

PRIVACY POLICY AND PERSONAL DATA PROTECTION

WEBSITE WWW.B2BIT.ES

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, repealing Directive 95/46/EC ("GDPR"), ORGANIC LAW 5/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights ("LOPDGDD"), and the applicable data protection regulations in force

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1. CONTENT AND COMPLIANCE

This document constitutes the Privacy and Personal Data Protection Policy (hereinafter, the "Privacy Policy") applicable to the personal data provided through the website www.B2BIT.es (hereinafter, the "Website"), mainly enabled to provide information about the services offered by the company B2B INFORMATION TECHNOLOGY, S.L. ("B2BIT").

"User" means the person who accesses, uses, browses, or contracts the services, whether free of charge or paid, offered through the Website. The User freely and voluntarily decides to provide their personal data through the Website, as well as to use the services and communication channels available therein, in which case the provision of certain personal data may be required in order to respond to and process their request.

The complete legal information of the Website (hereinafter, the "Complete Legal Information") consists, jointly and as a single unit, of the text contained in this Legal Information document (including the Conditions of access, use, and browsing), together with this Privacy Policy and the Cookie Policy. These documents are accessible directly via a link located at the bottom of the Website (hereinafter, collectively referred to as the "Complete Legal Information"). Consequently, the interpretation and application of the legal terms applicable to the Website must be carried out jointly, considering all of the aforementioned documents.

Access to, use of, and browsing of the Website by the User are voluntary actions that imply the User's express consent and full acceptance of the entire content of the "Complete Legal Information" (including the Legal Information document, Privacy Policy, and Cookie Policy), as well as the processing of their personal data in accordance therewith. Therefore, if the User does not agree with any of the terms set out in these documents, they are requested not to provide any personal

data and to refrain from using the Website and any of the services made available therein.

The User undertakes to strictly observe and comply with the provisions contained in the aforementioned documents that form part of the Complete Legal Information, as well as with any applicable legal provision.

The User may print and digitally store all of the aforementioned documents, which are permanently available through a direct access link located at the bottom of the Website.

Users are advised to read the Complete Legal Information (Legal Information, Privacy Policy, and Cookie Policy) in full on a regular basis and, in any case, each time they access the Website or decide to provide personal data, as its content may be subject to modifications. Any modifications will be duly published and will always remain accessible on the Website, making reference to their version and date.

B2BIT adopts, in the processing of data, the principles set forth in Article 5 of the GDPR:

- **Lawfulness, fairness, and transparency:** Personal data shall be processed lawfully, fairly, and transparently in relation to the data subject.
- **Purpose limitation:** Data shall be collected for specified, explicit, and legitimate purposes and shall not be further processed in a manner incompatible with those purposes.
- **Data minimization:** Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- **Accuracy:** Data shall be accurate and, where necessary, kept up to date. All reasonable steps will be taken to ensure that inaccurate personal data are erased or rectified without delay in relation to the purposes for which they are processed.
- **Storage limitation:** Data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- **Integrity and confidentiality:** Data shall be processed in a manner that ensures appropriate security through the implementation of suitable control measures.

When personal data are requested through the completion of a form or similar method, and it is necessary to click on a "Submit" button or similar, a box with "Basic information on data protection" will be made available, as well as a check box for acceptance, indicating that the User has read and consented to this Privacy Policy (and, where applicable, with a direct link to it at that time). Clicking on this acceptance box necessarily constitutes confirmation that the User has read and been informed of the content of this Privacy Policy and grants consent to it, as well as to the processing of their personal data in accordance with its terms.

By accepting this Privacy Policy, you expressly consent that the personal data provided through the Website, including health-related data, should you voluntarily provide such data, may be processed by B2BIT for the purposes mentioned herein and in accordance with the content of this Privacy Policy.

