

## Privacy Policy

*Note: This document has been translated to English only for your reference and might contain errors. The Spanish version of this document is the only legally valid document.*

At WOODFLOW TECHNOLOGIES S.L., we are committed to ensuring that your personal data are protected and not used for purposes other than those specified in this Privacy Policy. For this reason, in this section, we inform users and interested parties about everything concerning the processing of their personal data, thereby complying with the data protection regulations applicable in our country: the General Data Protection Regulation (EU) 2016/679 of 27 April on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter, "GDPR") and Organic Law 3/2018, of 5 December, on Personal Data Protection and guarantee of digital rights (hereinafter, "LOPDGDD").

This Privacy Policy applies to data processing carried out by WOODFLOW TECHNOLOGIES S.L. through this website: <https://strongbyform.com/> (hereinafter, the "Website") and/or those indicated. We recommend that you read it carefully before using this Website or providing your data through it. You can consult us about any doubts in this regard via email at: [info@strongbyform.com](mailto:info@strongbyform.com).

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In this Policy, you will find all the information relating to the processing of your personal data and the rights you can exercise to maintain control over them. In this sense, you will find information about:

1. Who is responsible for processing your data.
2. What requirements you must meet to provide us with your personal data.
3. What data processing we carry out through the Website and what are its main characteristics, explaining:
  - What data we collect and the means of collection.
  - For what purposes we collect the data you provide.
  - What is the legal basis for their processing.
  - How long we keep them.
4. To whom your data is disclosed.
5. Existence of international transfers of your data.
6. What your rights are and how you can exercise them.
7. How we protect your personal information.
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### 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Your personal data will be processed by the company WOODFLOW TECHNOLOGIES S.L. ("STRONG BY FORM"), with Tax ID B56221534, whose contact details are:

- Address: Calle Javier Ferrero 10, 28002, Madrid, Spain
- Contact Email: [info@strongbyform.com](mailto:info@strongbyform.com)

## **2. WHAT REQUIREMENTS MUST YOU MEET TO PROVIDE US WITH YOUR PERSONAL DATA?**

2.1. Minimum Age. To provide us with your personal data, you must be at least 14 years old, and/or have sufficient legal capacity to use this Website.

2.2. Truthfulness. When you provide us with your data to use our services, you guarantee that the data and information provided are real, truthful, up-to-date, and also belong to you and not to third parties. Furthermore, you must notify us of any changes that occur in the data provided, responding in any case for the truthfulness and accuracy of the data supplied at all times. 2.3. Age and Truthfulness Control. At STRONG BY FORM, we reserve the right to verify your age and identifying information at any time, if necessary, even requiring an official document or equivalent procedure and, in case of fraud detection or suspicion that you are under the indicated age, to delete, temporarily disable and/or cancel your account.

## **3. WHAT DATA PROCESSING DO WE CARRY OUT THROUGH THE WEBSITE AND WHAT ARE ITS MAIN CHARACTERISTICS?**

Here, we explain how we process your personal information and provide you, in detail, all the relevant information relating to your privacy: 3.1. When you contact us through our channels (email):

- What are the ways we collect data? Sending emails to the address info@strongbyform.com or other electronic addresses of STRONG BY FORM.
- What data do we collect? Identifying and contact information. We collect your identifying data (name and surname) and email address, as well as any other data you voluntarily include in the communications you send us. We may request additional information if necessary to fulfill your request or requirement.
- What are the purposes of processing your personal data? To answer your requests. The main purpose of processing these data will be to respond to your requests, resolve your doubts and/or provide the required information, as well as, where applicable, to follow up on your requests.
- What is the legal basis for processing your data? Is the provision of this data mandatory? Consent. The data provided for the above purposes will be processed based on your consent, granted when you voluntarily contact us through the means made available to you to request information or make some request. The information that you must provide mandatorily will be indicated with an asterisk or in a similar way. Without such information, it would not be possible to attend to your inquiries or requests.
- How long do we keep your information? We will process all your personal information for as long as your requests are being processed, and, if necessary, to follow up on them. Once this period is over, STRONG BY FORM will keep, blocked, this information for the periods provided in the legislation to address possible liabilities and to demonstrate compliance with our obligations.
- To whom do we disclose your personal information? We do not make any additional transfers to carry out this processing other than those indicated, in general, in point 4. Who do we disclose your personal information to? In this sense, some channels through which you can contact us are managed by

service providers, who act as Data Processors. You will find more information on how these service providers act in point 4, mentioned earlier.

#### **4. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?**

In general, at STRONG BY FORM, we do not communicate your data to third parties. However, besides the transfers specifically indicated in the section where we explain the characteristics of the different operations (point 3), we inform you of the communications that we can make, in general, and that affect all previous processing and their legal basis.

- i. Essential service providers to carry out the service we offer you (for example, computer hosting companies). Nevertheless, these entities have signed the corresponding confidentiality agreements and will only process your data according to our instructions, not being able to use them for their own purposes or apart from the service they provide us.
- ii. Public Bodies. We may disclose to the competent public authorities the data and any other information that is in our possession or that is accessible through our systems when there is a legal obligation to do so, as well as when required, for example, when the purpose is to prevent or prosecute abuses of the services or fraudulent activities through our Website or web page. In these cases, the personal data that you provide us will be preserved and made available to the administrative or judicial authorities.
- iii. In the case of a corporate transaction: In the event of a merger, an acquisition, sale of all or part of its assets or any other type of corporate transaction involving a third party, we may share, disclose or transfer user data to the successor entity (even during the pre-operation phase).
- iv. To third parties after aggregation or anonymization: we may disclose or use aggregated or anonymized data (i.e., which cannot be linked to an identified or identifiable natural person) for any purpose.
- v. To third parties with the user's consent or other legal basis: In the case that we want to share data with third parties outside the scope of this Privacy Policy, your consent will be requested in any case, or the same and its legal basis will be informed.

