

PERSONAL DATA PROTECTION POLICY

www.dir.cat

This personal data protection policy establishes the basis on which DiR treats your personal data when you provide it to us during your experience through our website www.dir.cat (hereinafter, "the Website").

The protection of personal data is extremely important to us, which is why we believe that an adequate treatment of personal data based on transparency with our clients generates trust and confidence.

Remember that every time you browse, buy our services or products, or make use of the services and functionalities of our Web and you are asked for personal data or it is necessary for us to access to such data, this Privacy Policy will be applicable to you. Therefore, you should read it and confirm that you agree with it. Please review it periodically for potential changes.

Who is responsible for the processing of your data?

Identity: Gestora Clubs DiR, S.L. (also referred to as "DiR", "we", "us" or "our").

TAX ID: B-62849146

Address: C/ Industria, 90-92 entlo. 6ª - 08025 Barcelona

Telephone: 931171700

If you have any questions, requests or concerns about the processing of your personal data please contact our Data Protection Officer at dadespersonals@dir.cat.

What personal data do we process?

When we indicate that we will process your personal data we refer to any information or data that allows us to identify you, either directly (e.g. your name and surname) or indirectly (e.g. your telephone number).

The personal data we collect through the Web can be collected directly through forms, applications, devices or pages on social networks, and data such as: name and surname, email, telephone, address, ID, date of birth, gender, bank details (online registration), if you are a member or not, objective sought when hiring certain services (slimming, muscle ...), time availability or user name; and also data that we collect indirectly as: personal preferences and purchasing habits, information about how you use the Web obtained through cookies, unique numeric identifiers such as the IP address of your computer or user-generated content.

For what purposes do we process your personal data?

The data collected or received through the Web are processed for the following purposes:

- **Customer service:** to respond to queries, requests for information, complaints and suggestions that may be made through the Web, and that may be related to any of our services, products, prices, promotions, new openings, investment opportunities and franchises, among others.
- **Concluding and managing the contractual relationship:** this includes managing the on-line registration as a customer, downloading an invitation, or registering for activities, courses or events; contacting you to finalize the on-line registration when you have initiated the process in order to assist you with any information you may need; sending you the corresponding documentation; processing and following up on the registration until you come to the center to finalize the formalities (e.g. for the delivery of your membership card or wristband); dealing with your queries and handling any disputes in relation to the above transactions; administering the payment of the on-line registration; managing the customer loyalty program, including the Club's loyalty program, including the Club's loyalty program. e.g., for the delivery of the access card or bracelet); attend to your queries and manage any dispute in relation to the referred transactions; manage the payment of the on-line registration; manage the customer loyalty program, including the Prestige Club; allow your participation in contests, publish comments and contents in our blog and social networks, as well as show you the schedules of activities of the selected center or the center closest to your location (app). It also includes allowing you to register on the website, whether you are a client of DiR Clubs or not, and allowing you to carry out the procedures in the private area of the website ("Gestions Online"): register for activities, events and courses; reserve courts or places in our sessions, buy tickets for the Diagonal pool, among others.
- **Access control:** your personal or biometric data may be processed, if you expressly consent in the latter case, in order to allow you access to the facilities, as well as, where appropriate, to keep track of the sessions provided.
- **Commercial, promotional and marketing activities:** we may contact you for commercial follow-up and to promote our services, products and investment opportunities, as well as those of our franchised centers and third parties with whom we have signed a collaboration agreement. Contact for these purposes may be made through any existing communication channel: mainly by email, phone calls, messaging services (including SMS and push notifications in app), social networks and postal mail. These commercial actions include contacting you by telephone during the online registration process as well as showing you advertisements and content online and on social networks.
- **Commercial profiling:** we may collect and analyze your personal data to evaluate certain personal aspects, in particular to analyze or predict aspects related to your personal preferences, interests, financial situation, behavior, location or relationships with other users and based on this analysis we will send or show you advertising communications or tailored content. This treatment is also known as profiling, and consists in short in categorizing a person according to his or her own characteristics

based on the automated processing of his or her personal data. It is commonly used in marketing actions and is practical for identifying the consumer profile or defining the target (target customer) of an advertising campaign.

We remind you that you have the right to object to the use of your data for profiling purposes, as described below in the section on your rights. Under no circumstances will we use this profile to make decisions that are based solely on automated processing of your data and that entail legal effects on you or that significantly affect you in a similar way (e.g. refusing to hire you in networks where there is no human intervention).