2. IDENTIFICATION OF THE DOMAIN OWNER, SERVICE PROVIDER, DATA CONTROLLER AND CONTACT DETAILS

In compliance with the applicable regulations on information society services, it is hereby informed that the owner of the domain www.B2BIT.es (the "Website") and the company providing its services and offering its products through it, as well as the Data Controller, is:

B2B INFORMATION TECHNOLOGY, S.L., Tax ID No. B56621550, with registered office and mailing address at **AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain)**.

Company registration details: registered in the Commercial Registry of Las Palmas de G.C., General Companies Volume 2,338, Page 18, Sheet GC-62046, 1st entry.

For direct contact with B2BIT:

- **Postal address / Office address:** AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain)
- **Telephone:** (+34) 628 15 56 12
- **Email:** info@b2bit.es

For the exercise of rights regarding personal data protection:

- **Postal address / Office address:** AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain)
- **Email:** lpd@b2bit.es

3. BASIC AND ADDITIONAL INFORMATION ON DATA PROTECTION REGARDING THE SENDING AND RECEIVING OF EMAILS BY B2BIT

In compliance 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 ("General Data Protection Regulation" or "GDPR"), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights ("LOPDGDD"), and the applicable data protection regulations, and by consenting to the processing of your data, we inform you and you consent to the content of this notice and to the processing of your data in accordance therewith.

Data Controller:

B2B INFORMATION TECHNOLOGY, S.L., Tax ID No. B-76296052, with registered office and mailing address at AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008 LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain).

Contact phone: (+34) 628 15 56 12 | Contact email: lpd@b2bit.es.

Source of data: The data originate from emails sent and/or received by B2BIT through its corporate email accounts. Any personal data or information contained in such emails is incorporated into our data processing systems.

Purposes: To manage, respond to, provide assistance with, and maintain the relationship generated through the company's emails and their content.

Providing your data via email is voluntary. Depending on the subject matter, you may be requested to provide only the mandatory and necessary data to comply with legal obligations and with the circumstances of your relationship with the company. Failure to provide such data may prevent the relationship from being carried out.

Legal basis for processing your data:

- Execution of a contract and/or services requested by you.
- Your consent when sending us your emails.
- Compliance with legal obligations. (Art. 6.1 a), b), and c) GDPR and Art. 19 LOPDGDD).

Recipients of your data: The data controller, and third parties to whom communication is legally required or necessary for the relationship, including third parties who need to know the content for processing purposes, Public Administrations with

jurisdiction, Law Enforcement Agencies, Judicial Police, Courts and Tribunals, as applicable, and third parties contracted by the controller to provide services (data processors) where necessary (e.g., legal advice, administrative services, IT services, email providers, repositories, and archiving).

The controller has no intention of transferring your data to a third country or international organization. Notwithstanding the above, B2BIT uses Microsoft 365 services for email communications. Microsoft is based in the United States and was formerly subject to the EU-U.S. Privacy Shield (now invalidated). You expressly consent to this possible transfer of data to the United States, a country currently not deemed to provide an adequate level of data protection under EU law. Microsoft has adopted the European Union Standard Contractual Clauses (SCCs) to provide safeguards for such international transfers.

Data retention period: Your data will be retained for the duration of your relationship with the data controller and as long as necessary to comply with legal obligations or for the formulation, exercise, or defense of claims relating to your relationship or the processing of your data, and until the expiration of statutory limitation periods.

Your data protection rights: See Section 7 of this Privacy Policy.

B2BIT does not carry out automated decision-making or profiling with your data.

4. BASIC AND ADDITIONAL INFORMATION ON DATA PROTECTION REGARDING THE SENDING OF COMMERCIAL COMMUNICATIONS BY EMAIL

In compliance with Article 21 of Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce (LSSI-CE), Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 ("General Data Protection Regulation" or "GDPR"), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights ("LOPDGDD"), and the applicable data protection regulations, regarding the use of your personal data for sending commercial communications by email—and having obtained your consent to receive such commercial communications or where you are a customer of our services—we inform you that your data will form part of our data processing system, under the following terms:

Data Controller:

B2B INFORMATION TECHNOLOGY, S.L., Tax ID No. B-76296052, with registered office and mailing address at AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain).

