

PRIVACY POLICY

SCOPE OF APPLICATION

ECHO DIGITAL HUB, S.L. it is committed to protecting the privacy of its customers and users who access our website <https://codiciamo.com/> (hereinafter, the website).

The contents of the website are owned or operated, licensed or controlled by ECHO,

From now on we will refer to the commercial name of ECHO DIGITAL HUB, S.L., as ECHO.

The use of this website confers the condition of user (hereinafter, the "user").

The user has no obligation to register in order to use the website.

The user can browse and use the website without providing any personal data. The only personal information to which ECHO will have access will be the one that the user provides voluntarily through the forms available for this purpose, or through contacting ECHO by e-mail or any other way provided on the website. If personal data is collected through cookies, users will be duly informed of this in the Cookies Policy, as well as through the channels required by current legislation.

The user can browse and use the Website without providing any personal data. The only personal data to which ECHO will have access will be those that the user provides voluntarily through the registration form, or when contacting ECHO via email or in any other way provided on the website.

This document presents our policy in the observance and use of personal data collected through our website or auxiliary devices such as cell phones or tablets. Likewise, the use of the website implies the acceptance by the user of the provisions contained in this Privacy Policy and that their personal data will be treated as established in its content.

Please note that although there may be links on our website to other websites, this Privacy Policy applies only to this website and not to other companies or organisations' websites to which it is redirected. ECHO does not control or approve the content of third party websites or accept any responsibility for the content or privacy policies of such websites.

PERSONAL DATA PROTECTION

In view of the above, and in compliance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, in pursuance of the Organic Law 3/2018 of 5 December on the protection of personal data and the guarantee of digital rights, as well as in accordance with the provisions of current regulations, we hereby provide the information indicated below:

The Responsible for the processing of users' personal data is:

ECHO DIGITAL HUB, S.L.

C.I.F.: B02672483

Address: Carrer de Provença, 339, 08037,

Barcelona Telephone: +39 0282398384

Email DPO: dpo@echodigitalhub.com

Registration: Commercial Register of BARCELONA

Data collection through devices such as mobile phones or tablets. When users use the website created by ECHO, if applicable, we may receive information about users' location and users' mobile device or tablet, including a unique identifier for such devices. We may use this information to provide users with location-based services such as search results and other personalised content. Most mobile devices allow users to disable these location-based services.

Data processed, record of processing activities and purpose of processing. With regard to the processing of the personal data provided to us or any other personal data that may arise as a result of the access or use of the service by the user, we inform users that such data will be incorporated into the existing data processing system, which is owned by and is the responsibility of ECHO, and that the user expressly consents to the processing of such personal data in a legal, fair, transparent, adequate, relevant, limited, accurate and updated way for the following purposes:

| PURPOSE | LEGAL BASIS FOR DATA PROCESSING |
|--|--|
| Data processing for statistical purposes, to improve the quality of the services provided. | Legitimate interest, since by means of these statistics we can improve the web, offering a superior quality. |
| Sending users offers through electronic communications. | Express consent to the extent that the user consents by accepting the corresponding checkbox. |

To address and solve user requests and requests that may be made through their orders or communications.

Legitimate interest and, in the event that the request is related to the exercise of rights, our legitimacy will be the fulfilment of a legal obligation.

Thus, in the event that users give their express *consent*, they will receive information about offers and orders by electronic means. However, the user may at any time revoke the consent given for the sending of advertising via email, by contacting the DPO at dpo@echodigitalhub.com to the postal mail of the address indicated above from the Data Controller or by following the instructions contained in the telematic communications.

Children under the age of 18 may only consult and provide data on the Website under the supervision and authorisation of a parent or guardian. Likewise, given the difficulty of ECHO to know the true age of users, it is noted that it should be the parents or legal guardians' duty to prevent minors from accessing the website and provide personal data without their supervision, exempting ECHO from all responsibility.

Contact form/email contact/phone contact

Our website contains a contact form that can be used to contact us electronically. Whenever users make use of this possibility, the personal information users provide on the form (e.g. users' name, email address, etc.) when users click on the "send" button will be transmitted to us and saved. In addition, we also save the date and time users used the contact form to prevent misuse of our contact form and ensure the security of our information processing systems.

Alternatively, users can also contact us directly via email dpo@echodigitalhub.com or by calling us.

We will store the personal data transmitted in connection with the establishment of contact with us and exclusively for the purposes to which we have referred to above. We will not transmit this personal data in any way to third parties, without prejudice to what is stated below. We will delete the data collected in this context at the time its storage is no longer necessary, or limit its processing, in case there is a legal obligation for its preservation.

We do not make automated decisions based on profiles, except for advertising personalisation and online fraud prevention.

Data Categories.

Identification data through FORMS:

- **Contact:**

Through the contact form the user provides the following personal data:

Name and e-mail, in addition to all the information contained in the comments.

The period of storage of personal data. The data will be kept during the time of provision of the services and the optimal time for the fulfilment of legal obligations. In any case, these periods and time limits will be taken into account:

1. In terms of **suppliers and customers**:

- **Period:** They will be kept for the time necessary to comply with the purpose for which they were collected and to determine the possible responsibilities that may arise from that purpose and from the treatment of the data, in accordance with the provisions of the following matters.
 - **5 years for customer and supplier data**, with respect to the fulfilment of payment obligations that must be made for shorter years or periods. Article 1966 Civil Code.

2. Regarding the **processing of personal data for advertising and promotional purposes**:

- **Period:** The personal data of the persons interested in receiving advertising and promotional information from ECHO will be kept in the system indefinitely as long as the interested party does not request its deletion.