- **Analysis and improvement of services and products:** in order to better understand the needs and expectations of users and in order to improve our customer service, our services and products, we may send you satisfaction and quality surveys as well as statistics (these will allow us to know, for example, the reaction of users to our advertising campaigns). Also, in order to enable the proper functioning of the Web / applications and improve the user experience (e.g. to allow a proper display of its content; remember the login or language preference), technical and functional cookies are used. These cookies collect data related to the use that is made of the Web / applications, on the website from which you come, registration details, pages, videos or ads you have visited, products viewed, duration of visit, location and technical information (IP address, browser information, identifier of the device with which you navigate ...).
- **Analysis of job candidates:** in the event that you send us your CV through the section provided for this purpose, we inform you that the personal data provided will be processed for the purpose of analyzing your application and profile in order to evaluate your participation in current or future selection processes for hiring by any of the DiR Group companies or franchised centers.
- **Video surveillance:** Our Centers have video surveillance. The images are recorded for the purpose of security and surveillance of the Centers and their customers and will be deleted after 30 calendar days from its capture. The legal basis for this recording of images is art. 6.1 b) and f) of the RGPD.
- **Compliance with legal obligations:** there may be regulations that require the retention of personal data in order to comply with certain legal obligations or to meet liabilities. Thus, for example, the General Data Protection Regulation enables us to keep the personal data of those who have exercised their right of deletion during the period in which liabilities may arise and this in order to be able to formulate, exercise or defend claims. Your data may also be kept in order to prevent us from sending you commercial communications if you have requested not to receive them.

How long do we keep your data?

The personal data provided will be kept for the time necessary for the purpose for which we process your data, to fulfill your requests or needs, as well as to fulfill our legal and regulatory obligations and the defense of our interests (e.g. for our defense in court) or for statistical or historical purposes.

The criteria for determining the retention period of your personal data is as follows:

- Personal data obtained when contracting our services on-line: for the duration of our contractual relationship;
- Personal data collected when contacting us for a consultation: for the time necessary to answer your query;
- Personal data obtained when you create an on-line account (on-line transactions): for the duration of our contractual relationship if you are a customer or in the case of non-subscribers, until you ask us to delete it or after a period of inactivity (no active interaction with us) we may automatically delete it;
- Personal data obtained when you give your consent to receive commercial communications: until you unsubscribe, request us to delete it or after a period of inactivity (without active interaction with us);
- Biometric personal data obtained when you submit your consent for access control: until you unsubscribe or request that we delete it.
- Personal data of candidates: for the duration of the selection process and for a maximum period of two years. After this period, if you wish to continue participating in selection processes, you must resubmit your CV.
- Cookies that are installed on your computer: we store them for the time necessary to achieve their purposes (for example, during a session for shopping cart cookies or session identification cookies).
- Personal data obtained through video surveillance systems: we store them for a period of 30 calendar days.

What is the legitimacy for the processing of your data?

The legal basis for processing your personal data may be:

- Your consent (e.g. access control sending commercial communications or quality surveys);
- Our legitimate interest, which may be:
 - Conducting statistics: to help us better understand your needs and expectations and therefore improve our services, websites/applications/devices, products and brands.
 - Enabling the operation of our website/applications through technical and functional cookies: to keep our tools (websites/applications/devices) safe and secure and ensure that they work properly and continuously improve.
 - Profiling.
 - Providing you with our customer service.
 - Communication to group companies and affiliated entities.
- Execution of a contract: to perform the services you request from us;
- Fulfillment of legal obligations involving the processing of personal data (e.g. invoicing).

To which recipients will your data be communicated? Is there an international transfer of your data?

- To companies in the DiR business group, for administrative, client management, commercial management and candidate selection purposes, given that there is a global corporate tool for managing the user database, accessible by those companies that manage DiR Clubs. You can consult them here.

- To the companies that manage the franchised centers, when requesting information, contracting services or applying for a job at these centers. You can consult them here.
- If you have contacted us as a person interested in opening a franchised center, your data will be communicated to the franchising companies: Bcnfran16, S.L. (B-66718305), Streetioga 16, SL (B66776824) and Jambox Studio, SL (B-66740150) to attend your request.
- To the competent authorities for the fulfillment of legal obligations (e.g., courts and tribunals, public administrations with competence in the matter).
- To third party service providers to DiR, this communication is necessary only to the extent that they allow DiR to fulfill the purposes of the processing, and may not use them for any other purpose (e.g., system service providers - ICT). Sus datos no serán comunicados a terceros con los que Grupo DiR haya suscrito algún tipo de acuerdo de colaboración para remitirle información comercial, sino que, en todo caso, la información del tercero será incorporada en las comunicaciones que ya le viene enviado DiR (p.e. mediante la inclusión de un banner en la newsletter de DiR).

Your personal data may be processed or stored in countries outside the European Economic Area (EEA), depending on where our service providers are located. Data is only transferred outside the EEA if it offers comparable safeguards. Service providers located outside the EEA such as Facebook, Inc or Google, LLC may have access to your personal data. These service providers are covered by the "Privacy Shield" and are therefore obliged to protect your personal data in accordance with a number of well-defined protection standards and safeguards set by the European Union.

What are your rights regarding the processing of your data?