Contact phone: (+34) 628 15 56 12 | Contact email: lpd@b2bit.es.

Accordingly, please note that B2BIT processes your personal or professional contact details data provided directly by you, either as a private individual or as a professional/representative of the private company/public entity to which you belong—including your email address, for the purpose of informing you about our products and services, as well as solutions tailored to you or your company, by sending commercial communications via email. The lawful basis for this processing is **your consent**, and you may unsubscribe from receiving these emails at any time by sending an email to lpd@b2bit.es.

Alternatively, where you have previously been a **customer** of our products and services, we process your contact details provided directly by you, either as a private individual or as a professional/representative of the private company/public entity to which you belong including your email address, for the purpose of sending commercial communications via email. In this case, the lawful basis is **Article 21(2) of the LSSI-CE**. You may unsubscribe from receiving these emails at any time by sending an email to lpd@b2bit.es.

In all cases, the contact details processed by B2BIT have been provided by the data subject themselves. We remind you that you should **not** provide third-party data unless you are authorised to do so and have previously informed such third parties of the content of this information.

In the context of sending commercial communications by email, we process your email address and, where applicable, your name and/or job title, for the following purposes:

- **Where you have been a customer of our products or services:** Management of customers and users; execution, performance, and maintenance of your legal relationship with the company and the circumstances arising therefrom, including the sending of commercial communications by email; fulfilment of contracts and agreements; billing, collection, accounting, administration, and tax obligations.

- **Where you have not been a customer of our products or services, or even if you are, but you have expressly consented to the sending of commercial communications by B2BIT:** To manage the sending of commercial communications by email regarding news, commercial information on products and services, seasonal greeting campaigns, promotions, and surveys related to the company's business activity.

The provision of your data for the purpose of sending commercial communications by email is voluntary. If you do not wish to receive such communications, please do not provide your consent. If you have already consented, you may revoke your consent at any time by unsubscribing, objecting to the processing of your data, or sending an email to lpd@b2bit.es.

Source of data: Your data originate from your relationship as a customer, or from having provided your email address with express consent to receive commercial communications by email.

Data processed: Your email address and, where applicable, your name and/or job title.

Legal basis for processing your data:

- Your consent.
- Article 21(2) of the LSSI-CE.
- Execution of contracts and/or services requested by you.
- Compliance with legal obligations.
(Article 6(1)(a), (b), and (c) GDPR; Article 19 LOPDGDD; and Article 21(2) LSSI-CE).

Recipients of your data: The data controller and third parties to whom communication is legally required or necessary due to the relationship, including Public Administrations with jurisdiction, Law Enforcement Agencies, Judicial Police, Courts and Tribunals, as applicable, and third parties contracted by the controller for the provision of services (data processors), where necessary to provide such services (e.g., email marketing service providers, legal advisors, administrative services, IT services, email providers, repositories and archiving, website management services, etc.).

The data controller does not intend to transfer your data to a third country or international organization. Notwithstanding the above, B2BIT uses Microsoft 365 services for email communications. Microsoft is based in the United States and was formerly subject to the EU-U.S. Privacy Shield (now invalidated). You expressly consent to this possible transfer of data to the United States, a country currently not deemed to provide an adequate level of data protection under EU law. Microsoft has adopted the European Union Standard Contractual Clauses (SCCs) to provide safeguards for such international transfers.

Data retention period: Your data will be retained for the duration of your relationship with the data controller and until your consent is withdrawn, as well as for the time necessary to comply with legal obligations or for the formulation, exercise, or defense of claims relating to your relationship or the processing of your data, and until the expiration of statutory limitation periods.

Your data protection rights: See Section 7 of this Privacy Policy.

B2BIT does not carry out automated decision-making or profiling with your data.

