

PRIVACY POLICY

1.- What is the company responsible for processing your data?

The company responsible for processing your data is FLOCKTORY SPAIN, S.L. (hereinafter, "**FLOCKTORY**"), holder of Tax. I.D. number B-87445102, with corporate domicile in 4, Plaza Carlos Trías Bertrán, 28020 (Madrid).

The purpose of this Privacy Policy is to inform the user (hereinafter, the "**User**") of the web page <https://www.flocktory.com/en/> (hereinafter, the "**Website**") about the collection and use of his/her personal data.

The access and/or use of the Website, attributes you the condition of User (from now on, the "User"), and implies the acceptance, from such access and/or use, of the present Privacy Policy.

The User may contact FLOCKTORY in connection with the present Data Privacy and Protection Policy at dataprivacy@flocktory.com.

2.- Why is FLOCKTORY legitimized to process your data?

FLOCKTORY is entitled to process your data in order to provide its services. By means of this contractual execution, FLOCKTORY will be able to get, through its intermediaries, to put its Users in contact with companies dedicated to the sale of hearing systems.

Furthermore, FLOCKTORY is entitled to process your data based on the consent requested from the User or on a legitimate interest if applicable.

FLOCKTORY takes the protection of your privacy and personal data very seriously. Therefore, your personal information is kept secure and treated with the utmost care.

This Privacy Policy governs the access to and use of the service (the "**Service**") that FLOCKTORY makes available to the User interested in the services and Content hosted on the Website.

3.- What are the purposes of the processing of your personal data?

Under the provisions of the GDPR, we hereby inform you that your personal data will be processed for the following purposes:

3.1 To provide the services requested by the User on the Website.

3.2 To deliver commercial communications and/or newsletters to the User by FLOCKTORY and on behalf of third parties:

If the User has so consented, his/her personal data may be used to send him/her by letter, telephone, e-mail, SMS/MMS, or other equivalent electronic communication means, commercial communications or information from companies related to those in the sectors of:

- **Telecommunications:** Telecommunications and technology products and services.

- **Health:** Medical and health care. Medical and pharmaceutical products. Prosthetic and hearing products.
- **Financial:** Provided by financial institutions,
- **Insurance:** Insurance companies (cars, commercial vehicles, health, life, motorcycles, pets, home, etc.) and social welfare.
- **Energy and water:** Products related to electricity, hydrocarbons, gas and water.
- **Marketing or commercial prospecting.**
- **Leisure:** Sports, Collecting, Tourism, Photography, Hobbies, Toys, Transport, Gardening, Hobbies, Publishing, Communication and Entertainment, Lotteries.
- **Consumer goods:** Electronics, computers, image and sound, accessories, home, bazaar, furniture, real estate, food and drink, health and beauty, personal care (parapharmacy, pharmaceutical specialities, perfumery, cosmetics), fashion and accessories, jewellery, costume jewellery, precious stones, decoration, textiles.
- **Automotive:** Products and services related to all types of cars (cars, motorcycles, trucks, etc.).
- **NGOs:** Products and services related to NGOs and ideologies.

3.3 Transfer of personal data to third companies: If the User has so consented, his or her data may be transferred to companies related to the sectors listed and detailed in point

The purpose of the transfer will be the sending, by letter, telephone, e-mail, SMS/MMS, or other equivalent electronic communication means by these companies of information and commercial communications that may be of interest to you.

4.- Veracity of the data provided by the Users

The User guarantees the veracity of the personal data supplied and undertakes to communicate to FLOCKTORY any changes in said data. The User shall be responsible, in any event, for the veracity of the data supplied, and FLOCKTORY reserves the right to exclude from the services any Users who may supply false data, without prejudice to any other actions which may be initiated under the law.

It is recommended that Users protect their data with utmost diligence by using appropriate security tools. FLOCKTORY will not be liable for any theft or unlawful amendment or loss of data.

Any amendments or updates of the data must be communicated to FLOCKTORY through the means of communication provided in the present Privacy Policy.

