# **Privacy Policy**

# Kimlab Ltd.

Last updated: April 23, 2023.

Confidentiality and security are paramount values at KimLab Ltd. We are committed to implementing comprehensive measures to ensure the security of your personal data. It is our utmost priority to guarantee your privacy at all times, and we will refrain from collecting any unnecessary information. We would like to keep you informed about the specific measures we are putting in place to safeguard your personal data.

Below, we provide you with all the necessary information about our Privacy Policy in relation to the personal data we collect, explaining:

- Who is responsible for the processing of your data.
- For what purposes we collect the data we request.
- How long we keep them.
- What is the legitimacy for your treatment.
- To which recipients your data is communicated.
- What are your rights.
- Data security measures.

We have adapted this privacy policy to the requirements of this regulation:

- Organic Law 3/2018, of December 5, Protection of Personal Data and guarantee of digital rights (LOPD).
- Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons (GDPR)
- Law 34/2002, of July 11, on Services of the Information Society and Electronic Commerce (LSSICE or LSSI).

### Who is responsible for the processing of your personal data?

Identity: Kimlab, Ltd.

Registered office: C. la Mesta, 20, 40196 La Lastrilla, Segovia, Spain

VAT number no.: B-61354769

Email: mm@kimlab.link

Telephone: +34 657150497

## For what purpose do we process your personal data?

The data we collect and process is strictly limited to identifying information. We do not collect any specially protected or data related to special categories. KimLab collects your personal data for various purposes, including providing a means for you to contact us, responding to your information requests, facilitating the provision of services to you as a user, managing contracted services, processing payments, and sending commercial communications. Specifically, KimLab processes your personal data for the following purposes:

- 1. Communication: We use your personal data to promptly respond to any queries, questions, or requests you make through our service or communication channels on the KimLab website, ensuring effective resolution.
- 2. Platform Improvement: We continuously work to enhance the KimLab Platform, along with its services and products, to provide you with a better user experience and valuable content.
- 3. Website Analytics: We analyze visit metrics of our websites to gain insights and improve their functionality, performance, and relevance.
- 4. Restricted Area Access: We offer access to restricted areas of the KimLab website, allowing you to benefit from exclusive features and resources.
- 5. User Registration Management: We manage your registration as a user on the KimLab website, ensuring a smooth and personalized experience tailored to your preferences.
- 6. Communication: We may send you informative and/or commercial communications via email, keeping you informed about activities, initiatives, or programs that may be of interest to you.
- 7. Recruitment and Hiring: If you submit job applications or candidacies, we assess and manage your submissions, and if appropriate, take necessary actions for personnel selection and hiring.
- 8. Statistical Studies: We conduct studies for statistical purposes, helping us better understand trends, patterns, and user preferences to improve our services.
- 9. Data Maintenance: We ensure the user data is kept updated, accurate, and relevant, allowing us to provide efficient and reliable services.
- 10. Tax Obligations: We fulfill our tax obligations in accordance with applicable laws and regulations.
- 11. Billing and Accounting: We manage billing and accounting purposes to ensure accurate invoicing and financial record-keeping.
- 12. Compliance with Legal Framework: We adhere to the current legal framework, including relevant privacy and data protection laws, to safeguard your rights and ensure lawful data processing.
- 13. Commercial Information Management: We manage data to send you relevant commercial information, keeping you informed about our offerings, promotions, or events that may be of interest to you.

When filling out the forms on the KimLab website, it is essential for users to provide the required information in the mandatory fields. Failure to do so will result in the inability to complete the registration process. Users are responsible for communicating their current personal data to KimLab, ensuring that the information in our records is accurate and up to date, free from errors. This enables us to provide you with optimal services and a seamless user experience.

## How long will we keep your data?

We will retain your personal data for the duration required by KimLab to fulfill our legal or regulatory obligations, as determined by the applicable prescription periods outlined in current regulations.

Periodically, KimLab will conduct an analysis of data retention periods and proactively delete any data that has become obsolete or outdated, ensuring that we only retain relevant and up-to-date information.

### What is the legitimacy for the processing of your data?

To provide personal data, you must be at least 16 years old or have the legal capacity to enter into a contract if required by applicable laws.

The personal data we request is necessary to handle your requests and provide you with contracted services. Failure to provide this data may result in us being unable to properly assist you or fulfill your service requests. The legal basis for processing your data is your explicit consent, which is given when you accept this privacy policy.

There may be occasions where processing your personal data is necessary to comply with legal obligations or in relation to any contractual relationship between you and Kimlab as a USER. We may also retain your data for statistical purposes, system maintenance, website improvement, enhancing the USER experience, error detection and correction, and service provision.

In all other cases, and whenever applicable, Kimlab will seek your consent before processing your personal data.

## To which recipients will your data be communicated?

Your data is treated with utmost confidentiality and will not be transferred to third parties unless there is a legal obligation to do so.

We would like to inform you that, within the scope of current regulations or your contractual relationship with KimLab, certain data may be shared with the following entities:

- 1. The corresponding banking institution for the purpose of payment and invoice collection.
- 2. Entities within the KimLab group for accounting and invoice processing.
- 3. Third-party service providers engaged by KimLab to manage digital campaigns on our behalf.
- 4. The previously anonymized data may be shared with third parties for commercial purposes.

Rest assured that any sharing of your data will be done in compliance with applicable privacy laws and regulations, and adequate safeguards will be in place to protect your information.

## What are your rights when you provide us with your personal data?

Any individual has the right to withdraw their consent for the processing of their personal data at any time. It's important to note that the withdrawal of consent does not affect the execution of any subscription contract or pre-existing relationships.

Additionally, you have the following rights which you can exercise:

- The right to request access to your personal data or its rectification if it is inaccurate.
- The right to request the deletion of your personal data when it is no longer necessary for the original purposes of collection.
- The right to request the limitation of the processing of your personal data in certain circumstances.
- The right to object to the processing of your personal data based on your specific situation.
- The right to data portability as provided for in the relevant regulations.
- Other rights recognized under applicable laws and regulations.

To exercise your rights, you can submit a written request to the responsible person at their postal or email address (provided in the initial section). Please include the reference "Personal Data" and specify the right you wish to exercise and the relevant personal data. If you have any disagreements with KimLab regarding the processing of your data, you have the right to file a complaint with the Data Protection Authority (www.agpd.es).

## Accuracy and veracity of the data

You bear full responsibility for the accuracy, truthfulness, validity, and correctness of the data you provide to us. Therefore, you release us from any liability in this regard and agree to ensure that the information remains up to date.

# Modifications in the privacy policy

KimLab reserves the right to modify this policy to ensure compliance with new legislation, jurisprudence, and industry practices. Furthermore, this privacy policy may be subject to changes based on legislative or self-regulatory requirements. Therefore, we recommend regularly reviewing this policy to stay informed about any updates.

# Security measures

Your personal data will be processed by Kimlab under the strictest confidentiality, applying the corresponding technical and organizational security measures in accordance with current regulations.