5. BASIC AND ADDITIONAL INFORMATION ON DATA PROTECTION REGARDING DATA OBTAINED THROUGH THE USE AND MANAGEMENT OF THE WEBSITE

In compliance 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 ("General Data Protection Regulation" or "GDPR"), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights ("LOPDGDD"), and the applicable data protection regulations, and by consenting to the processing of your data in the event that you provide them through the use and management of the Website, we inform you that your data will form part of our data processing system, under the following terms:

Data Controller:

B2B INFORMATION TECHNOLOGY, S.L., Tax ID No. B-76296052, with registered office and mailing address at AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain).

Contact phone: (+34) 628 15 56 12 | Contact email: lpd@b2bit.es.

Source of data: Data provided through any of the following means: contact form, data transmitted, provided, or obtained through any of the contact methods available on the Website. Other data processed may be those freely provided throughout the communication between both parties, which may include health-related data, to which you expressly consent.

Data processed: Data requested through the mentioned collection methods and those voluntarily provided, such as email address, name.

Purpose: To manage, respond to, provide assistance with, and maintain the relationship generated through the company's websites, including the management and assistance of users and potential clients, as well as to shape their contents.

Where fields intended to collect personal data in the enabled forms are marked with an asterisk (*), completion is mandatory, while the rest are voluntary. Failure to provide the required mandatory data may result in our inability to accept and/or process your request or the web service you intend to use.

Legal basis for processing your data: Your consent, the fulfilment of requested services, and compliance with applicable legal obligations (Article 6(1)(a), (b), and (c) GDPR; Art. 19 LOPDGDD).

Recipients of your data: The data controller and third parties to whom communication is legally required or necessary for the relationship, including Public Administrations with jurisdiction, Law Enforcement Agencies, Judicial Police, Courts and Tribunals, as applicable, and third parties contracted by the controller to provide services (data processors), where necessary to provide such services (e.g., website management, legal advice, administrative services, IT services, email providers, repositories, and archiving).

The controller has no intention of transferring your data to a third country or international organization. Notwithstanding the above, B2BIT uses Microsoft 365 services for email communications. Microsoft is based in the United States and was formerly subject to the EU-U.S. Privacy Shield (now invalidated). You expressly consent to this possible transfer of data to the United States, a country currently not deemed to provide an adequate level of data protection under EU law. Microsoft has adopted the European Union Standard Contractual Clauses (SCCs) to provide safeguards for such international transfers.

Data retention period: Your data will be retained for the duration of your relationship with the data controller and as long as necessary to comply with legal obligations or for the formulation, exercise, or defense of claims relating to your relationship or the processing of your data, and until the expiration of statutory limitation periods.

Your data protection rights: See Section 7 of this Privacy Policy.

B2BIT does not carry out automated decision-making or profiling with your data.

6. BASIC AND ADDITIONAL INFORMATION ON DATA PROTECTION IN RECRUITMENT PROCESSES AND RECEIPT OF CURRICULUM VITAE

In compliance with the GDPR, the LOPDGDD, and the applicable data protection regulations, we hereby inform you—and you consent—to this information and to the processing of your data in accordance with it.

Data Controller:

B2B INFORMATION TECHNOLOGY, S.L., Tax ID No. B-76296052, with registered office and mailing address at AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain).

Contact phone: (+34) 628 15 56 12 | Contact email: lpd@b2bit.es.

Source of data: The data voluntarily provided by you in your freely formatted curriculum vitae. The provision of your data is voluntary.

Purpose: Recruitment and staff selection processes.

Legal basis for processing your data: Your consent and compliance with applicable legal obligations (Article 6(1)(a) and (c) GDPR).

Recipients of your data: The data controller and third parties to whom communication is legally required or necessary for the relationship, including Public Administrations with jurisdiction, Law Enforcement Agencies, Judicial Police, Courts and Tribunals, as applicable, and third parties contracted by the controller for the provision of services (data processors), where necessary to provide such services (e.g., website management, legal advice, administrative services, IT services, recruitment, human resources, email providers, repositories, and archiving).