#### **5. ARE YOUR PERSONAL DATA TRANSFERRED TO THIRD COUNTRIES OUTSIDE THE EUROPEAN ECONOMIC AREA?**

Some of our service providers are located in countries outside the European Economic Area ("EEA"). The location of these companies outside the EEA involves an international transfer of your personal data, which could mean a lower degree of protection than that provided in European regulations. However, at STRONG BY FORM, we have applied measures so that such transfers do not result in a lower degree of protection for your personal data. In this regard, service providers located outside the EEA have a valid mechanism to carry out international transfers: (i) they have signed the corresponding standard contractual clauses approved by the European Commission ("SCC"), an agreement signed between both entities by which the non-EU company guarantees that it applies European data protection standards, or (ii) when they are US companies, alternatively to the SCC, they may be certified by the new Decision of Adequacy to the EU-US Data Privacy Framework (DPF). Therefore, the use of these providers does not lead to a lower degree of protection of your personal data than that of using providers located in the EEA. You can consult the content of the SCC and the Decision of Adequacy to the EU-US Data Privacy Framework at the following links:

- [https://commission.europa.eu/publications/standard-contractual-clauses-controllers-and-processors-eueea\\_en](https://commission.europa.eu/publications/standard-contractual-clauses-controllers-and-processors-eueea_en)

- [https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf\\_en](https://commission.europa.eu/document/fa09cbad-dd7d-4684-ae60-be03fcb0fddf_en) Below, we indicate the international transfers we make from STRONG BY FORM: Name Country Transfer mechanism

## 6. WHAT RIGHTS CAN YOU EXERCISE AS AN INTERESTED PARTY?

You can exercise the rights that the law guarantees you in relation to the processing of your personal data by contacting us via email at [info@strongbyform.com](mailto:info@strongbyform.com). Any request for rights that we receive will be resolved as soon as possible and, in any case, within the maximum period established by the legislation from the time we receive it. In some cases, it may be necessary to request a copy of your identity document or another identifying document if it is necessary to verify your identity.

The rights that correspond to you as an interested party are the following: i. Right to withdraw consent granted You can revoke your consent in relation to all processing based on it at any time. However, the withdrawal of consent will not affect the lawfulness of processing based on consent prior to its withdrawal. ii. Right of access You have the right to know what data are being processed, if applicable and, if so, obtain a copy of these, as well as to obtain information relating to:

- the origin and recipients of the data;
- the purposes for which they are processed;
- if there is an automated decision-making process, including profiling;
- the retention period of the data; and
- the rights provided for by the regulations.

iii. Right of rectification You have the right to obtain the rectification of your personal data or to complete them when they are incomplete. iv. Right of erasure You have the right to request the erasure of your personal data if they are no longer necessary for the purpose for which they were collected or, if applicable, if we are no longer authorized to process them. v. Right to data portability You have the right to request data portability in the case of processing of your data based on your consent or the execution of a contract, provided that the processing is carried out by automated means. In case of exercising this right, you will receive your personal data in a structured, commonly used format readable by any electronic device. However, you can also request, where possible, that your data be transmitted directly to another company. vi. Right to restrict the processing of your personal data You have the right to restrict the processing of your data in the following cases: a) When you have requested the rectification of your personal data during the period in which we verify the accuracy of the data. b) When you consider that we are not authorized to process your data. In this case, you can ask us to limit their use instead of requesting their deletion. c) When you consider that it is no longer necessary for us to continue processing your data and want us to keep them for the purposes of exercising or defending claims. d) In cases where there is processing based on our legitimate interest and you have exercised your right to object to it, you can ask us to limit the use of your data during the verification of the prevalence of such interests with respect to yours. vii. Right of opposition You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling. Unsubscribe from commercial communications: Remember that at any time you can oppose the reception of this type of communications by sending us an email to [info@strongbyform.com](mailto:info@strongbyform.com). You can also unsubscribe from this service by following the instructions indicated at the bottom of each of the electronic communications we send you. viii. Right to file a complaint with the Control Authority Remember that, at any time, and in case you consider that we have violated your right to the protection

of your data, you can turn in their defense to the corresponding Control Authority, in the case of Spain, the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

## **7. HOW DO WE GUARANTEE THE CONFIDENTIALITY OF YOUR INFORMATION?**

The security of your personal data is a priority for us. Therefore, STRONG BY FORM has implemented all the necessary security measures to guarantee an effective use and processing of the personal data provided by the user, safeguarding the privacy, confidentiality, integrity of the same, and making use of the technical means necessary to avoid their alteration, loss, unauthorized access or processing, according to the state of technology at any given time. Consequently, we comply with the recommended security standards to protect them. However, it is impossible to guarantee their security completely due to the very nature of the internet and because there may be malicious actions by third parties outside our control. We commit to act quickly and diligently in case the security of the data is at risk or compromised, and to inform you about it if it is relevant.

## **8. MODIFICATIONS TO THIS POLICY**

At STRONG BY FORM, we may modify the content of the privacy policy at any time, especially when there are legislative, jurisprudential, or interpretation modifications of the competent authorities that affect the data processing carried out by STRONG BY FORM through this Website. Any new version of this Privacy Policy will take effect on the published date. Therefore, we recommend that you periodically review this Privacy Policy to be informed about how your personal data are treated and protected, as well as the rights that assist you.

This Privacy Policy was modified on June 17, 2024.