The information collected by our cookies will be kept for the period indicated [in the Cookies Policy](#).

In the event that the **user** unsubscribes, the data will be deleted at that time, without prejudice to the blocking of data in order to comply with the legal obligations in this regard.

Transfer of personal data. The information relating to our customers is very important to us, so we will only transfer data for the purposes contemplated. Without prejudice to the above and in the event that personal data has to be transferred to groups or persons not mentioned in this paragraph, we would inform them in due time to allow them to oppose to such transfer:

- Those in charge of the treatment necessary for the provision of the service with which we have signed a contract for the provision of services that obliges them to maintain confidentiality duties and security measures.
- Authorities or other third parties in cases where required by law or in the context of legal proceedings.
- **NAMECHEAP, INC** such as hosting.

User rights. The user may exercise their rights of rectification, limitation of treatment, deletion, opposition and right not to be subject to automated individual decisions, by sending a written and signed request, including their first name, surname and photocopy of their ID or any other valid supporting document to ECHO, to the address indicated above or by contacting the DPO at the e-mail dpo@echodigitalhub.com

The exercise of these rights is free, unless unfounded or excessive requests are made, in which case the user will assume the cost of processing the request.

The user may address the competent supervisory authority to make any claim they deem appropriate.

SECURITY MEASURES

ECHO informs users that it has adopted the necessary technical and organisational measures to maintain the required level of security in attention to the personal data processed and has also implemented the necessary mechanisms to prevent, as far as possible, unauthorised access, theft, unlawful modifications and loss of data.

We have physical, electronic, and procedural security systems in place in relation to the collection, storage and disclosure of users' personal information. Our security procedures may require us to ask users for proof of identity from time to time before we can provide users with confidential information.

CONFIDENTIALITY

In compliance with current regulations, ECHO is committed to fulfilling its obligation of secrecy of personal data provided by the user while browsing this Website, and its obligation to keep such data confidential.

INTERNATIONAL TRANSFERS

ECHO never discloses users' personal data without their specific permission, unless it is necessary to carry out a users' request or manage our interactive customer programs for clients. However, the information may be disclosed if required to do so by law, a court order or a regulation or request issued by the authorities.

ECHO makes use of the servers owned by Data Dyne Consulting, located at United States. As international data transfers are made, we have signed the corresponding contract of standard clauses. Users can consult this policy through the following link:

USE OF THIRD-PARTY COOKIES

Without prejudice to the Cookie Policy (add link to Cookie Policy), this Website uses Google Analytics, a web analytics service provided by Google, Inc. a Delaware company whose main office is at 1600 Amphitheatre Parkway, Mountain View (California), CA 94043, United States ("Google"). Google Analytics uses "cookies", which are text files placed on the users' computer, to help the website analyse how users use the website. The information generated by the cookie about users' use of our Website (including users' IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating the users' use of the Website and will compile reports on the Website activity and provide other services related to the Website activity and Internet usage. Google may also transfer this information to third parties if required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate the users' IP address with any other data held by Google. Users may refuse the processing of data or information by rejecting the use of cookies, which users can do by selecting the appropriate settings on their browser. However, by doing this users might not be able to use the full functionality of this Website. By using this Website users consent to Google processing data about users, in the manner and for the purposes stipulated above.

AUTOMATIC INFORMATION

The following are examples of the information we collect and analyse: The Internet IP address users use to connect to the Internet with their computer, email address, username and password for their account, information about users' computer, internet connection, browser type and version, time zone settings, browser connection type and version, the operating system and platform users use, their "visit history" (URL) from, through and to our Website (including date and time), number of cookies, and any phone numbers users have used to call our customer service. We may also use browser data such as cookies, flash cookies (also called local shared objects), or similar data at certain locations on our Website to prevent fraud, among other purposes. During users' visits to the Website, we may use software tools to measure and collect session information, including page response times, download errors, duration of visits to certain pages, information about how users interact with the page (mouse clicks, page scrolling and the number of times users mouse over certain items), and how users leave the website. We may also collect technical information to help us identify users' device for diagnostic analysis and fraud prevention purposes.

INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

All the Website's content is protected by intellectual property rights. This content includes, but is not limited to, the graphic design, source code(except logos, texts, graphs, illustrations,

photographs, Code of language, software and other elements that appear on the Website). Therefore, the user acknowledges that the reproduction, distribution, commercialisation, transformation and, in general, any other form of exploitation, by any means, of all or part of the contents of this Website constitutes an infringement of the intellectual and/or industrial property rights of ECHO or of the owner thereof.

Trademarks or distinctive signs of any kind contained on the Website are also protected by law.

Under no circumstances may the user modify or use such intellectual or industrial property in such a way that its disclosure would be detrimental to ECHO, in which case ECHO shall claim for any damages arising from the improper use by third parties of its intellectual and/or industrial property.

ECHO does not grant any license or authorisation of use of any kind on their right of industrial, intellectual or any other property or right related to the Website, services or content.

NOTICES AND REVISIONS

If users have any questions regarding ECHO's Privacy Policy please send us an email to dpo@echodigitalhub.com and we will try to answer them.

ECHO may modify and update this Privacy Policy at any time without notice. Please always check that users are aware of our Privacy Policy, Cookies Policy and Terms and Conditions of Use to stay informed at all times of the content that is collected through the Website, how we use it and the circumstances under which it may be disclosed to third parties. The user shall be automatically bound by the Terms and Conditions of Use in force at the time of accessing the Website, so users should read this document periodically.