The controller has no intention of transferring your data to a third country or international organization. Notwithstanding the above, B2BIT uses Microsoft 365 services for email communications. Microsoft is based in the United States and was formerly subject to the EU-U.S. Privacy Shield (now invalidated). You expressly consent to this possible transfer of data to the United States, a country currently not deemed to provide an adequate level of data protection under EU law. Microsoft has adopted the European Union Standard Contractual Clauses (SCCs) to provide safeguards for such international transfers.

Data retention period: Your data will be retained for a maximum period of twelve (12) months. If during this period your curriculum has not been updated or used, it will be deleted, unless it must be retained for a longer period to comply with a legal obligation requiring the processing and retention of your data, or where necessary for the formulation, exercise, or defense of claims related to your relationship or the processing of your data, in which case it will be retained until the expiration of the relevant limitation periods. If, as a result of a recruitment process, you are hired, your curriculum will become part of your employment record, and your data will then be processed in accordance with the terms applicable at the time of signing your employment contract.

Your data protection rights: See Section 7 of this Privacy Policy.

B2BIT does not carry out automated decision-making or profiling with your data.

7. RIGHTS REGARDING THE PROTECTION OF PERSONAL DATA

You are hereby informed of the existence of your **RIGHTS** regarding data protection, which you may exercise by contacting the Data Controller. These rights are as follows:

- **RIGHT OF ACCESS**

The data subject (owner of the data) has the right to obtain from B2BIT (the Data Controller) confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information

about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;

i) where personal data are transferred to a third country or to an international organization, the data subject has the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

- **RIGHT TO RECTIFICATION**

The data subject (owner of the data) has the right to obtain from B2BIT (the Data Controller), without undue delay, the rectification of inaccurate personal data concerning them. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- **RIGHT TO ERASURE (“Right to be Forgotten”)**

The data subject (owner of the data) has the right to obtain from B2BIT (the Data Controller), without undue delay, the erasure of personal data concerning them, and B2BIT is obliged to erase such personal data without undue delay where one of the following circumstances applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased for compliance with a legal obligation under Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

- **RIGHT TO RESTRICTION OF PROCESSING**

The data subject (owner of the data) has the right to obtain from B2BIT (the Data Controller) the restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- b) the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims;
- d) the data subject has objected to processing, pending verification of whether the legitimate grounds of the controller override those of the data subject.

- **RIGHT TO DATA PORTABILITY**

The data subject (owner of the data) has the right to receive the personal data concerning them, which they have provided to B2BIT (the Data Controller), in a structured, commonly used, and machine-readable format, and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent, and
- b) the processing is carried out by automated means.

The data subject also has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

- **RIGHT TO OBJECT AND NOT TO BE SUBJECT TO AUTOMATED INDIVIDUAL DECISION-MAKING (including profiling)**

The data subject (owner of the data) has the right to object, at any time and on grounds relating to their particular situation, to the processing of personal data concerning them in certain cases. They also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

- **RIGHT TO ERASURE (“Right to be Forgotten”)**

The data subject has the right to obtain from B2BIT (the Data Controller), without undue delay, the erasure of personal data concerning them. B2BIT is obliged to erase such data without undue delay where one of the

following grounds applies:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws consent on which the processing is based, and there is no other legal ground for the processing;
- c) the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- e) the personal data must be erased for compliance with a legal obligation under Union or Member State law to which the controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

- **RIGHT TO RESTRICTION OF PROCESSING**

The data subject has the right to obtain from B2BIT (the Data Controller) restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the data;
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise, or defense of legal claims;
- d) the data subject has objected to processing, pending verification of whether the legitimate grounds of the controller override those of the data subject.

