

PRIVACY POLICY

Last updated: December 2018

Lyntia Networks S.A.U. (lyntia) is owner of the website www.lyntia.com, and accordingly is the party responsible for the information displayed on its website. Since it is lyntia's intention to protect personal data, we will explain below what type of data we process, how we process them and the technical and organizational measures introduced to make correct use of these data.

For the purposes of this Privacy Policy, a user will be understood as any person who interacts or browses the lyntia website.

In order to comply with this Privacy Policy, we have taken into consideration the General Data Protection Regulation, the Spanish Organic Law on Data Protection and the Guarantee of Digital Rights (Ley Orgánica de Protección de Datos y Garantía de los Derechos Digitales), as well as any other regulation that may implement or supplement it in the future.

We recommend that you carefully review our Privacy Policy to ensure that you understand how your personal information will be used when browsing the website.

1. Who is the data controller of your data?

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

For the purposes of this Privacy Policy, the data controller is Lyntia Networks, S.A.U., with registered office at Paseo de la Castellana 259D (Torre Espacio) C.P. 28046 – Madrid; registered at the Commercial Registry of Madrid, under Volume 28235, Page, 69, Section 8, Sheet M-508573; and holder of Tax ID No. A-61648069.

2. How do we collect your information?

Directly from you: We collect the information you provide when filling out the different forms on the website or sending us an email (e.g. name, surname(s), email, country, and any other information you choose to give us).

From the use you make of the website: you can use our website from any device. We use tools that help us understand how you browse our website. For further information, please visit our [Cookies Policy](#)

3. What information do we collect from you and for what purposes will we use it?

In general, the personal data you provide to us and that we obtain from you are used to process your requests and transactions, to provide you with a high quality service and to inform you about opportunities that we believe will be of interest to you.

a) Contact information, information on the provision of our services: We collect the information you provide us with when you contact us or when you request information about the characteristics of the services we provide, through the forms on the pages or by sending an email (name, surname(s), email, country, and any other information that you wish to share with us: company, position, telephone no.). The purpose is to provide you with the requested information, including quotations for products and services. In this case, the lawful basis for processing your data is your consent.

b) Availability of the service: if we need to check the availability of the service in your location and we ask you for location information. In this case, the lawful basis for processing your data is the need to apply, at your request, pre-contractual measures.

c) Information to send advertising: we collect the information you provide us with to send commercial communications about lyntia's products and/or services (name, surname(s), and email). The purpose is to send you commercial communications about our products and services, to send you our publications, opinion polls, promotional and advertising information, offers (including customised offers), according to your interests and based on a profile prepared by us, by telephone, postal mail, email, SMS and MMS. In this case, the lawful basis for

processing your data is your consent.

d) Electronic data: IP address, type and identification of the device, type and language of the browser, domain through which you access the website, browsing data, activity on the website. These data will be processed to ensure the security of our website and of the information. In this case, the lawful basis for the processing of your data is the legitimate interest in providing a secure environment and avoiding damage to lyntia's systems and the information of its users, as well as unauthorised access and improper use thereof.

e) Information about how you browse our website: the information collected is used to measure website activity, to know how you interact with the website, in order to introduce improvements to the service or, where appropriate, measure the online advertising campaigns that lyntia may contract (e.g. information about the browser you are using and your IP address). Please see our Cookies Policy for further information. In this case, the lawful basis for processing your data is your consent.

When the basis for processing is consent, you may withdraw this consent at any time by sending notice to protecciondedatos@lyntia.com along with a copy of your national identification document or identification document, specifying your address for communication purposes and providing us with the details required to process your request. You can contact us through any of the channels set out in this Privacy Policy

Keep in mind that receiving commercial information is not essential to maintain our relationship with you. If you prefer not to receive commercial communications, you can inform us at any time through the channels indicated, or unsubscribe via the link provided for this purpose in commercial communications you receive by email or, if communications are sent by other means, through the procedure indicated for these purposes.

i. To what extent will decision-taking be automated?

lyntia does not use fully automated decision-making processes to enter into, develop or terminate a contractual relationship with you. If we use those processes in a specific case, we will keep you informed, we will inform you of your rights in this regard and we will comply with our obligations in accordance with applicable regulations.

ii. Will profiling take place?

