

INFORMATION REGARDING THE PROCESSING OF YOUR PERSONAL DATA

BASIC INFORMATION	
CONTROLLER	GESTORA CLUBS DIR, SL - CIF B62849146 - C / Industria, 90-92, entlo. 6 (08025) Barcelona.
PURPOSES	User account management Improve the operation of the App and the provision of services Prevention of abuse and fraud Other purposes: consult the section "Additional Information".
RIGHTS	Access, rectification, erasure, as well as other rights, as explained in the "Additional Information".

ADDITIONAL INFORMATION

At the time of downloading and executing the DIR application (hereinafter, the "App"), or when making use of the services of the App, User information is collected from it which is considered Personal data. Therefore, when you download and run the App, the User consents to the processing of their personal data for the purposes indicated below. In compliance with the provisions of the European Regulation 2016/679 General of Data Protection (hereinafter, "GDPR") and Organic Law 3/2018, of December 5 on Data Protection and Guarantee of Digital Rights (hereinafter, "LOPDGDD"), below we inform you about our data protection policy.

1. Data Controller

The Data Controller, responsible for the processing of your personal data, is:

GESTORA CLUBS DIR, SL (hereinafter, DIR), with address at Calle de la Industria, 90-92, entlo. 6 (08025) from Barcelona.

Contact information: Telephone: 902.10.1979

Email: info@dir.cat

Contact with the Data Protection Officer: dadespersonals@dir.cat

2. Gathering of Personal Data

Users' personal data obtained through the App, shall be gathered from:

- **Information you provide**: the one that you provide directly through the completion of forms, surveys or tests, such as the registration forms in the App, contact forms, request of our newsletter, or through the chat.
- **Information sent by your web browser**: we obtain information that your web browser sends us automatically. This information generally includes your IP address, the identity of your Internet service provider, the name and version of your operating system, the name and version of your browser, the date and time of your visit and the pages you visit. An "IP address" is a unique number that is automatically assigned to your device when you connect to Internet. It is used to identify the location of the computer in cyberspace so that the information requested can be sent.

In addition, when you access to an electronic communication that we send to you, such as when you open an email from us, your browser informs us that you (or someone using your email address) have done so. We use this information to improve our marketing efforts.

- Cookies and similar technologies: a cookie is a small file sent by the App and is stored on the device of the user on which the App is installed, allowing the Website to remember information about the user and their browsing preferences. They collect information, among others, on what pages they visit, how long they remain on each page, to avoid having to re-enter information that you have previously provided, personalize the user experience in the App or measure the success of our advertising in the App
- App: If you are going to access through our mobile application, prior to its installation, you must know and, through its installation, you accept that it accesses to information found on your mobile device. In particular, it may have access to the following information:
 - Application and device history
 - Identity
 - Calendar
 - Device location
 - Telephone, call log
 - Photos / Multimedia / Files

3. Purposes of the processing of personal data and legal basis:

The personal data of the Users will be treated with the following purposes:

(i) Make a proper management of your User account. This service includes:

- a. Generating a user account. If you are a client of DIR and you have the Online Management service activated at our website www.dir.cat. In this case, your access user will be your email informed to DIR and your access password will be unique for both services (Online Management Service and the App). If you do not have access credentials in Online Management, head to our Customer Service: info@dir.cat. If you have a user, but you cannot access, check the email address you have informed to DIR.
- b. Manage the services offered through the App, including sending reminders and notices, updates of App versions, support messages, chat.
- c. Sending commercial communications, to inform you about our services and products, including push notifications on your Device. You can manage your preferences about commercial communications in the App menu.

The legal basis is the execution of a contract with DIR.

- (ii) Improve the operation and features of the App by synchronizing the App with the calendar and Photos / Multimedia / Files of the device. The legal basis is your consent, otherwise you will not be able to use some features of the App.
- (iii) Improve the services you use by analyzing your behavior while using the App. You can modify the cookies installed on the device; see our Cookies Policy. The legal basis is your consent.
- (iv) Prepare a commercial profile based on the information we obtain from you during the use of the App and during the use as a DIR client of our services. This allows us to show personalized advertising based on the User's profile. No automated decisions that produce legal effects for the User, will be made based on that profile. The legal basis is our legitimate interest.