- **RIGHT TO DATA PORTABILITY**

The data subject has the right to receive the personal data concerning them, which they have provided to B2BIT (the Data Controller), in a structured, commonly used, and machine-readable format, and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:

- a) the processing is based on consent, and
- b) the processing is carried out by automated means.

The data subject also has the right to have the personal data transmitted directly from one controller to another, where technically feasible.

- **RIGHT TO OBJECT AND NOT TO BE SUBJECT TO AUTOMATED INDIVIDUAL DECISION-MAKING (including profiling)**

The data subject has the right to object, at any time and on grounds relating to their particular situation, to the processing of personal data concerning them in certain cases. They also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

- **RIGHT TO WITHDRAW CONSENT**

You are informed of your right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

- **RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY**

You are also informed of your right to lodge a complaint with the Spanish Data Protection Agency (AEPD) through any of the following means:

- Electronic headquarters: www.aepd.es
- Postal address: Agencia Española de Protección de Datos, C/ Jorge Juan, 6, 28001 – Madrid
- Telephone: +34 901 100 099 / +34 91 266 35 17

- **HOW CAN I EXERCISE MY RIGHTS REGARDING THE PROTECTION OF PERSONAL DATA?**

You may exercise your rights regarding the protection of personal data before B2BIT through either of the following two channels:

1. By submitting a written request to, or delivering it at, B2BIT's registered office address indicated in Section 2 of this Privacy Policy.
2. By sending an email to the address provided in Section 2 of this Privacy Policy.

In order to exercise your rights, you must provide us with:

- A signed written request.
- Proof of your identity (National ID card, passport, or equivalent identification document).
- Documentation evidencing representation by a third party, where applicable (e.g., for minors under 14 years of age, incapacitated persons), such as a power of attorney or authorization of representation.

Depending on the right you exercise, we may request additional information needed to locate the data you are requesting or to be able to satisfy your right.

If you wish, we can provide you with forms for the exercise of your rights, which you may request through the same channels set out in Section 2.

8. BASIC AND ADDITIONAL INFORMATION ON DATA PROTECTION REGARDING THE EXERCISE OF DATA PROTECTION RIGHTS

In compliance with the GDPR, the LOPDGDD, and the applicable data protection regulations, we hereby inform you—and you consent—to this information and to the processing of your data in accordance with it.

Data Controller:

B2B INFORMATION TECHNOLOGY, S.L., Tax ID No. B-76296052, with registered office and mailing address at AVENIDA ANDRÉS PERDOMO (ED ZONA FRANCA), S/N, C.P. 35008, LAS PALMAS DE GRAN CANARIA, Province of Las Palmas (Gran Canaria, Spain).
Contact phone: (+34) 628 15 56 12 | Contact email: lpd@b2bit.es.

Source of data:

All information or data provided in the exercise of your data protection rights will be incorporated into our processing systems. Such data originate from the information included in your rights request, from the forms made available for that purpose, from data transmitted, provided, or obtained by any means as a result of your request, or from the content of emails exchanged with the Data Controller. Other data processed may be those freely provided throughout the communication between both parties.

Data processed:

The data obtained in the exercise of your rights include: name and surname, national identity card (D.N.I.), passport or equivalent identification document, address, signature, contact details, and proof of legal representation, where applicable (mandatory data). You may also voluntarily include health-related data, to which you expressly consent.

Purpose:

To manage the exercise of personal data protection rights and any circumstances that arise from or are necessary for such exercise.

Where fields intended to collect personal data in the forms are marked with an asterisk (*), completion is mandatory, while the rest are voluntary. Failure to provide the mandatory data may result in the request not being accepted and/or processed, or the service requested not being provided.

Legal basis for processing your data:

Your consent and compliance with applicable legal obligations (Article 6(1)(a), (b), and (c) GDPR).