In order to be able to offer you products and/or services according to your interests and to improve your user experience, we may perform "commercial profiling" based on the information provided. However, automated decisions will not be made based on that profile.

correo postal, correo electrónico, SMS y MMS. En este caso, la base legal para el tratamiento de tus datos es tu consentimiento.

4. For how long do we store the information provided?

lyntia will store your personal data for the time necessary to fulfil the purposes for which they were collected or until you exercise your right to remove or withdraw your consent.

They will then be erased, unless the law requires or permits a longer storage period (for example, for the formulation, exercise or defence of claims), in which case they will be duly blocked for the necessary time before being erased.

To determine an adequate storage period for your data, we apply the following criteria:

a) The data required to provide you with information you have requested, including product and service quotations, will be stored for the time necessary to deal with and process these requests, in accordance with the applicable legal provisions and the limitation periods for actions set out in the regulations.

b) The data required to check the availability of the service in your location will be stored for the time necessary for these purposes, in accordance with the applicable legal provisions and the limitation periods for actions provided for in the regulations.

c) The data related to the acquisition of lyntia's products and services within the framework of a contractual relationship will be stored during the validity of the contract with lyntia or for the time necessary to exercise the rights and to comply with the obligations arising from the contract with lyntia, in accordance with the applicable legal provisions and the limitation periods for actions provided for in the regulations.

- d) When there is consent to receive commercial communications, your data will be stored until you withdraw your consent or inform us of your wish not to continue to receive these communications, in accordance with the applicable legal provisions and the limitation periods for actions provided for in the regulations.
- e) When cookies are installed on your device, the data will be stored in accordance with the applicable legal requirements and the recommendations issued by the competent authorities.

5. With whom can we share information?

We only use, transfer or share personal data with third parties in the terms described in this Privacy Policy. lyntia does not sell or rent your personal data to third parties and will only disclose them to persons or entities if we obtain your prior consent or in compliance or in accordance with applicable legislation when such consent is not necessary for a specific transfer.

We will share or give third-party access to your personal data when doing so is necessary to achieve one of the objectives described below and in accordance with prevailing legislation:

- a) Our suppliers: lyntia will disclose or allow access to your personal data to companies that provide us with services under a contract, when this is necessary for the fulfilment of the purposes described in this Privacy Policy: IT and website services, distribution of emails, call-centre, web positioning services, marketing, market analysis and organisation of promotional campaigns. If any of these service providers require access to your personal data, they use them solely to provide a service and in accordance with our instructions. We also require them to maintain the confidentiality and security of the data and to return or destroy the data when they no longer require them.
- b) Legal obligations: lyntia may disclose your personal data when the transfer is necessary to comply with a legal obligation, including transfer to the competent authorities, judges and courts. This includes compliance with the requests made by the authorities pursuant to Spanish Law 10/2010, of 28 April, on prevention of money laundering and terrorist financing (Ley sobre prevención de blanqueo de capitales y financiación del terrorismo).
- c) Companies of the lyntia Group: lyntia will allow access to your personal data to lyntia Group companies within the European Union that provide us with services and act as data processors, for the purposes described in this Privacy Policy.

6. Accuracy of data and responsible use

You agree and commit with lyntia to ensure that the information provided is accurate, true, updated and that it belongs to you and not to third parties.

If you include information from third parties, you must request authorisation and inform them of this Privacy Policy before sending such information.

We at lyntia reserve the right to verify the accuracy of the data provided, and to request documentation substantiating this and, if necessary, to erase them.

7. Security measures

At lyntia the security measures introduced are the measures required by law for each type of processing. However, the Internet is not 100% secure, so we cannot guarantee that the use of these pages is completely secure. Accordingly, you must adopt the precautions of any Internet browsing (password protection, use of antivirus, etc.).

If you have knowledge or suspicion of the misuse of personal data or unauthorised access to them, we ask you to let us know as soon as possible through any of the channels indicated in section 11 of this Privacy Policy.

We are committed to act quickly if there is any problem that could jeopardise the security of the information furnished and, where appropriate, to inform you if it is relevant.

