

Privacy Policy. V.1.0.1

July 2022

In compliance with EU General Data Protection Regulation (GDPR, 679/2016/UE), we provide you with the following information about the processing of your personal data on our website.

STELLA consultancy is the owner and, therefore, responsible for the projects indicated below, including any of their subdomains or sections (hereinafter, "Website" as corresponds):

- www.ingeniums.nl

In this legal document, the legally obligatory information on the processing carried out on your personal data in the context of our Website is provided: browsing the Website; user registration (subscription).

The present Privacy Policy regulates the processing of your personal data performed by STELLA consultancy, collected through the use of the services offered on the Website (hereinafter, "Services").

The latest update of this Privacy Policy is indicated at the top of this text and it will become effective immediately upon being posted. STELLA consultancy, thus, recommends reviewing this Privacy Policy from time to time.

Some of the Services offered on the Website may be subject to specific privacy policies that will be displayed in the relevant moment. Additionally, the access and use of the Website and the accompanying Services are governed by the Terms of Use of the Website.

PERSONAL DATA PROCESSING

The following sections address the collection and processing of your personal information through any of the projects run by STELLA consultancy, including any of their subdomains and sections.

1. Data controller

STELLA consultancy, as data controller, is responsible for the processing of Users' personal information on the Website:

STELLA consultancy

Data Protection Officer

You can send an email to info@ingeniums.nl to raise any questions, request or exercise of right regarding personal data protection.

2. Website Use under Terms and Conditions

You can only subscribe our services and validly consent to our Terms of Condition if you are of legal age.

3. Our purposes and lawful basis of data we collect

Your personal data is processed with different purposes. Each processing must be based on a lawful basis, among those set forth by the regulation. We use the following basis:

1. **Consent:** you have given your informed, unequivocal and specific consent to the processing of your personal data aimed to a specific purpose.
2. **Execution of a contract:** the data are strictly necessary to provide you with our services or to comply with what was agree with you.
3. **Our legitimate interests,** provided that your interests and rights do not prevail over them.

The legal bases of our data processing carried out through our Website, in relation to the purposes for which we will use your data, are the following:

3.1. Browsing the Website

When you browse and use the Website, even if you do not register, data is automatically collected through technology or automated interactions, such as IP address, device id, certain metadata (http header, your browser, etc.).

Personal data processed: IP address, device id

3.2. Contractual relationship with our registered users (and private use)

When you register as a user (subscription), we request the personal data that we need for the management and fulfillment of our **contractual relationship** with you.

We do not request, collect or process any special categories of personal data (those that reveal ethnic or racial origin, political opinions, religious or philosophical convictions, union membership and information on health, orientation and sexual life, genetic or biometric data).

When you are requested to provide personal data identified as necessary, due to legal obligation or in accordance with our contracting conditions, and you refuse to provide them, we may not be able to formalize said contract or provide the service, which will be communicated to you properly.

- **Personal data processed (private use):** the email address is required only in case if choosing this service.
- **Personal data processed (subscription):** the above, plus country, city of residence, identity document, company information, and means of payment (all data are mandatory).

3.4. Personalized advertising on other websites

We promote our products:

- **with social networks and other platforms users**, using audience segmented by interests, not created by STELLA consultancy but already offered by platforms such as Google. Likewise, we can only identify you if you subscribe as a user.

Personal data processed: We do not process personal data: we select the groups of users to whom advertising will be displayed based on the segments offered by the platforms, such as age ranges, country, etc. These platforms provide us with aggregated information about the performance of each campaign, but we cannot identify the specific users who have registered as a result of it.

- through **retargeting**: impacting visitors who have visited and left our Website without registering, when they have accepted the use of our cookies, and these allow us to display advertising to them on third party websites.

3.5. Sending of commercial communications by email

We will send you electronic commercial communications if you have registered or subscribed to the Website Services, you request information about our products through any of the forms for this on the Website. In any case, we will do so as long as you have not expressed your willingness to stop receiving such communications (you can do so comfortably in your user profile).