Recipients of your data:

The data controller and third parties to whom communication is legally required or necessary due to the relationship, including: Public Administrations with jurisdiction, banks, savings banks, and rural savings banks, insurance companies, third parties engaged by the company for services in whose context complaints and/or claims are lodged, Law Enforcement Agencies, Judicial Police, Courts and Tribunals, and third parties contracted by the controller for the provision of services (data processors) where necessary to provide such services (e.g., website management, legal advice, data protection services, administrative services, IT services, management of your request, email providers, repositories, and archiving).

The controller has no intention of transferring your data to a third country or international organization. Notwithstanding the above, B2BIT uses Microsoft 365 services for email communications. Microsoft is based in the United States and was formerly subject to the EU-U.S. Privacy Shield (now invalidated). You expressly consent to this possible transfer of data to the United States, a country currently not deemed to provide an adequate level of data protection under EU law. Microsoft has adopted the European Union Standard Contractual Clauses (SCCs) to provide safeguards for such international transfers.

Data retention period:

Your data will be retained for the duration of your relationship with the data controller and for as long as necessary to comply with legal obligations or for the formulation, exercise, or defense of claims relating to your relationship or the processing of your data, and until the expiration of statutory limitation periods.

Your data protection rights:

See Section 7 of this Privacy Policy.

B2BIT does not carry out automated decision-making or profiling with your data.

9. QUALITY AND ACCURACY OF DATA

B2BIT will only request such personal data as are adequate, relevant, and not excessive in relation to the purpose for which they will be used.

The User guarantees the truthfulness, accuracy, validity, and authenticity of the personal data provided, being liable for any damages or losses that may be caused to the owner of the Website or to third parties as a result of a breach of this guarantee. The User also undertakes to inform B2BIT of any modification or rectification of their data, so that the data remain up to date at all times and do not contain errors. The procedure for communicating such circumstances shall be that established for the exercise of personal data protection rights in Section 2 of this Privacy Policy.

The person providing the data guarantees and is responsible for being the rightful owner of the data provided, and shall be liable for any claim, damage, or loss arising from non-compliance with this circumstance. The impersonation of any identity, the adoption of false identities, the provision of personal data or information of third parties as if they were the User's own, as well as the provision of false personal data by the User, are strictly prohibited. Likewise, the registration of false or fraudulent data is expressly prohibited, and such registrations may be cancelled, without prejudice to the adoption of appropriate legal measures.

10. THIRD-PARTY DATA

Personal data must not be provided by anyone who is not the rightful owner thereof.

If the User provides personal data of third parties, they must have previously informed such third parties, in an express, precise, and unequivocal manner, of the content of this Privacy Policy and must have obtained their consent and authorization to provide such data.

In the event that the User fails to comply with the provisions of this section, B2BIT shall be exempt from any liability or claim made by third parties regarding the processing of personal data provided by the User in breach of the aforementioned legal requirements or obligations. In such cases, the User shall be solely liable to B2BIT or to any third party for any damages or losses caused in connection with these circumstances.

All of the above is without prejudice to any communication that B2BIT may make to the aforementioned third parties, where applicable, in accordance with the contact details provided by the User, in order to comply with a legal obligation.

11. MINORS' DATA

Access to and browsing of the contents of the Website is free and permitted to any Internet user. However, the use and/or contracting of certain services and/or products offered through the Website is subject to age restrictions.

In any case, this Website does not seek to obtain personal information or data from minors, either directly or indirectly.

For inquiries, the exercise of data protection rights, or the establishment of informative contact involving the provision of personal data, if the User is a minor aged 14 years or older, and has the necessary legal capacity, they may provide their personal data directly on the Website through the available contact channels for consultation purposes, unless the assistance of their legal representatives is legally required. However, if the User is a minor under 14 years of age, regardless of whether they may have free access to visit the Website's content, they may not provide their personal data directly through any of the communication channels or forms available on the Website. In such cases, the consent of their legal representatives is always required.

The contracting of services and the establishment of contact for such purposes with B2BIT may only be carried out by Users who are of legal age (18 years or older) and possess sufficient legal capacity.

