal ground for data processing is fulfilment of the agreement between estudioHerreros SLP and you when estudioHerreros SLP takes part in the management of your transactions and payments, and/or compliance with legal obligations under Act 10/2010, of 28 April, on money laundering and terrorism financing prevention.
- c. To manage your taking part as candidate in staff recruitments processes: with the purpose of offering you job opportunities that better match your profile, we have to process certain information on you. To this purpose, we shall only ask you on those data that can better help us to select your profile, such as your name, age, contact information, education, career and social

security number (you may as well chose to share with us any other information of interest). Where applicable, and according to law and local requirements, we might as well get information concerning your health or related to diversity. The legal basis of the treatment will be your consent.

- d. If you accept, to send you marketing communications, and to this purpose we shall process your data to send you our publications, events or projects (in this case the processing is grounded on your consent and on the legitimate interest of estudioHerreros SLP, concretely on its interest in sending you personalised offers, better understanding your needs and offering you tailored products and services);
- e. To ensure the security of our website and communication networks, (in this case, processing is grounded on the legitimate interest of estudioHerreros SLP in continuously improving its Website and its services and in understanding the needs of the user to be able to meet their expectations).
- e. Bear in mind that receiving promotional information is not essential to maintain the relationship we have with you.

To what extent are decisions automated?

estudioHerreros SLP does not use completely automated decision-taking processes to engage in, develop or terminate a contractual relationship with you. If we were to use these processes in a specific case, we would keep you informed and we shall notify you of your rights in this respect in accordance with law.

## **8. WHO WILL WE SHARE YOUR PERSONAL DATA WITH?**

We only use, transfer or share personal data with third parties in the terms laid out in the Privacy Policy. estudioHerreros SLP does not sell or rent your personal data to third parties and only transfers them to persons or companies if we obtain your prior consent or pursuant to or in accordance with applicable legislation when said consent is not necessary for a specific transfer.

We will share or give third parties access to your personal data when necessary to achieve one of the objectives described below and in accordance with current legislation:

a. Our suppliers . estudioHerreros SLP shall transfer or allow access to your personal data to companies that provide services under contract, when it is necessary to achieve one of the purposes described in the previous section. If any of these service providers needs to access your personal data, they will use it only to provide us with a service and according to our instructions. We also require them to keep the data confidential and safe and to return or destroy the data when they no longer need it.

b. Legal obligations: estudioHerreros SLP may transfer your personal data when any such transfer is authorised by law or necessary to comply with a legal obligation, including transferring your data to competent authorities, judges and courts. This includes complying with requests made by authorities in accordance with Act 10/2010 of 28 April on money laundering and terrorism financing prevention.

c. International transfer of data. Your personal data shall not be transferred outside the European Economic Area (hereinafter EEA). If, in order to comply with the purposes described in the present Privacy Policy, it were necessary to transfer your personal data to countries where the level of protection might not be the same as in Spain, estudioHerreros SLP shall duly inform you and comply with any applicable legal provision, requesting your consent or offering you adequate assurances.

## **9. WHAT MEASURES DO WE APPLY TO KEEP YOUR PERSONAL DATA SAFE?**

estudioHerreros SLP takes the appropriate organisational and technical measures in accordance with current regulation to protect your personal data against any misuse, destruction, loss, accidental or illicit modification, disclosure or unauthorised access, including measures necessary to deal with any suspected data infringement.

## 10. HOW LONG DO WE KEEP YOUR DATA FOR?

estudioHerreros SLP shall keep your personal data for the time necessary to fulfil the purposes for which they were gathered, provided that you do not exercise your right to have your data erased.

If the data are no longer necessary for the purposes for which they were gathered, they shall be deleted unless it is temporarily necessary to continue to process them to comply with a legal provision.

Likewise, your personal data shall be eliminated if you withdraw the consent you gave, except where one of the exceptions provided by law is applicable.