Our legal basis is our **legitimate interest** (to offer you commercial information about products or services similar to those that you have already contracted or about which you have requested information), by

virtue of art. 21.2 of Law 34/2002 of July 11, of Information Society Services and Electronic Commerce (LSSI).

3.6. Advertisements on our Website

We will display only non-personalized advertisements on our Website.

3.7. Surveys

Likewise, based on our legitimate interest to know your opinion in order to improve our products' performance and usability, we may contact you to request your opinion through satisfaction surveys.

Personal data processed: contact information.

3.8. Support requests

When you contact us requesting information or support, we process your data in order to assist you, based on your **consent** expressed in your own request.

Personal data processed: contact information that you provide us with in order to respond to your request.

3.9. Legally binding processing.

When in some cases we are **legally bound** by different regulations (regardless of whether or not you give your consent), to process and / or transfer certain personal data to different entities. For example, to the Tax Authority, or the law enforcement authorities, at their request.

Personal data processed: those set forth in the applicable regulations.

4. For how long do we keep your data

Obtained data is not stored and saved, it is one-time use with the option to print or email the results to a specified email address.

5. Disclosure of data

STELLA consultancy does not transfer nor share personal data with third parties external to the company.

We may disclose personal information of our Users to third parties only in cases when it is strictly necessary for STELLA consultancy to perform their functions and to comply with the Terms of Use. We may also share personal information with other third parties to ensure compliance with applicable laws, including:

- Service providers, to manage systems and information technology such as hosting, broadband, IT security or web analytics providers.
- Payment platforms / gateways, banks and companies involved in the transaction process, to ensure the fulfilment of the necessary transactions.
- Advertising platforms, CRM and other marketing tools.
- Lawyers, auditors, legal and accounting consultancy services and financial institutions.

These services provided by third parties are necessary for the development of STELLA consultancy business activity. The processing of personal data is at all times subject to a contract which establishes the duties of the data processor towards the data controller (us). Under no circumstances will personal information be used for other purposes and it will be managed in compliance with STELLA consultancy policy guidelines, their privacy policy and the applicable data protection regulation.

In accordance with our commitment to your privacy and your data protection right, we exclusively choose only top-tier service providers, leaders in their respective sectors. You can request the list of providers that

have access to your personal data, as well as the services provided by each one, through the email address provided in the exercise of rights section.

7. Rights of the user

We guarantee the exercise of rights established in the General Data Protection.

Please note that STELLA consultancy may require you to verify your identity before taking action on the request for the exercise of rights.

You have the following rights:

1. Transparency and information on how we process your personal data (**right to be informed**). Right that we satisfy, for example, through this legal text.
2. Right to request us to stop processing your information while a complaint is being resolved, among other cases (**right to limit processing**).

Additionally, when we process your personal data based on subscription:

1. Right to request that we delete personal data from our records (**right to erasure or "to be forgotten"**). You can carry out this request at any time by closing your account (subscription).
2. Right to **revoke** at any time **the consent** previously given to any of our processing of your personal data.

8. Data security

We have implemented strong security controls to safeguard User's personal information against loss, misuse, unauthorized access, disclosure or alteration.

For example, to protect your personal data, Secure Socket Layer (SSL) technology is used during the transmission of data. This means that an approved encryption procedure is used for communication between your computer or device and www.ingeniums.nl , as long as your browser supports SSL.

9. International data transfers

We carry out international data transfers in relationship with some of the processing described in the previous clause with certain data processors: subcontractors and content delivery networks to help us to deliver our Services.

A data processor, as already said, is an external subcontractor that we hire, and that may have access to personal data about users or collaborators, or that stores them in the context of the service provided to us.

Some of these external service providers are located outside of the European Economic Area (EEA), so the processing of your personal data involves an international data transfer.

Our international data transfers can occur to countries with a level of protection of personal data potentially lower than that imposed by the RGPD. Said international data transfers are covered by standard contractual clauses (art 46.2.c) GDPR).

10. Complaint submission

If you, the User, do not agree with the way STELLA consultancy processes your personal data, you can contact us by sending an email to info@ingeniums.nl