B2BIT disclaims any liability for non-compliance with these requirements and reserves the right to prevent or decline communications or the contracting of its products and/or services due to lack of legal capacity (in terms of data protection and under civil law). To verify age and legal capacity and, where applicable, the authenticity of the consent of legal representatives, B2BIT may implement various procedures, including requesting a copy of an identity document and contacting the legal representatives to confirm representation and authorization, and even requesting documentation proving parental authority and/or legal representation, without which the request cannot be processed.

In the event that personal data of minors/persons without legal capacity are provided through the use of the Website, the individual providing such data and acting on their behalf hereby declares, under their own responsibility, that they hold the legal representation/parental authority of the minor/person without legal capacity, or that they have the express authorization of those who hold such authority. Accordingly, they declare that they have sufficient legal capacity to provide such data and to give consent on their behalf and representation. B2BIT may request documentation evidencing such authority.

Legal representatives shall, in any case, be considered responsible for the acts performed by the persons under their care, in accordance with the applicable legislation.

12. SECURITY MEASURES

B2BIT adopts and implements the necessary technical and organizational measures to ensure the security of personal data, in accordance with data protection regulations, preventing their alteration, loss, unauthorized processing, or access, and ensuring the confidentiality, integrity, availability, and permanent resilience of processing systems and services.

Notwithstanding the above, the User should be aware that Internet security measures are not entirely infallible. B2BIT will process the personal data provided by the User with due confidentiality and under the duty of secrecy.

B2BIT shall not be responsible for the processing and subsequent use of personal data carried out by third-party providers of information society services acting outside the Website.

13. SOCIAL NETWORKS

In the event that B2BIT has a presence on social networks, B2BIT does not process the personal data of individuals who participate in them.

However, it is possible that the social networks themselves impose limitations on the processing of personal data within B2BIT's professional profiles. In such cases, the processing of personal data carried out in this context shall be subject to those restrictions.

In any case, we recommend reading the access and usage conditions of such profiles, as well as the legal terms, conditions, and privacy policies applicable to each social network, which can be consulted on their respective websites.

For further information, please refer to the Social Networks section in the Legal Information.

14. LANGUAGE

You may select the language in which you wish to browse the Website by choosing between Spanish and English at the top right-hand corner of the Website.

This Privacy Policy has been drafted in Spanish and translated into other languages. In case of any conflict between versions, the Spanish version shall prevail for interpretation purposes.

15. DURATION AND AMENDMENT OF THE PRIVACY POLICY

The applicable Privacy Policy shall be the one published on the Website at any given time.

B2BIT reserves the right to amend, in whole or in part and at any time without prior notice, the content of this Privacy Policy to expand, improve, specify, or update its content, whether due to legislative or jurisprudential changes or business strategy decisions. Such modifications shall not have retroactive effect. In case of amendment, the previous version shall cease to apply, and the modified version shall apply from the date of its publication.

The Privacy Policy will always be accessible on the Website via a direct link, including information about its version number and date of publication, from which it shall be effective.

16. NULLITY AND ENFORCEABILITY

If any clause or text included in this document is declared null or void, the document itself shall nevertheless remain fully valid and binding for the parties under the same terms, provided it can subsist without the nullified clauses or texts.

Si alguna de las cláusulas o textos incluidos en este documento fuera declarada nula, el propio documento seguirá siendo plenamente eficaz y obligatorio para las partes en los mismos términos, siempre que pueda subsistir sin las cláusulas o textos declarados nulos.

17. APPLICABLE LAW AND JURISDICTION

Spanish law shall apply. Unless specific regulations establish otherwise, the User and B2BIT expressly submit to the Courts and Tribunals of Las Palmas de Gran Canaria for any dispute. This is without prejudice to our willingness to resolve any dispute amicably beforehand.

18. COOKIE POLICY

The Website uses cookies. For further information, please consult our Cookie Policy, where you will also find details on how to disable and/or delete them.

The Cookie Policy is permanently available and accessible via a direct link under that designation.