8. These pages are not designed for under-age children

Our services are aimed at companies and their representatives. If you are the mother/father/legal guardian of an under-age child and you believe that you have provided us with their information, please contact us at the

following email address: protecciondedatos@lyntia.com, and specify in the subject line: *"Deregistration of an under-age child"*.

9. Our website may connect with links or websites of third parties

Our website may have links or plug-ins associated to third party websites (Facebook, Twitter & LinkedIn, among others). This Privacy Policy does not cover the websites of these third parties. You must read the Terms of Use of those websites.

10. Contact us: How can you exercise your rights as a user?

In accordance with applicable regulations, you have a series of rights in relation to the collection and processing of your personal data.

These rights are as follows:

- a) Right to be informed: the right to be informed in a concise, transparent, intelligible and easily accessible way, using clear and simple language, about the use and processing of your personal data.
- b) Right to access: the right to request at any time that we confirm whether we are processing your personal data, which we provide you access to these data and to the information about their processing, and to obtain a copy of the data. The copy of your personal data that we provide you with is free, although any request for additional copies may be subject to payment of a reasonable amount based on administrative costs. We may ask you to prove your identity or require further information in order to manage your request.
- c) Right to rectification: the right to request the correction of inaccurate, outdated or incomplete personal data that concerns you. You may also request that incomplete personal information be completed, including through an additional statement.
- d) Right to erasure: the right to request the erasure of your personal data when, among other reasons, they are no longer necessary for the purposes for which they were collected or processed. However, this right is not absolute, and accordingly lyntia may continue to store the data, keeping them duly blocked, in the cases provided for under applicable regulations.
- e) Right to restrict processing: the right to request that we restrict the processing of your personal data, which means that we can continue to store them, but not continue processing them if any of the following criteria are met:
 - that you challenge the accuracy of the data, for a period that allows us to verify its accuracy;
 - the processing is unlawful and you oppose the erasure of data and instead request restriction on their use;
 - lyntia no longer needs the data for the purposes of processing, but you require them for the formulation, exercise or defence of claims;
 - you have not opposed the processing, while verification takes place as to whether lyntia's legitimate reasons prevail over yours.
- f) Right to data portability: the right to have your data transferred to another data controller in a structured, commonly used and machine-readable format. This right applies when the processing of your personal data is based on the consent or performance of a contract and this processing is carried out by automated means.
- g) Right to object: This right allows you to object to the processing of your personal data, including profiling. We will stop processing your data unless we prove legitimate reasons for processing or for the formulation, exercise or defence of claims.
- h) Right to revoke consent: In cases where we have obtained your consent for the processing of your personal data in relation to certain activities (for example, in order to send you commercial information), you may withdraw this consent at any time.
- i) Right to submit a complaint to the supervisory authority: the right to submit a complaint to the Spanish Data Protection Agency (AEPD), whose details can be consulted at <http://www.agpd.es>.
You may exercise your rights by sending notice to protecciondatos@lyntia.com along with a copy of your national identification document or documents that prove your identity, specifying your address for communication purposes and providing us with the details required to process your request.

If you wish to revoke the consent given that the sending of commercial communications, you may inform us

at any time through the channels indicated or unsubscribe via the link provided for this purpose in commercial communications by email you receive or, if communications are sent by other means, through the procedure indicated for these purposes.

If your requests are clearly unfounded or excessive, especially due to their repetitive nature, we may apply a reasonable fee, taking into account the corresponding administrative costs, or choose to ignore the request.

If you require further information about your rights, you may contact us through any of the channels specified in section 11.

11. Identification Details of our Data Protection Officer

If you have any questions or wish to receive further information about the processing or protection of your personal data, you may contact us through any of the following ways:

Data controller: Lyntia Networks, S.A.U.

Postal Address: Paseo de la Castellana 259D (Torre Espacio), Madrid (28046)

Telephone: 91.550.77.00

Email: protecciondedatos@lyntia.com

12. Actualización de esta Política de Privacidad

Our website www.lyntia.com may modify this Privacy Policy based on new legislative or regulatory requirements or to adapt this policy to the instructions issued by the competent authorities.

Whenever significant changes occur, the user will be informed according to the requirements stipulated by law and by means of an informative notice on the website.