To determine an appropriate period to keep your data, we apply the following criteria:

- a) Any data necessary to provide you with the information you request, including estimates of products and services, shall be kept during the time it is necessary to meet and to process said requests, in accordance with applicable legal provisions and terms of prescription of any legal claim.
- b) Any data necessary to send you the Newsletter or promotional communications shall be processed so long as you do not withdraw your consent and you inform us of your wish not to continue to receive them, in accordance with applicable legal provisions and terms of prescription of any legal claim.
- c) Data related to the purchase of products and services under a contractual relationship shall be kept for the term of the agreement, in accordance with applicable legal provisions and terms of prescription of any legal claim.
- d) Data sent to participate in staff recruitment processes shall be generally kept for 3 years, in accordance with applicable legal provisions and terms of prescription of any legal claim.
- e) When cookies are placed on your device, data shall be kept in accordance with applicable legal requirements and recommendations made by the competent authorities.

## 11. WHAT ARE YOUR RIGHTS WITH RESPECT TO THE PROCESSING OF YOUR PERSONAL DATA?

In accordance with applicable law, you have specific rights with reference to the collection and processing of your personal data. Exercising these rights shall be free for you, except where manifestly unfounded or excessive requests are made, especially when made repetitively.

These rights are the following:

- a) **Right to be informed:** You have the right to be informed about the use and processing of your personal data in a concise, transparent, comprehensible and accessible manner in a clear and simple language.
- b) **Right of access:** You have the right to request from us, any time, that we confirm if we are processing your personal data, that we provide you with access to said data and to the information about their processing and to get a copy of said data. Any such copy of your personal data shall be free although the request for additional copies could be subject to a reasonable fee based on administrative costs. On our part, we shall be able to request that you give proof of your identity or ask you for more information necessary to handle your request.
- c) **Right to rectification:** You have the right to request the rectification of inaccurate, outdated or incomplete personal data that concerns you. You may also request that any incomplete personal data be completed, even through an additional statement.
- d) **Right to erasure:** You have the right to request your personal data to be erased when, among other reasons, the data are no longer necessary for the purposes for which they were collected. However, this right is not absolute so that estudioHerreros SLP may continue keeping them duly blocked in the cases provided for by applicable law.

- e) Right to restrict processing: You have the right to request that we restrict the processing of your data which means that we may continue storing the data but may not continue to process them provided that one of the following conditions is met:
- that you contest the accuracy of the data, during a period of time that allows the controller to verify the accuracy of said data;
  - the processing is unlawful and you opposed to erasure of data and request instead restriction of their use;
  - estudioHerreros SLP no longer needs the data for the purposes of processing, but you need them to make or defend against claims;
  - You have objected to the processing, pending the verification whether estudioHerreros SLP's legitimate grounds override yours.
- f) Right to data portability: You have the right to have your data transferred to another data controller in a structured, commonly used and machine-readable format. This right is applied when the processing of your personal data is based on consent or on the execution of an agreement and said processing is automated.
- g) Right to object: This right allows you to object to the processing of your personal data, which includes profiling. We shall not be able to comply with your right only when we process your data if we prove compelling legitimate grounds for the processing or for filing, exercising or defending claims.
- h) Right to withdraw consent: You shall be able to withdraw your consent at any moment in cases in which we have obtained your consent to process your personal data in connection with certain activities (for example, with the aim to send you marketing information). We shall stop performing this specific activity to which you consented previously, unless there is another reason that justifies continuing to process your data for these purposes, in which case, we shall notify you of this situation.
- i) Right to bring a claim before a control authority: You have the right to bring a claim before the Spanish Data Protection Agency, whose information may be found at the following website (<http://www.agpd.es>).

You may send us a communication to [estudio@estudioherrerros.com](mailto:estudio@estudioherrerros.com), attaching a document proving your identity and providing the necessary details to process your request.

## 12. USE OF COOKIES

Cookies allow us to, among other things, remember your preferences and recognise you on future visits. This is done by storing certain information on your computer. Some cookies are used by estudioHerreros SLP and by our suppliers.

### **What is a cookie?**

A cookie is something that is downloaded to a user's computer with the aim of storing information that can be updated and recovered by the organisation responsible for its installation.

Cookies form part of the Website. When you access the Website, the browser creates small files on your device (computer, tablet, mobile phone, etc.) with information necessary for the Website to work. These files (which are the cookies) form part of the technology necessary to make the Website work properly and are not inherently harmful.

Your browsing history and cookies are stored on your device. Cookies, like browsing history or cache memory are a trace of your internet activity.

This is important if other people access your device. If you are using a shared device, we recommend that you erase your browsing history, cache and cookies when finished.