The regulation on protection of data recognizes you some rights with the purpose that you have the control on your data, and that you can exercise at any time going by e-mail to dadespersonals@dir.cat or in writing to Gestora Clubs DIR, SL, c/industria, 90-92, entlo. 6ª to the attention of Asesoría Jurídica. To process your request, we may ask you to prove your identity.

You are entitled with the following rights:

Your rights	What does it mean?
-------------	--------------------

Right to Information	You have the right to obtain clear, transparent and easy-to-understand information about how we use your personal data and about your rights. We provide you with such information in this Policy.
Right of access	Right of access You have the right to know whether or not your personal data is being processed and, if so, to know the purposes for which it is being processed, the category of data, the recipients, the storage period, and the rights concerning you, among others. A fee may be charged for administrative costs.
Right of rectification	You have the right to have your personal data rectified when it is inaccurate or no longer valid or to have it completed when it is incomplete.

Right to suppression (right to be forgotten)	In certain cases, you may have the right to have your personal information erased or deleted. It should be noted that this is not an absolute right, as we may have legal or legitimate reasons to keep it.
Right to limitation of the processing	You have the right to request the restriction of the processing of your data (we may store it but may no longer use or process it) in certain circumstances provided for by the General Data Protection Regulation: <ul style="list-style-type: none"> - that the data subject contests the accuracy of the personal data, during the period of time that allows the controller to verify the accuracy of the personal data; - the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead the restriction of their use; - the controller no longer needs the personal data for the purposes of the processing, but the data subject needs them for the formulation, exercise or defense of claims; - the data subject has objected to the processing pursuant to Article 21(1) while it is being verified whether the legitimate grounds of the controller override those of the data subject.
Right to data portability	You have the right to move, copy or transfer data from our database to another database. It is only possible to exercise this right with respect to data you have provided, where the processing is based on the performance of a contract or on your consent and the processing is carried out by automated means.
Right to object to the processing	You have the right to object to the processing of your data when it is based on the satisfaction of legitimate interests, including profiling and direct marketing..
Right to withdraw consent	You have the right to revoke any consent you have previously given for processing based on this consent. The withdrawal of consent will not affect the lawfulness of the processing based on the consent prior to its withdrawal.
Right to file a complaint with a controlling authority.	You have the right to complain to the Spanish Data Protection Agency if you consider that your rights in relation to the protection of personal data have been violated (www.agpd.es).

How is your data handled on DiR's social media profiles?

DiR has a presence on social networks and may process personal data of people who become followers of DiR on social networks or perform any connection action through them.

You should bear in mind that any information you publish on the social network profiles managed by DiR will become public information and will be available to visitors and the general public. This means that any user located in any country in the world will be able to access your information. In this regard, you should exercise special care and diligence when disclosing personal information on these Sites. Also, please note that the privacy policy of the relevant social network will apply.

Your personal data provided in the social networks managed by DiR will be processed by DiR for the following purposes: (i) to allow access and navigation to the content and services offered through said social networks (ii) to allow and manage participation in contests, promotions, sweepstakes or any other initiatives carried out by DiR and to manage the promotion of winners, as well as the delivery of possible prizes (iii) to allow the sending of information or commercial communications regarding our services and activities or with DiR Group companies (iv) to contact you in the event of any statement, complaint or claim regarding our services and to manage complaints received from third parties for abuse (v) to moderate the use, if applicable, of the social networks used by DiR, as well as to manage the use, if applicable, by DiR, of your personal data in its social networks. (iv) to contact you in the event of any manifestation, complaint or claim regarding our services and to manage complaints received from third parties for abuse (v) to moderate the uses, if any, of DiR's social networks.

Data processing of UNDERAGE

The data collection forms contained in this website are not intended for children under 14 years of age. The holders of parental authority or guardianship of the minor must authorize the processing of the child's data.

IF YOU ARE UNDER 14 YEARS OF AGE, YOU MAY NOT PROVIDE YOUR PERSONAL INFORMATION ON THIS WEBSITE. ASK YOUR PARENT TO HELP YOU READ THIS INFORMATION AND TO CLARIFY ANYTHING YOU DO NOT UNDERSTAND.

DiR will make reasonable efforts to verify that consent has been given by the holder of parental or guardianship rights over the child, taking into account available technology. For this purpose, we may request a contact address of those to whom we may address you.

DiR may contact you at any time to verify that you really are the age you have informed in the corresponding registration form. DiR may ask you for a copy of your ID card, granting you a period of time in which to provide it. Failure to meet the deadline or to provide any evidence requested by DiR will allow us to block your account until you can prove that you are over 16 years of age.

Updates to this policy

We may change this privacy policy from time to time. The "Effective Date" legend at the bottom of this policy indicates when it was last revised. Changes will be effective once the Privacy Policy is posted.

Effective Date: December 14, 2023