- (v) Allow a chat between the User and the DIR professional with whom the service has been contracted. Communication between the User and the DIR professional, when is not done in person, must be done through this via, not allowing other chats such as WhatsApp. Chat conversations are stored and can be reviewed by DIR, so you should not generate an expectation of privacy of conversations made through this channel. The legal basis is the execution of the contract with DIR.
- (vi) Prevention of abuse and fraud by the use of our services (fraudulent activities or contrary to the terms and conditions of the service, denial of service attacks, spam delivery, among others). The legal basis is our legitimate interest to protect DIR Users from abuse and fraud.
- (vii) Transfer of data to public bodies and authorities, as long as they are required in accordance with the legal and regulatory provisions. The legal basis is the fulfillment of legal obligations of DIR.

Without prejudice to the aforementioned purposes, they may also be used for other additional purposes indicated in specific and complementary clauses enabled in certain forms of the App.

The personal data that you provide through the App must be true, accurate, complete and updated. In the case that you provide us with personal data of third parties, you must previously inform them of the content of this clause and obtain their consent.

4. Term of conservation of the data

DIR will keep your personal data for as long as the contractual and commercial relationship with us is in force. Notwithstanding, that We will stop treating your data for the purposes before mentioned, whenever you request its deletion, even though We may retain those data, properly blocked, for the period necessary to comply with our legal obligations and responsibilities.

5. Recipients

The personal data of the User may be communicated to third parties to our suppliers that provide us with services related to the App, such as the developer that provides content hosting services, content delivery, etc., with whom we have subscribed the corresponding contract for the treatment. Your data may also be transferred to the competent authorities in case there is a legal obligation.

6. Your rights regarding the treatment of your personal data

The data protection regulation recognizes the following rights in order to have control over your data, so you can exercise, at any time by sending an email to dadespersonals@dir.cat or in writing to "Gestora Clubs DIR, SL" at the Data Controller address mentioned at Section 1, to the attention of Legal Department. To process your request, we may ask you to prove your identity.

You have the following rights:

Your rights

What does it mean?

Right to be informed

You have the right to obtain clear, transparent and easily understandable information about how we use your personal data, and your rights. This is why we are providing you with the information in this Policy.

Right of access You have the right to know, which of your personal data is being processed and, in this case, to know the purposes for which it is processed, category of data, recipients, retention period, and the rights that concern you, among others. We may charge a reasonable fee taking into account the administrative costs of providing the information.

Right to rectification You have the right to have your personal data rectified when they are inaccurate or outdated and/or completed if it is incomplete.

Right to erasure/right to be forgotten In some cases, you have the right to have your personal data erased or deleted. Note this is not an absolute right, as we may have legal or legitimate grounds for retaining your personal data.

Right to restriction You have the right to request restriction of our processing of your data. This right means that our processing of your data is restricted, so we can store it, but not use nor process it further.

It applies in limited circumstances listed by the General Data Protection Regulation which are as follow:

- 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;
- the processing is unlawful and the data subject (i.e. You) opposes the erasure of the personal data and requests the restriction of their use instead;
- that controller (i.e. DIR) no longer needs the personal data for the purposes of the treatment, but they are required by the data subjects for the establishment, exercise or defense of legal claims;
- the data subject has objected to processing under article 21, paragraph 1, pending the verification 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. It is only possible to exercise this right with respect to data that you have provided, where processing is based on the execution of a contract or your consent and the treatment is carried out by automated means.

Right to processing based on legitimate interests You have the right to oppose at any time to our processing of your data when it such processing is based on the legitimate interests, including profiling and direct marketing.

**Right to
withdraw
consent**

You can withdraw your consent to our processing of your data when such processing is based on consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Right to lodge a
complaint with
a supervisory
authority**

You have the right to complain to the Spanish Agency for Data Protection if you believe that your rights have been violated in relation to the protection of personal data (www.agpd.es).