If you are concerned about your privacy, you can completely disable cookies in your browser's settings. You can disable cookies, but the Website or some of its sections might not work correctly.

## **What type of cookies do we use?**

Depending on the organisation that manages them, cookies can be:

- An organisation's own cookies: these are cookies that are sent to the data subject's device from a computer or domain managed by the publisher and from which the service requested by the user is offered.
- Third-party cookies: these cookies are sent to a user's device from a computer or domain that is not managed by a web publisher, but by another organisation that processes data obtained from cookies.

estudioHerrerros SLP uses both its own cookies as well as third-party cookies to improve our services and show advertising related to your preferences through an analysis of your navigation habits.

Cookies according to the duration they are enabled:

- Session cookies: these are a type of cookies designed to collect and store data while the user browses a webpage. They are often used to store information that is only useful to offer a service requested by the user just once (e.g. a list of products purchased).
- Persistent cookies: these are a type of cookies in which data remains stored on the device and can be accessed and processed during a period of time set by the organisation responsible for the cookies, which could be from a few minutes to years.

EstudioHerrerros SLP uses both persistent and session cookies. The cookies we use only store the ID of the user. That's to say, their email (encrypted).

## **What are the Website cookies used for?**

Technical cookies: these cookies allow the user to browse a webpage, platform or application and to use different options or services. For example, they can control traffic and communication of data, identify a session, access restricted areas, remember an order, make a purchase, register for or participate in an event, use security features while browsing, store content to share videos or audio or share content through social networks.

- Personalised cookies: these are cookies that allow the user to access a service with some general predefined characteristics according to some criteria on the user's device. For example, language, type of browser, regional configuration, where the user is accessing from, etc.
- Analytical cookies: these are cookies that enable the controller of the cookies to monitor and analyse behaviour of the user of the websites to which the cookies are linked. The information collected from these types of cookies is used to gauge the activity of websites, apps and platforms and to make navigation profiling of the users of said sites, apps and platforms, with the aim of making improvements based on user data analysis.
- Advertising cookies: these are cookies that allow for the most efficient management of advertising space, which the publisher has included on a webpage, app or platform and from which the requested service is offered based on criteria such as the published content or the frequency at which the advertisements are shown.
- Behavioural advertising cookies: these are cookies that allow for the most effective management possible of advertising space which a web editor has included on a webpage, app or platform from which the service requested is offered. These cookies store behavioural information of users obtained through continued observation of their browsing habits. This allows for specific profiling to show tailored advertising.

Cookies	Domain	Function	Persistency	Cookie type
<b>_ga</b>	estudioherrerros.com	It is a google analytics cookie that uses an anonymous identifier to distinguish anonymous users. This cookie analyses the interactions of users, in order to optimize the services they offer.	2 YEARS	ANALYTIC
<b>_gid</b>	estudioherrerros.com	It is a google analytics cookie that is used to distinguish users.	24 HOURS	ANALYTIC
<b>_gat</b>	estudioherrerros.com	It is a google analytics cookie that is used to differentiate between the different tracking objects created in the session. The cookie is updated each time you send the data to Google Analytic.	_10 MINUTES	ANALYTIC
<b>qtrans_front_language</b>	estudioherrerros.com	It is used to recognise the language in which you are browsing.	1 YEAR	TECHNICAL

**How can I disable cookies?**

You may adjust your browsers settings to reject all cookies. However, it is possible that some features or services of the Website will not work properly without cookies. The majority of browsers allow you to completely disable cookies so that you may at any moment choose what cookies you would like to work on the Website by adjusting your browser's settings. You can find more information in your browser's settings. Below, we provide you with some links to some of the main browsers:

- [Apple Safari\\*](#)
- [Google Chrome\\*](#)
- [Microsoft Internet Explorer\\*](#)
- [Mozilla Firefox\\*](#)

**13. AMENDMENTS**

estudioHerrerros SLP may amend the Privacy Policy to adapt it to the amendments that there might be in the Website or in relation to the processing of your personal data. In that case, estudioHerrerros SLP will contact you through the usual communication channels and well in advance to notify you the appropriate amendments and will send you the updated privacy policy.

The updated and prior versions of the Privacy Policy may be found at any time on the Website.