5.- Data preservation

The protection of the privacy and personal data of the Users is very important to FLOCKTORY. Therefore, FLOCKTORY makes every effort to prevent the User's data from being misused. Only authorized personnel have access to the User's data.

FLOCKTORY will preserve the User's personal data only for as long as it is necessary to fulfill the purposes for which it was collected, as long as the User does not revoke his or her willingness to unsubscribe from FLOCKTORY's Services.

Subsequently, if necessary, FLOCKTORY will keep the information blocked for the legally established periods.

We hereby inform the User that his/her data will be collected only for the purposes stated in the above paragraphs and will not be processed in a way which is incompatible with said purposes.

6.- How can I revoke my consent and exercise my rights?

Users are entitled to:

- (i) Access their personal data;
- (ii) request the rectification of any inaccurate data;
- (iii) request the erasure of their data;
- (iv) request that the processing of their data be limited;
- (v) object to the processing of their data; and
- (vi) request the portability of their data. Furthermore, Users will have the right not to be the subject of decisions based solely on automated data processing.

In order to exercise said rights, Users must provide proof of their identity to FLOCKTORY by sending a photocopy of their Spanish I.D. card or any other documents approved by law for this purpose.

The User can exercise all these rights at the following email address dataprivacy@flocktory.com indicating the reason for his request and providing a copy of his ID.

The User may also send his request by ordinary mail to the following address:

FLOCKTORY SPAIN, S.L.

N.I.F. B-87445102

Carlos Trías Bertrán 4, 28020, Madrid

Without prejudice to any other administrative and/or judicial actions which may be at their disposal, Users shall be entitled to file a claim before the Supervisory Authority, in particular in the Member State where they have their usual residence or their workplace or in the place where any alleged infringement has taken place, if they consider that their personal data have not been processed in accordance with applicable regulations and/or if they have been prevented from exercising any of their rights. The Supervisory Authority receiving the claim shall inform the claimant of the situation and result of the same.

7.- Data security and preservation.

The protection of the privacy and personal data of its clients and visitors is very important to FLOCKTORY. Therefore, FLOCKTORY uses all its best efforts to prevent your data from being used inadequately. Only authorized personnel have access to your data.

FLOCKTORY keeps personal data protection security levels as provided by applicable regulations and has implemented all technical means at its disposal to prevent any loss, misuse, alteration, unauthorized access to and/or theft of the data provided by the Users through its Website, without prejudice to informing Users that security measures on the Internet are not impregnable.

FLOCKTORY undertakes to comply with its duty to maintain the secrecy and confidentiality of personal data as provided by applicable law, as well as to provide them with secure processing in international data transfers and assignments, where appropriate.

In those services of the Web Site that require registration as a User, a password must be chosen. The User is responsible for maintaining the confidentiality of this password, as well as for all activities that occur during the session initiated with his/her name and password.

The User agrees to notify FLOCKTORY as soon as possible of any unauthorized use of its User name and/or password or any other breach of security. FLOCKTORY will not be liable for any damage or loss that may arise due to the User's failure to comply with this obligation.

The personal data provided will be kept by FLOCKTORY for as long as may be necessary to render the service.

8.- Updates and changes in our Privacy Policy

FLOCKTORY reserves the right to make amendments in this Privacy Policy. Said changes will be communicated to the Users through notices posted on the Website or by any other means which may be appropriate.

However, any changes to this Privacy Policy will be communicated to the User

9.- Links

This Website may include links to other websites. Note that we are not responsible for any data processing which may be performed by the holders of other websites. This Privacy Policy will be applied exclusively to information which we compile on this Website. We recommend that you read the privacy policies of other websites which you may access through links located on our Website or which you may visit otherwise.

The conditions offered by these websites may not be the same as those offered by FLOCKTORY.

10.- General inquiries

If you have any enquiries about this Privacy Policy or the processing of your data please contact FLOCKTORY by email at the following address: dataprivacy@flocktory.com.